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Jeffrey Cook,
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July 15, 2025

Via eFiling
The Honorable Debbie-Anne Reese, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: MidAmerican Energy Company, Docket No. QM25-___-000

Dear Secretary Reese:

Enclosed for electronic filing are MidAmerican Energy Company's Application to Terminate its PURPA Mandatory Purchase Obligation, which includes a non-public Attachment B. The non-public Attachment contains confidential identifying information regarding queued or other non-public potential projects that could qualify for QF status. Attachment B is marked "CUI//PRIV."

If you have any questions concerning any aspect of this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Jeffrey J. Cook
Jeffrey J. Cook
Attorney for the Applicant

Cc: Illinois Commerce Commission
Iowa Utilities Commission
South Dakota Public Utilities Commission

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

MidAmerican Energy Company) Docket No. QM25-___-000

APPLICATION OF MIDAMERICAN ENERGY COMPANY TO TERMINATE THE MANDATORY PURPA PURCHASE OBLIGATION

Pursuant to Section 210(m) of the Public Utility Regulatory Policies Act of 1978, as amended ("PURPA"),[1] Order No. 872,[2] and Sections 292.309 and 292.310[3] of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations, MidAmerican Energy Company ("MidAmerican" or "Company") respectfully requests FERC grant the Company relief, on a service territory-wide basis for its system within the Midcontinent Independent System Operator, Inc. ("MISO"), of the Section 292.303(a)[4] requirement to purchase energy and capacity made available by qualifying small power production facilities ("SPPF QFs") that have a net capacity greater than 5 megawatts ("MW").

As discussed below, QFs within MISO enjoy non-discriminatory access to transmission and interconnection services provided by MISO and have access to competitive wholesale markets that provide them with a meaningful opportunity to sell capacity and electric energy.[5] With this recognition, the Commission has previously granted MidAmerican's request to

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[1] 16 U.S.C. § 824a-3(m) (2025).

[2] *Qualifying Facility Rates & Requirements: Implementation Issues Under the Pub. Util. Regulatory Policies Act of 1978*, Order No. 872, 172 FERC ¶ 61,041 (2020), *order on reh'g*, Order No. 872-A, 173 FERC ¶ 61,158 (2020).

[3] 18 C.F.R. §§ 292.309, 292.310 (2025).

[4] 18 C.F.R. § 292.303.

[5] Section 292.309(e) of the Commission's regulations establishes a rebuttable presumption that MISO provides over 20 MW QFs with non-discriminatory access to the markets described in Section 210(m)(1)(A) of PURPA. *See* 18 C.F.R. § 292.309(e).

terminate its obligation to enter into new power purchase obligations from QFs having a net capacity greater than 20 MWs that are located within MISO.[6] Here, MidAmerican respectfully requests the Commission also terminate MidAmerican's obligation to enter into new contracts or obligations with SPPF QFs with a capacity greater than 5 MW.

I. INTRODUCTION

A. Description of MidAmerican

MidAmerican, an Iowa corporation, is a vertically integrated electric and natural gas utility headquartered in Des Moines, Iowa, and is a subsidiary of Berkshire Hathaway Energy, Inc. MidAmerican serves over 1.6 million customers in the states of Iowa, Illinois, South Dakota, and Nebraska.[7] MidAmerican is a transmission owning member of MISO.

B. Communications

In accordance with Section 292.310(d)(8) of the Commission's regulations,[8] communications relating to this application should be sent to the following:

[6] *See MidAmerican Energy Company*, Letter Order, Docket No. QM09-5-000 (Aug. 12, 2009).

[7] MidAmerican currently only maintains natural gas distribution service in Nebraska.

[8] 18 C.F.R. § 292.310(d)(8).

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C. Requirements

PURPA requires utilities to purchase capacity and energy from a QF at the utility's avoided costs.[9] Congress amended PURPA in 2005 by adding Section 210(m), which provides the Commission authority to relieve utilities of their obligation under PURPA to purchase energy and capacity from QFs if certain conditions are met. Specifically, Section 210(m) provides:

> (1) Obligation to purchase – After August 8, 2005, no electric utility shall be required to enter into a new contract or obligation to purchase electric energy from a qualifying cogeneration facility or a qualifying small power production facility under this section if the Commission finds that the qualifying cogeneration facility or qualifying small power production facility has nondiscriminatory access to –
>
> (A)(i) independently administered, auction-based day ahead and real time wholesale markets for the sale of electric energy; and (ii) wholesale markets for long-term sales of capacity and electric energy; or
>
> (B)(i) transmission and interconnection services that are provided by a Commission-approved regional transmission entity and administered pursuant to an open access transmission tariff that affords nondiscriminatory treatment to all customers; and (ii) competitive wholesale markets that provide a meaningful opportunity to sell capacity, including long-term and short-term sales, and electric energy, including long-term, short-term and real-time sales, to buyers other than the utility to which the qualifying facility is interconnected. In determining whether a meaningful opportunity to sell exists, the Commission shall consider, among other factors, evidence of transactions within the relevant market; or

[9] 18 C.F.R. § 292.303(a).

> (C) wholesale markets for the sale of capacity and electric energy that are, at a minimum, of comparable competitive quality as markets described in subparagraphs (A) and (B).

Under the Commission's regulations at Section 292.309(a), implementing PURPA Section 210(m), the Commission may relieve a utility from its purchase obligation if certain requirements are met. Specifically, utilities may be relieved of PURPA's mandatory purchase obligation upon a showing that QFs have non-discriminatory access to:

> (1)(i) Independently administered, auction-based day ahead and real time wholesale markets for the sale of electric energy; and (ii) Wholesale markets for long-term sales of capacity and electric energy; or
>
> (2)(i) Transmission and interconnection services that are provided by a Commission-approved regional transmission entity and administered pursuant to an open access transmission tariff that affords nondiscriminatory treatment to all customers; and (ii) Competitive wholesale markets that provide a meaningful opportunity to sell capacity, including long-term and short-term sales, and electric energy, including long-term, short-term and real-time sales, to buyers other than the utility to which the qualifying facility is interconnected. In determining whether a meaningful opportunity to sell exists, the Commission shall consider, among other factors, evidence of transactions within the relevant market; or
>
> (3) Wholesale markets for the sale of capacity and electric energy that are, at a minimum, of comparable competitive quality as markets described in paragraphs (a)(l) and (a)(2) of this section.[10]

Section 292.309(e) of the Commission's regulations provides that MISO qualifies as a market described in Section 292.303(a)(1), and there is a "rebuttable presumption" that "large" QFs have nondiscriminatory access to the MISO markets through Commission-approved open access transmission tariffs and interconnection rules, and that electric utilities that are members

[10] 18 C.F.R. § 292.309(a)(1)–(3).

of MISO may petition the Commission to be relieved from the mandatory PURPA purchase obligation from large QFs.

In its Order No. 872,[11] the Commission updated the rebuttable presumption threshold, i.e., what qualified as large as that term is used above, for SPPF QFs (but not cogeneration facilities) from 20 MW to 5 MW.[12] The Commission determined, however, that "those utilities for which the Commission has already granted relief from the mandatory purchase obligation for small power production facilities over 20 MW must reapply with the Commission requesting relief from the mandatory purchase obligation for SPPF QFs between 5 MW and 20 MW."[13]

Accordingly, MidAmerican seeks termination of its obligation to enter into any new contract or obligation to purchase energy and capacity from SPPF QFs with a capacity between 5 MW and 20 MW in its service territory within MISO. As the Commission found, such SPPF QFs have non-discriminatory access to (i) independently administered, auction-based day ahead and real time wholesale markets for the sale of electric energy; and (ii) wholesale markets for long-term sales of capacity and electric energy.[14]

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[11] *Qualifying Facility Rates and Requirements*, Order No. 872, 172 FERC ¶ 61,041 (2020) ("Order No. 872"), *Qualifying Facility Rates and Requirements, Implementation Issues Under the Public Utility Regulatory Policies Act of 1978*, Order No. 872-A, 173 FERC ¶ 61,158 (2020) ("Order No. 872-A").

[12] Order No. 872-A at P 19; *see also*, 18 C.F.R. § 292.309(e).

[13] Order No. 872 at P 645.

[14] *See e.g.,* Order No. 872-A at P 360 ("As the Commission stated, markets have matured and the markets have provided, and continue to provide, increased access to smaller resources demonstrating the need for the Commission to reconsider its definition of small power production QFs. In the final rule, the Commission updated the relevant definition of a small power production facility for purposes of 292.309 to be 5 MW and, despite the arguments on rehearing, we affirm that finding here.").

II. SECTION 292.310(D)(3) INFORMATION

Section 292.310(d)(3) of the Commission's regulations requires an applicant seeking to be relieved of its PURPA purchase obligation to submit transmission studies and related information with its application, including: (i) the applicant's long-term transmission plan conducted by applicant or a regional transmission organization, independent system operator or other relevant entity; (ii) transmission constraints by path, element or other level of comparable detail that have occurred and/or are known and expected to occur, and any proposed mitigation including transmission construction plans; (iii) levels of congestion, if available; (iv) relevant system impact studies for the generation interconnections that have already been completed; (v) other information pertinent to showing whether transfer capability is available; and (vi) the appropriate link to the applicant's OASIS, if any, from which a QF may obtain applicant's available transmission capacity information. The Commission confirmed that applicants may provide hyperlinks to relevant documents available on the internet instead of submitting entire documents with their applications.[15]

In accordance with the requirements of Section 292.310(d)(3), MidAmerican submits the following information:

A. Long-Term Transmission Planning

MidAmerican is a transmission owning member of MISO; consequently, MidAmerican's long-term transmission planning is conducted through MISO's annual Transmission Expansion Process ("MTEP"). General information regarding the MISO Transmission Planning Process and links to study reports can be found at: https://www.misoenergy.org/planning/. Attachment FF of the MISO Tariff, available at https://docs.misoenergy.org/miso12-legalcontent/Attachment_FF_-

[15] Order No. 688-A at P 112.

_Transmission_Expansion_Planning_Protocol.pdf, describes the MISO transmission expansion process. MidAmerican's local transmission planning process is contained in Attachment FF and is discussed on page 404 of that document. Any projects which stem from MidAmerican's local planning process are submitted for consideration in the MTEP.

The MISO Transmission Expansion Plan 2024 ("MTEP24"), approved by the MISO Board of Directors in December 2024, contains the most recent detailed information concerning transmission constraints, proposed mitigation (including construction plans), and levels of congestion. A copy of MTEP24 is available at:

https://cdn.misoenergy.org/MTEP24%20Full%20Report658025.pdf

MidAmerican specific projects are discussed in MTEP24 at pages 279 and 280.

B. Transmission Constraints

As part of MISO's FERC approved Order No. 890[16] transmission planning process, MISO and its stakeholders utilize a comprehensive planning approach, which includes performing various studies to identify transmission issues, such as transmission constraints, and evaluating projects in the context of addressing these issues. As noted, the MTEP24 Report discusses MISO transmission constraints and proposed mitigation plans, including construction of needed transmission at Chapters 2 and 4 and Appendix A.

C. Congestion

As part of MISO's FERC-approved Order No. 890 transmission planning process, MISO performs several congestion-based studies and identifies transmission investments that would be

[16] *Preventing Undue Discrimination and Preference in Transmission Service,* Order No. 890, FERC Stats. & Regs. ¶ 31,241, *order on reh'g*, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), *order on reh'g*, Order No. 890-B, 123 FERC ¶ 61,299 (2008), *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228, *order on clarification*, Order No. 890-D, 129 FERC ¶ 61,126 (2009).

required to address congestion. As noted, MTEP24 discusses MISO congestion and proposed mitigation plans at Chapters 2 and 4. MidAmerican's local transmission planning process also includes provision under which congestion on MidAmerican's facilities can be studied. MISO also posts congestion and constraint data on its website in real-time, which is available at: https://www.misoenergy.org/markets-and-operations/real-time--market-data/markets-displays/.

In addition, MISO's independent market monitor publishes an annual State of the Market Report, discussing (among other things) transmission congestion within MISO. The 2024 State of the Market Report (June 2025), which is the most recent annual report, provides an overview of congestion in Section V (Transmission Congestion and FTR Markets). The 2024 State of the Market Report is available at: https://www.potomaceconomics.com/markets-monitored/miso/

D. System Impact Studies and Generator Interconnections to MISO Transmission

Because MISO is the transmission provider for MidAmerican, all system impact studies for generation interconnections to the transmission system within the MISO footprint are performed by MISO. MISO has established Generator Interconnection Procedures ("GIP") and a *pro forma* Generator Interconnection Agreement ("GIA") for new facilities interconnecting to the MISO grid. MISO's GIP are included as Attachment X to its Tariff, and its GIA is included as Appendix 6 to Attachment X. In addition to the relevant Tariff provisions, MISO's website includes information on procedures and requirements for the generation interconnection application process. Information regarding the generator interconnection process within MISO is available at: https://www.misoenergy.org/planning/resource-utilization/generator-interconnection/. Generation interconnection requests and interconnection studies are listed in

the table available through the link above, on the hyperlink entitled "Generator Interconnection Queue."[17] Interconnections to the MidAmerican distribution system as discussed *infra*.

E. ATC and OASIS

Because MISO is the transmission provider for MidAmerican, information regarding available transmission capability can be found at the MISO OASIS available at: https://www.oasis.oati.com/MISO/index.html. *See* "ATC Information" hyperlink.

F. Transfer Capacity

The linked information above constitutes all pertinent information showing whether transfer capability is available.

G. Process for Obtaining Transmission Service – Section 292.310(d)(4)

Section 292.310(d)(4) of the Commission's regulations requires MidAmerican to describe the process, procedures and practices that QFs interconnected to MidAmerican's system must follow to arrange for transmission service to transfer power to purchasers other than MidAmerican. Such description must include the process, procedures and practices of all distribution, transmission and regional transmission facilities necessary for QF access to the market.

A QF seeking to transfer power to purchasers other than MidAmerican must follow MISO's procedures for requesting transmission service. As noted, the MISO OASIS is available at: http://www.oasis.oati.com/MISO/index.html. The MISO process for securing long-term transmission service can be found at: https://www.misoenergy.org/planning/transmission-planning/long-term-transmission-service-requests/. MidAmerican does not currently have a tariff for service over its distribution system in any of its jurisdictions but will provide wholesale

[17] *See* "Generator Interconnection Queue" at: https://www.misoenergy.org/planning/resource-utilization/GI_Queue/

distribution service to or from the MISO Transmission System on a non-discriminatory basis under rates and terms subject to Commission jurisdiction should such service be requested by a QF.[18]

Finally, MISO has published detailed materials regarding participation in the MISO markets by QFs and other market participants at: https://www.misoenergy.org/markets-and-operations/mp-registration/market-participation/ .

III. ADDITIONAL INTERCONNECTION SERVICE INFORMATION – SECTION 292.310(D)(5)

Section 292.310(d)(5) of the Commission's regulations requires MidAmerican to explain the requirements a QF must follow to execute new interconnection agreements or renegotiate existing agreements in order to make wholesale sales to third party purchasers. Additionally, MidAmerican is required to explain any differences in the requirements for QFs as compared to other generators or generation owned by MidAmerican.

A. New QFs

As already discussed *supra*, since MidAmerican joined MISO, all generators interconnecting to its transmission facilities that are part of the MISO transmission system, including generators owned by MidAmerican, seeking to make wholesale sales to third party purchasers within MISO must follow the MISO interconnection procedures available at: https://www.misoenergy.org/planning/resource-utilization/generator-interconnection/.

The interconnection of generators that interconnect directly to MidAmerican's distribution system (*i.e.,* at a voltage less than 69 kV), including generators owned by MidAmerican, are subject to slightly different processes depending on the jurisdictional nature of

[18] For example, MidAmerican provides wholesale distribution service to certain wholesale load customers. *E.g.,* Dkt. No. ER11-3656.

their interconnections and whether they are seeking to participate in the MISO as a Capacity Resource.

If a new QF plans to interconnect at the distribution level, the interconnection process for QFs is state-jurisdictional if the QF plans to sell its entire output to MidAmerican. Also, QFs that are distributed energy resources in an aggregation, are subject to state-jurisdictional interconnection procedures.[19] If a QF plans to sell power to third parties or wants the right to be able to do so, its interconnection is FERC-jurisdictional.[20] MidAmerican's state interconnection processes are set forth in its state tariffs or applicable guidelines. MidAmerican has posted its guidelines governing state-jurisdictional interconnections to MidAmerican's distribution system at: https://www.midamericanenergy.com/customer-interconnection. Such interconnection service is provided by MidAmerican on a non-discriminatory basis.

MISO has indicated to FERC that "if a QF plans to sell any of its output over the MISO Transmission System then it would be required to adhere to MISO's GIP and obtain a GIA for interconnection service."[21] This same approach is used in PJM, but only if the customer's project has QF status when it enters the PJM queue. In contrast, in most ISOs/RTOs, all distribution interconnections are left to the interconnecting utility, regardless of jurisdiction. MidAmerican is unaware if MISO has dealt with any QFs seeking a FERC-jurisdictional interconnection, but if MISO took the lead on new QFs selling to anyone besides the host utility and required the application of the MISO GIP/GIA, certainly MidAmerican would comply with this approach,

[19] The interconnection of any DER in an aggregation is state-jurisdictional. Order No. 2222-A at PP 42-43.

[20] *Niagara Mohawk Power Corp*., 121 FERC ¶ 61,183 at P 13 (2007)); *modified by Florida Power and Light Co.*, 133 FERC ¶ 61,121 at P 21 (2010).

[21] MISO Responses to Commission Questions at 8, Dkt No. RM18-9 (Oct. 7, 2019).

although it also is willing to provide interconnection service to such QFs under FERC jurisdiction by using the *pro forma* SGIP/SGIA.

If a QF interconnection would impact the MISO Transmission System, it would be treated like any DER having such an impact, and MISO has explained:

> If the Host Distribution Provider, applying its study procedures, determines that the DER may have impacts on the MISO Transmission System, the Host Distribution Provider would inform MISO's interconnection group of those impacts. MISO, as an affected system, would then coordinate with the Host Distribution Provider and impacted Transmission Owner to study the DER's impacts on the MISO Transmission System to determine what facilities or other mitigation are required to remedy the adverse impacts.[22]

Also, if the QF connecting to distribution (or MidAmerican acting on its behalf as a purchaser) sought Capacity Resource status, MISO explains that:

> To inject electricity and participate in the Resource Adequacy construct as a Capacity Resource, the DER must be deliverable to load through the MISO Transmission System. MISO provides two services that a DER must choose between for MISO to study the DER's deliverability: (1) External Network Resource Interconnection Service ("ENRIS"); or (2) firm Transmission Service (either Point-To-Point or Network) from the DER unit to a particular load. If the DER elects to obtain E-NRIS, they must submit an Interconnection Request specifying that the DER is seeking E-NRIS and be studied through MISO's 3-phase [Definitive Planning Phase]. If the DER elects to obtain firm Transmission Service to be deliverable to specific load, then the Interconnection Customer must submit a Transmission Service Reservation ("TSR") and adhere to MISO's TSR study procedures. The requirement to proceed through MISO's DPP for E-NRIS or the TSR study process would not relieve a DER of its obligation to adhere to the requirements of the Host Distribution Provider's interconnection process. MISO provides a set of instructions for interconnecting to

[22] MISO Responses to Commission Questions at 4, Dkt No. RM18-9 (Oct. 7, 2019).

> non-MISO distribution facilities on its website for the benefit of customers.[23]

MidAmerican would be subject to the same rules if it owned QFs.[24]

B. Existing QFs

As to an existing QF, which may be interconnected to distribution or transmission facilities, that QF may already have an interconnection agreement ("IA") with MidAmerican or MISO (depending on the vintage of the interconnection) or it may be interconnected under a power purchase agreement ("PPA") that includes interconnection terms and conditions. In the case of an existing QF with a FERC-jurisdictional IA/GIA, no new interconnection agreement is required to sell to the market. If the existing QF was receiving state-jurisdictional interconnection service under an IA or PPA and seeks to sell to the market, whether voluntarily or because/when its existing PPA has expired, its interconnection service becomes subject to FERC jurisdiction.

In a response to FERC in 2019, MISO stated:

> if a QF that previously sold all of its output to the utility to which it is interconnected becomes able to sell its output to third parties over the MISO Transmission System, as may be the case if a power purchase agreement expires, then such QF would need to submit an Interconnection Request and proceed through MISO's queue.[25]

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[23] *Id.* at 5. *See* MISO instructions for Interconnection Requests to the Distribution System or non-MISO Transmission System within the MISO region, available at, https://cdn.misoenergy.org/Distribution_System_Interconnection_Request_Instructions108140.pdf

[24] Utilities with market-based rates, such as MidAmerican, often do not bother to obtain QFs status for directly-owned QFs, even if it is available.

[25] MISO Responses to Commission Questions at 8-9, Dkt No. RM18-9 (Oct. 7, 2019) (citing *Midwest Indep. Transmission Sys. Operator, Inc.,* 132 FERC ¶ 61,241, P 25 (2010)).

This response, however, seems incorrect to MidAmerican and the case cited does not support such response. In Order No. 2003, FERC addressed the right of QFs to convert to FERC-jurisdictional interconnection service and *avoid* the queue so long as the QF met a "substantially the same" test.[26] Thus, despite its October 7, 2019 response to FERC, MidAmerican expects that MISO would allow an existing QF to convert its IA or the interconnection rights under a PPA to a FERC-jurisdictional GIA, if the QF met the substantially the same test.

In short, interconnection service is available from MISO or MidAmerican for new and existing QFs whether interconnecting to transmission or distribution facilities.

IV. NOTICE TO ALL POTENTIALLY AFFECTED QFS

As required by the Commission's regulations at section 292.310(a)-(c), MidAmerican provides the information described in subsection 292.310(c) in Attachment A or Attachment B for the following entities:

> (1) Those QFs that have existing power purchase contracts with the applicant;
>
> (2) Other QFs that sell their output to the applicant or that have pending self-certification or Commission certification for QF status whereby the applicant will be the purchaser of the QFs output;
>
> (3) Any developer of generating facilities with whom the applicant has agreed to enter into power purchase contracts, as of the date of the application filed pursuant to this section, or are in discussions,

[26] *Standardization of Generator Interconnection Agreements and Procedures*, Order No. 2003, FERC Stats. & Regs. ¶ 31,146 at P 815 (2003) (subsequent history omitted) ("regarding a former QF interconnected to a Transmission System that sells electric energy at wholesale in interstate commerce, we conclude that the owner of the QF need not submit an Interconnection Request if it represents that the output of the generating facility will be substantially the same as before. . . . When the owner of a QF that was formerly interconnected to a Transmission System seeks to sell energy at wholesale and represents that the output of its generator will be substantially the same after conversion, it would be unreasonable for a Transmission Provider to require the former QF to join the interconnection queue.").

> as of the date of the application filed pursuant to this section, with regard to power purchase contracts;
>
> (4) The developers of facilities that have pending state avoided cost proceedings, as of the date of the application filed pursuant to this section; and
>
> (5) Any other QFs that the applicant reasonably believes to be affected by its application filed pursuant to paragraph (a) of this section.

In *Commonwealth Edison Co.*,[27] as well as myriad other cases, the Commission consistently waived the requirement to identify and serve QFs 1.00 MW and under, largely because such QFs do not self-certify.[28] The burden of such identification would be immense in most states due to net metering. Attachment B contains a list of potential QFs whose identities are either masked in the relevant interconnection queue, but have requested a point of interconnection with MidAmerican or are potentially QFs that are otherwise not publicly identified (e.g., QF developers that have expressed interest in QF contracts to MidAmerican). MidAmerican is also serving a copy of this Application on the state commissions in the states where it serves retail customers.

V. EXISTING CONTRACTS

MidAmerican has one or more existing PURPA contracts with >5 MW SPPF QFs in its service territory. PURPA Section 210(m)(6) and Section 292.314 of the Commission's regulations provide that:

> Nothing in this subsection affects the rights or remedies of any party under any contract or obligation, in effect or pending approval before the appropriate State regulatory authority or nonregulated electric utility on the date of enactment of this subsection, to purchase electric energy or capacity from or to sell electric energy or capacity to a qualifying cogeneration facility or qualifying small

[27] 135 FERC ¶ 61,005 (2011).

[28] *Id.* at P 44.

> power production facility under this Act (including the right to recover costs of purchasing electric energy or capacity).

In accordance with these regulations, MidAmerican is not requesting to terminate any existing QF contracts or obtain relief from any obligation to purchase electric energy or capacity from any QF that has an existing contract with MidAmerican. Rather, MidAmerican is seeking relief from any prospective obligations to enter into purchase agreements under PURPA for >5 MW SPPF QFs.

Specifically, the MidAmerican requests that it not be required to enter into any new agreements with >5 MW SPPF QFs, and also requests that it not be required to extend the terms of any existing QF agreements with SPPF QFs over 5 MW upon expiration of a PURPA contract.

VI. VERIFICATION – SECTION 292.310(D)(7)

Section 292.310(d)(7) of the Commission's regulations requires an authorized individual to verify the accuracy and authenticity of the information provided in an application for relief from mandatory QF purchase obligations. Accordingly, verification signed by an authorized representative of MidAmerican is appended to this Application.

VII. CONCLUSION

Wherefore, for the reasons stated herein, MidAmerican respectfully requests to be relieved of its PURPA purchase obligations as described in this filing as of the filing date. Such relief will expand the scope of the Commission's previous termination of MidAmerican's obligation to purchase energy and capacity from QFs with a capacity greater than 20 MW to include QFs with a capacity between 5 and 20 MW.

Respectfully submitted,

/s/ Jeffrey J. Cook
Jeffrey J. Cook
Attorney for the Applicant

Dated this 15th day of July 2025

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

MidAmerican Energy Company) Docket No. QM25-___-000

VERIFICATION

I, Mark D. Lowe, being duly sworn, depose and say that I am the Senior Vice President and General Counsel for MidAmerican Energy Company and have authority with respect thereto. I have read the foregoing Application, and based on my knowledge, information and belief, all of the statements contained therein pertaining to MidAmerican Energy Company are true and accurate.

Mark D. Lowe

Sworn to and subscribed to before
me on this 15th day of July 2025.

Notary Public

LORI L. ANDERSON
Commission Number 705064
My Commission Expires
7-8-29

ATTACHMENT A
List of Qualifying Facilities and Potential Qualifying Facilities (Identity Public)

Name of Facility (Owner Name if different)	QF Docket Number (if any)	Contact Name and Mailing Address	Email Address (if known)	Net Certified Capacity of Facility (MW)	Location of Facility (County & State)	Name and Location of Substation (Cty & St.)[29]	Interc. Status[30]	Expiration Date of Contract (if any)[31]
Metro Methane Recovery Facility-Waste Management of Iowa	QF92-183-000	Jay Maruska 12161 12th Ave NE, Mitchellville, IA 50169	JMaruska@wm.com	6.40	Polk, IA	SE 124th St Substation - 605 SE 124th St, Runnells, IA 50237	Unknown/Distribution	11/12/2026
City of Davenport - Waste Water Treatment Plant	N/A	Doug Hradek 2606 S Concord St, Davenport, IA 52802	doug.hradek@davenportiowa.com	1.64	Scott, IA	Substation 53 - 2101 J M Morris Blvd, Davenport, IA 52802	Unknown/Distribution	11/16/2028
Carroll Area Wind Farm, LLC	QF13-295-002	Justus Getty 4200 Wilson Boulevard, Suite 420 Arlington, VA 22203	ARice@rockcreekenergygroup.com	20.00	Carroll, IA	Templeton Substation - 29994 Hwy 71, Carroll, IA	Unknown/	12/31/2040
Metro Park East Landfill by WM Renewable Energy LLC	QF14-354-000	Jay Maruska 12181 NE 12th Ave, Mitchellville, IA 50169	JMaruska@wm.com	4.80	Polk, IA	SE 124th St Substation - 605 SE 124th St, Runnells, IA 50237	Unknown/Distribution	N/A
Buffalo Prairie Solar, LLC	NA	Donald Zimmerman 495 Jessen Lane Charleston SC 29492	drzim@alder-energy.com	5.00	Illinois City, IL	Substation 112 – 15800 217th St W, Illinois City	Unknown/Distribution - Not Installed	

[29] Subject to change upon completion if project not yet interconnected.

[30] "Unknown" indicates the interconnection predates the ERIS/NRIS concepts or it is interconnected at the distribution level.

[31] "NA" indicates there is no PURPA contract.

ATTACHMENT B

Public Version

Non-public potential projects that could qualify for QF status

[Redacted in its Entirety]