

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

<p>LINDA K. JUCKETTE,</p> <p>Petitioner,</p> <p>vs.</p> <p>IOWA UTILITIES BOARD,</p> <p>Respondent,</p> <p>and</p> <p>MIDAMERICAN ENERGY COMPANY, OFFICE OF CONSUMER ADVOCATE,</p> <p>Intervenors.</p>	<p>CASE NO. CVCV061580</p> <p>APPLICATION TO RESTRICT ACCESS / MOTION TO FILE PORTIONS OF THE AGENCY RECORD UNDER SEAL</p>
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COMES NOW the Respondent Iowa Utilities Board (“IUB”) and, pursuant to Iowa Rule of Court 16.405(2), moves for permission to file portions of the agency record under seal:

1. On May 7, 2021, the IUB transmitted the agency record non-electronically pursuant to Iowa Rule of Court 16.313(1)(a).
2. Page 532 of the Certified Agency Record is a public version of Master Facilities Construction Agreement, which was filed with the IUB confidentially.
3. Petitioner Linda Juckette requested the IUB supplement the Certified Agency Record by filing a non-redacted version of the Master Facilities Construction Agreement.¹

1. The IUB will also supplement the Certified Agency Record if requested by any other party; however, as of the date of this motion, no other request has been made.

4. The IUB proposes to file the confidential Master Facilities Construction Agreement with the following Bates stamp on each page: “Confidential Certified Record Page No.”

5. Pursuant to Iowa Rule of Court 16.405(2), the IUB requests this Court grant the above-captioned application and restrict general access to the supplemental Certified Agency Record filing.

6. IUB further requests the Court assign the Confidential Certified Record at Document Security Level 5, limiting access to authorized court personnel.

7. The IUB will transmit the document pursuant to Iowa Rule of Court 16.405 if the Court approves the above-captioned motion.

WHEREFORE, the Respondent Iowa Utilities Board moves the Court for an order pursuant to Rule 16.405(2) granting the motion to file the portions of the certified agency record under seal.

Dated this 17th day of August 2021.

Respectfully submitted,

/s/ Jon Tack

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ATTORNEYS FOR RESPONDENT, IOWA
UTILITIES BOARD

ALL PARTIES SERVED ELECTRONICALLY