

IOWA UTILITIES COMMISSION

IN RE:	
INTERSTATE POWER AND LIGHT COMPANY	DOCKET NO. TF-2025-0047

ORDER ESTABLISHING PROCEDURAL SCHEDULE AND DEFERRING CONSIDERATION FOR CONFIDENTIALITY REQUEST

BACKGROUND

On June 19, 2025, Interstate Power and Light Company (IPL) filed with the Utilities Commission (Commission) a Request for Review of Individual Customer Rate (ICR) Service Agreements and Specific Ratemaking Treatment (Request). The ICR rate service agreements are for QTS Cedar Rapids Infrastructure I, LLC. IPL states the Request is in accordance with the Final Decision and Order issued by the Commission in Docket No. RPU-2023-0002 on September 17, 2024, as well as IPL's Rider ICR–Individual Customer Rate tariff.

On July 1, 2025, the Office of Consumer Advocate (OCA), a division of the Iowa Department of Justice, filed its appearance in the docket. On July 9, 2025, OCA filed its response to IPL's Request, which includes an objection and a request to establish a procedural schedule. OCA states it is objecting because it needs additional time to review IPL's Request. OCA states that it also recommends establishing "...a procedural schedule that will allow OCA and Intervenor to respond to IPL's Request on or before August 15, 2025."

On July 10, 2025, the Commission filed a staff review letter in the docket, requesting additional information from IPL. Also on July 10, 2025, the Commission filed

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a notice that the proposed tariff is being docketed and suspended for further review, pursuant to Iowa Code § 476.6(4).

DISCUSSION

In OCA's objection and request to establish a procedural schedule, OCA states it has concerns with IPL's Request, including "...IPL's election to work only with ITC Midwest and the ICR customer in the development of the proposed ICR rate...." OCA further states that the Commission's review must also consider "...whether IPL has reasonably determined the marginal costs to serve the ICR load in setting the ICR rate and whether the Service Agreement terms ... are adequate for that purpose." The Commission agrees with OCA and will establish a procedural schedule for this docket.

A procedural schedule is attached as Attachment A and incorporated into this order by reference. IPL, OCA, and all intervenors will be required to file a submission of the issues and supporting information, as well as statements of their position and supporting information, as directed in the attached procedural schedule.

Additionally, although OCA states in its request to establish a procedural schedule that "OCA will participate in any proceeding or technical conference established by the IUC to review this filing," at this time, the Commission does not believe a technical conference is necessary. If a technical conference becomes necessary in the future, the Commission will advise the parties accordingly.

CONFIDENTIAL TREATMENT

IPL's June 19, 2025 Request also included an application for confidential treatment pursuant Iowa Code §§ 22.7(3) and (6), and 199 Iowa Administrative Code (IAC) 1.7. IPL seeks to hold the following materials confidential:

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- Confidential Attachment 1 – PSA, a confidential contract for the purchase of real estate entered into between an IPL affiliate and an affiliate of the customer.
- Confidential Attachment 2 – CRA, a confidential contract covering facilities to be constructed to provide service to the customer.
- Confidential Attachment 4 – Phase 2 ESA, Confidential Attachment 5 – Phase 3 ESA, and Confidential Attachment 6 – AESA, confidential contracts covering the terms of service between IPL and the customer.
- Confidential Attachment 8 – IPL Rider ICR Rates, Revenue, and Marginal Costs of Service, a report created by IPL at the direction of counsel that provides a confidential narrative of the negotiated terms and rates agreed to between IPL and the customer.
- Confidential Attachment 9 – IPL Rider ICR Cost of Service, a confidential spreadsheet that contains IPL's estimated marginal costs and estimated revenues.

In support of its application for confidential treatment, IPL included an affidavit signed by a corporate officer, in which IPL asserted the following under oath:

IPL's filings contain the Company's confidential estimated costs, estimated revenues, estimated usage, customer specific information, and confidential negotiated contracts. Public disclosure of this information could harm IPL's competitive position in negotiating with future customers and in the market for acquisition of energy, capacity, and energy projects to the detriment of its customers. Disclosure of the foregoing information would also put IPL at a competitive disadvantage in negotiations with current and prospective third-party suppliers, and harm IPL's ability to negotiate contracts for the benefit to customers. The end result would be higher costs to customers on less favorable terms for IPL's customers than otherwise may be achieved. Thus, no public purpose would be served by public disclosure of the information.

Release of the foregoing information could result in the release of commercially sensitive, trade secret information, as well as higher costs to customers which furthers no public purpose.

The Commission's rule governing confidentiality requests provides, in part, that "[i]f no objection to the request for confidential treatment is filed within 20 days [of the filing of the request,] the commission may defer consideration of the request until a public records request is made for the material or information," and the material or

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information shall be withheld from public inspection subject to subparagraph 1.7(6)(b)(3). 199 IAC 1.7(4)(c). Pursuant to this rule and because no objection has been filed to the request, the Commission will defer consideration of IPL's confidentiality request until a public records request is made for the material or information, and the material shall be withheld from public inspection subject to subparagraph 1.7(6)(b)(3).

ORDERING CLAUSES

IT IS THEREFORE ORDERED:

1. A procedural schedule established for this docket is attached to this order and identified as Attachment A.
2. Consideration for Interstate Power and Light Company's June 19, 2025 request for confidential treatment is deferred, and the information and material shall be withheld from public inspection subject to 199 Iowa Administrative Code 1.7(6)(b)(3).

UTILITIES COMMISSION



Sarah Martz, Chair



Joshua Byrnes, Commissioner



Erik Helland, Commissioner

ATTACHMENT A

TF-2025-0007 Procedural Schedule	
Intervention Deadline	July 24, 2025
OCA and Intervenor Issues and Supporting Information Due	July 24, 2025
IPL Response Due	August 6, 2025
IPL, OCA, and Intervenor Statements of Position and Supporting Information Due	August 14, 2025