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INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

IN THE MATTER OF THE SUBMISSION BY)
HOOSIER ENERGY RURAL ELECTRIC)
COOPERATIVE, INC. OF ITS 2014)
INTEGRATED RESOURCE PLAN AND)
REQUEST FOR A COMMISSION)
DETERMINATION THAT DESIGNATED)
INFORMATION BE EXEMPT FROM)
PUBLIC DISCLOSURE)

Cause No. 44559

**PETITION OF HOOSIER ENERGY RURAL ELECTRIC COOPERATIVE, INC.
FOR CONFIDENTIAL AND PROPRIETARY TREATMENT OF CERTAIN
PORTIONS OF ITS INTEGRATED RESOURCE PLAN**

Hoosier Energy Rural Electric Cooperative, Inc. ("Hoosier Energy"), by counsel, hereby petitions this Commission, pursuant to the provisions of 170 IAC 4-7-3(f), to find that certain information contained in the 2014 Integrated Resource Plan (IRP) submitted by Hoosier Energy is confidential, proprietary, competitively sensitive, and/or trade secret, and therefore exempt from public disclosure under IC 8-1-2-29 and IC 5-14-3, and in support thereof says:

1. Hoosier Energy is a rural electric cooperative corporation organized and existing pursuant to the laws of the State of Indiana, specifically the Rural Electric Membership Corporation Act, Indiana Code 8-1-13 as amended, with its principal place of business being 7398 State Road 37, Bloomington, Indiana 47402. Hoosier Energy is a general district corporation as described in I.C. § 8-1-13-23 and has seventeen local district corporation members in Indiana and one electric cooperative member in Illinois.

As such, Hoosier Energy is subject to the jurisdiction of the Commission, in the manner and to the extent provided by law.

2. The information sought to be kept confidential has been redacted and is identified in the Affidavit of Mike Mooney, Manager, Corporate Planning, attached hereto as Exhibit A and incorporated herein by reference. The confidential, proprietary, competitively sensitive, and/or trade secret information for which protection is sought in this petition is predominately the same (but updated) information that the Commission has found to be exempt from public disclosure in prior Commission orders.

3. This redacted information contains detailed engineering and resource optimization analysis of the environmental regulations on existing resources and future generation alternatives. This information also includes detail on Hoosier's costs and resources for potential wholesale transactions with other utilities, as well as dispositions of resources and projections of commodity prices. If this information were generally available to the public, Hoosier would be placed at a considerable competitive disadvantage, as set forth in the Mooney Affidavit. The knowledge of Hoosier's costs and pricing provides a competitor with a material advantage in formulating a competitive bid. Such information is not available or ascertainable by competitors through normal or proper means.

4. Hoosier considers that Ind. Code 8-1-2-29 and Ind. Code 5-14-3, among others, are or may be applicable to the subject matter of these proceedings.

5. The name and address of Hoosier's attorneys in this matter are:

Christopher M. Goffinet (16409-62)
Jeffrey W. Hagedorn (19806-49)
Huber, Goffinet & Hagedorn
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WHEREFORE, Hoosier prays that this Commission find that the redacted information submitted under seal is proprietary and confidential, and constitutes trade secrets, pursuant to the provisions of 170 IAC 4-7-3(f) and IC 5-14-3-4; that the sealed copy of this information should not be available for public inspection; that only the redacted copy of the IRP may be made available for public inspection; and for such other relief as may be proper in the premises.

DATED this 3rd day of November, 2014.

By:



Christopher M. Goffinet
Attorney No. 16409-62
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727 Main Street
Tell City, Indiana 47586
Telephone: (812) 547-7081
Attorneys for Hoosier Energy Rural
Electric Cooperative, Inc.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**IN THE MATTER OF THE SUBMISSION BY)
HOOSIER ENERGY RURAL ELECTRIC)
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INTEGRATED RESOURCE PLAN)**

Cause No. _____

AFFIDAVIT

Comes now Michael Mooney who, being first duly sworn upon his oath, says that:

1. I am the Manager, Corporate Planning, for Hoosier Energy Rural Electric Cooperative, Inc. (“Hoosier”).

2. In such position, I have responsibility for the preparation of Hoosier’s Integrated Resource Plan (IRP).

3. I have personal knowledge of the proprietary and confidential nature of the information contained in Hoosier’s IRP and of the information set forth herein, which information is provided to further demonstrate the proprietary and confidential nature of the information contained in Hoosier's IRP that Hoosier has requested the Commission exempt from public disclosure. This information and that listed in Paragraph 5 is hereinafter referred to as the “Confidential Information.”

4. The IRP submitted by Hoosier is an assessment of a variety of demand-side and supply-side resources that Hoosier may use to cost-effectively meet the electricity service needs of its members.

5. The Confidential Information sets forth Hoosier's Federal Energy Regulatory Commission ("FERC") Form 715, Annual Transmission Planning and Evaluation information that is considered to be CEII following the events of September 11, 2001. This information is provided confidential treatment by the FERC, and Hoosier takes all reasonable steps to protect this information from public disclosure. On that basis confidential treatment should be afforded FERC Form 715.

6. I have personal knowledge of the proprietary and confidential nature of the information contained in Hoosier's IRP, specifically:

- a. Volume I, Section 6.2-Hoosier Energy's Existing Supply-Side Resources;
- b. Volume I, Section 6, Table 23- Forecasted Fuel Prices;
- c. Volume I, Section 6, Table 24-Forecasted Emissions Costs;
- d. Volume I, Section 6, Table 25-Forecasted Market Power Prices;

Hoosier has requested the Commission exempt the above from public disclosure.

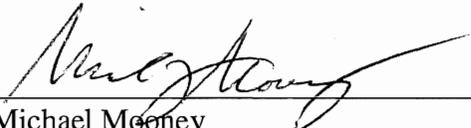
7. The proprietary and confidential information contained in Hoosier's IRP would be of economic value to suppliers and competitors and is not available or ascertainable by competitors through normal or proper means. Disclosure of the information would unfairly allow suppliers and competitors to analyze Hoosier's operations, make pricing decisions, and determine market entry. Hoosier has spent considerable time and money in developing its assumptions contained in the confidential information and believes this information should be kept proprietary and confidential.

8. Hoosier takes all reasonable steps to protect the confidential information from public disclosure and does not release such information outside of Hoosier without appropriate confidentiality protection.

9. For the reasons set forth herein, the Confidential Information should be
excepted from public disclosure.

Further Affiant saith not.

HOOSIER ENERGY RURAL ELECTRIC
COOPERATIVE, INC.



Michael Mooney
Manager, Corporate Planning

Subscribed and sworn to before me, a Notary Public in and for said county and state, this
3RD day of NOVEMBER, 2014.



Notary Public MELANIE J. TURNER

My Commission expires: 1-21-2016

