

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA MICHIGAN POWER)
COMPANY FOR APPROVAL OF THE FOURTH)
AMENDMENT TO THE CONTRACT FOR) CAUSE NO. 45120
ELECTRIC SERVICE WITH STEEL DYNAMICS,)
INC.)

SUBMISSION OF AFFIDAVIT IN SUPPORT OF MOTION FOR PROTECTION

Indiana Michigan Power Company ("I&M"), by counsel, submits the attached affidavit of Jordan Breiner in support of I&M's Motion for Protection of confidential, proprietary trade secret information in the above-referenced Cause.

Respectfully submitted,



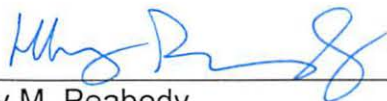
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Attorney for:
INDIANA MICHIGAN POWER COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the forgoing was served, this 31st day of July, 2018, by hand delivery, electronic transmission or U.S. Mail, first class postage prepaid upon:

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Attorney for Petitioner
Indiana Michigan Power Company

STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION

STATE OF INDIANA)
) SS:
COUNTY OF DEKALB)

AFFIDAVIT

Jordan Breiner, being first duly sworn upon his oath says:

1. I acknowledge that I am of requisite age and capacity to testify to the matters stated and that I make this affidavit based on personal knowledge of efforts taken by Steel Dynamics, Inc. (SDI) to maintain the secrecy of confidential information.

2. I am General Manager of SDI's Flat Roll Division located at 4500 County Road 59, Butler, Indiana 46721.

3. The Fourth Amendment to the Contract for Electric Service between SDI and Indiana Michigan Power Company under consideration by the Indiana Utility Regulatory Commission (Commission) in this Cause contains information that SDI considers confidential, proprietary, and competitively sensitive, and trade secret.

4. SDI sells steel products in extremely competitive regional, national and global markets. Public disclosure of the information for which protection is requested could harm SDI by informing its competitors of specifics of SDI's power supply arrangement.

5. Because energy costs are a major component of the production cost of a steel maker, such as SDI, knowledge of pricing information and SDI's operational capabilities could benefit SDI's competitors, thereby affecting the competitiveness and profitability of SDI's Butler facility.


6. The Fourth Amendment to the Contract for Electric Service for which SDI seeks protection includes pricing, interruptibility provisions, and the contract term. This confidential, proprietary, competitively sensitive, and trade secret information, if disclosed, would reveal commercially sensitive information to SDI's competitors and cause irreparable harm to SDI.

7. The Fourth Amendment to the Contract for Electric Service is treated as a confidential document within the SDI organization with access limited to management and employees who need to know the information. This confidential information is not available or ascertainable by competitors through normal or proper means.

8. For the reasons set forth herein, the Fourth Amendment to the Contract for Electric Service should be exempt from public disclosure.


Further Affiant sayeth not.

Dated: 5-23-18

By: 
Jordan Breiner
General Manager
Flat Roll Division
Steel Dynamics, Inc.

STATE OF INDIANA)
) SS:
COUNTY OF DEKALB)

Subscribed and sworn to before me, a Notary Public, in and for said County and State this 23~~rd~~ day of May 2018.


Notary Public

I am a resident of Dekalb County, Indiana.
My commission expires: 7/14/2019

