

FILED

OCT 31 2014

INDIANA UTILITY
REGULATORY COMMISSION

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF SOUTHERN INDIANA GAS)
AND ELECTRIC COMPANY D/B/A)
VECTREN ENERGY DELIVERY OF)
INDIANA, INC ("VECTREN SOUTH") FOR)
DETERMINATION THAT CERTAIN) CAUSE NO.
INFORMATION CONTAINED IN ITS 2014)
INTEGRATED RESOURCE PLAN IS)
CONFIDENTIAL AND EXEMPT FROM)
PUBLIC DISCLOSURE PURSUANT TO 170)
4-7-3(f), 170 IAC 1-1.1-4, IND. CODE § 8-1-2-)
29 AND IND. CODE § 5-14-3-4.)

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**SOUTHERN INDIANA GAS AND ELECTRIC COMPANY'S
PETITION REQUESTING FINDING OF CONFIDENTIALITY
OF PORTIONS OF ITS 2014 INTEGRATED RESOURCE PLAN**

Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc. ("Vectren South" or "Petitioner"), pursuant to 170 IAC 1-1.1-4, hereby requests a finding by the Indiana Utility Regulatory Commission ("Commission") that certain information hereinafter described and contained in its 2014 Integrated Resource Plan ("IRP") to be filed with the Commission ("Confidential Information") is confidential, proprietary, competitively sensitive and/or trade secret, exempt from public disclosure and should be treated as confidential by all parties and the Commission and its staff. In support thereof, Vectren South states that:

1. Petitioner is a public utility corporation organized and existing under the laws of the State of Indiana and having its principal office at One Vectren Square, 211 N.W. Riverside Drive, Evansville, Indiana. It is engaged in rendering electric public utility service in the State of Indiana and owns, operates, manages and controls, among other things, plant and equipment within the State of Indiana used for the production, transmission, delivery and furnishing of electric power to the public.

2. The statutes and regulations Vectren South considers applicable to this petition include: 170 IAC 4-7 and 1-1.1-4, and Ind. Code §§ 8-1-2-29 and 5-14-13.

3. The names and addresses of all persons authorized to accept service of papers in this proceeding are:

Robert E. Heidorn
P. Jason Stephenson
Joshua A. Claybourn
One Vectren Square
211 N.W. Riverside Drive
Evansville, Indiana 47708
Phone: 812.491.4209
Fax: 812.491.4239
Email: rheidorn@vectren.com
jstephenson@vectren.com
jclaybourn@vectren.com

4. The Confidential Information consists of confidential portions of the technical appendices, including a technology assessment report, system load data, and load scenario reports ("Confidential Technical Appendices"). Under 170 IAC 4-7-4(b) a Utility is required to submit such Confidential Technical Appendices.

5. The Confidential Information should be treated confidential because, as affirmed by Matt Rice in the affidavit attached hereto as Exhibit A, the public has limited access to this information. Vectren South also limits access to the Confidential Information to those employees who have a need to know the information. Public disclosure of the information would be harmful to Vectren South and other parties. The Confidential Information includes cost components of Vectren South's generation facilities. This information, were it to be publicly available, could be utilized by other participants in the wholesale power markets to evaluate Vectren South's electricity costs and gain a competitive advantage in submitting price offers to the Midcontinent Independent System Operator, Inc. The Commission previously found that similar information

in Vectren South's and other utilities' IRPs was entitled to confidential treatment and therefore exempt from the public access requirements. *See, e.g. Southern Indiana Gas & Elec. Co. d/b/a Vectren Energy Delivery of Indiana, Inc.*, Cause No. 43380 (IURC 1/30/2008); *Indiana Michigan Power Co.*, Cause No. 43378 (1/30/2008); *Indianapolis Power & Light Co.*, Cause No. 43379 (1/30/2008), *Northern Indiana Public Service Company*, Cause No. 43381 (IURC 1/30/2008); and *Duke Energy Indiana, Inc.*, Cause No. 43382 (IURC 4/23/2008).

6. Vectren South has provided under seal to the Commission a nonredacted copy of Vectren South's IRP that contains the Confidential Information. If the Commission finds such information not to be confidential, Vectren South requests that the nonredacted information be returned prior to public disclosure in accordance with 170 IAC 1-1.1-4(d).

7. Vectren South is providing the Office of Utility Consumer Counselor ("OUCC") with a nonredacted copy of Vectren South's IRP pursuant to the Standard Form Nondisclosure Agreement between Vectren South and OUCC dated March 28, 2006.

WHEREFORE, Petitioner respectfully requests that the Commission:

1. Following such investigation as the Commission deems necessary, find that Vectren South's IRP contains information that is confidential under federal and state law and is thereby exempted from the access to public record provisions, as set forth in Ind. Code § 5-14-3-4 and Ind. Code § 8-1-2-29; and

2. Grant to Vectren South such other relief as the Commission deems appropriate.

Respectfully submitted,

Joshua A. Claybourn

Joshua A. Claybourn

Attorney for
SOUTHERN INDIANA GAS AND ELECTRIC
COMPANY D/B/A VECTREN ENERGY
DELIVERY OF INDIANA, INC.

Robert E. Heidorn, Atty. No. 14264-49
P. Jason Stephenson, Atty No. 21839-49
Joshua A. Claybourn, Atty. No. 26305-49
VECTREN CORPORATION
One Vectren Square
211 N.W. Riverside Drive
Evansville, Indiana 47708
Telephone: (812) 491-4203
Facsimile: (812) 491-4238
Email: rheidorn@vectren.com
jstephenson@vectren.com
jclaybourn@vectren.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served this 31st day of October, 2014, by electronic mail or United States Mail, postage prepaid, to the Office of Utility Consumer Counselor, National City Bank Building, 115 W. Washington Street, Suite 1500 South, Indianapolis, Indiana 46204.

Joshua A. Claybourn

Joshua A. Claybourn (Atty. No. 26305-49)

STATE OF INDIANA)
) ss
COUNTY OF VANDENBURGH)

AFFIDAVIT OF MATT RICE

Matt Rice, being first duly sworn upon his oath says:

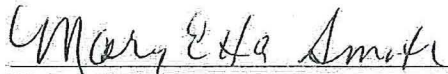
1. I am Manager, Market Research and Analysis for Southern Indiana Gas and Electric Company d/b/a Vectren Energy Delivery of Indiana, Inc. ("Vectren South"), and, at all times relevant to this matter, have been involved in drafting and coordinating the preparation of the integrated resource plan ("IRP") submitted by Vectren South, on or about November 1, 2014, pursuant to the rules and regulations of the Indiana Utility Regulatory Commission ("Commission"). I am familiar with the content of the IRP and the need to protect certain confidential and proprietary information contained therein from disclosure. I acknowledge that I am of the requisite age and capacity to testify to the matters stated and that I make this affidavit based upon direct personal knowledge.
2. I have personal knowledge of the information contained in Vectren South's IRP and of the information set forth herein, which information is provided to further demonstrate that the information contained in Vectren South's IRP that Vectren South has requested the Commission exempt from public disclosure. This information is hereinafter referred to as the "Designated Information."
3. I am supplying this affidavit to the Commission to support Vectren South's Request for Finding of Confidentiality, specifically, that the Designated Information contained in the IRP is confidential, pursuant to Ind. Code § 8-1-2-29, Ind. Code § 5-14-3-4, and 170 IAC 1-1.1-4.
4. In response to certain information requirements contained in the Commission's Guidelines for Integrated Resource Planning by an Electric Utility, Vectren South is filing confidential technical appendices, including a technology assessment report, system load data, and load scenario reports ("Confidential Technical Appendices"). Such information has been redacted in the redacted version of the IRP being submitted by Vectren South and should be protected from public disclosure.
5. Due to the risk that disclosure of this sensitive information poses, Vectren South designated its Confidential Technical Appendices as confidential. This information, were it to be publicly available, could be utilized by other participants in the wholesale power markets to evaluate Vectren South's electricity costs and gain a competitive advantage in submitting price offers to the Midcontinent Independent System Operator, Inc.
6. Vectren South has maintained the confidentiality of the Confidential Technical Appendices by taking all reasonable steps in order to protect it, including sharing such information internally on a need to know basis and limiting the public availability of the Designated Information.

Further, Affiant sayeth not.



Matt Rice
Manager, Market Research and Analysis

The preceding Affidavit of Jim Cox was subscribed and sworn before me this 30th day of October, 2014.



Notary Public

My Commission Expires July 4, 2022

My County of Residence Vanderburgh

