

April 16, 2009

BY: E-Filing

MidAmerican Energy Company Attn: Suzan M. Stewart 401 Douglas Street P.O. Box 778 Sioux City, Iowa 51102 712 277-7587 Telephone 712 252-7396 Fax

Ms. Patricia Van Gerpen South Dakota Public Utilities Commission 500 E. Capitol Avenue Pierre, SD 57501

In Re: Docket No. MS09-001

Dear Ms. Van Gerpen:

The purpose of this letter is to express support for the proposal before the South Dakota Public Utilities Commission ("Commission") in Docket No. MS09-001. This docket, initiated by petition of Commission Staff, proposes to terminate the ongoing information requirement imposed on utilities subject to the Commission's jurisdiction in Docket F-3661, In the Matter of the Public Utilities Commission Investigation into the Cost of Regulation. The information requirement arises from a 1987 investigation by the Commission of utility employee salaries. In its Final Order issued in Docket No. F-3661, the Commission required utilities to annually report employee salaries of \$40,000 and above when 5% or more of a salary is allocated to the State of South Dakota.

MidAmerican Energy Company, successor to Iowa Public Service Company, supports Staff's proposal to eliminate this requirement. Salary levels are a part of a utility's revenue requirement and are typically considered and adjusted in the context of a rate case when new utility rates are established. There does not seem to be an ongoing need by the Commission for annual salary information when it will not directly affect utility rates. Furthermore, at this point in time, only MidAmerican Energy Company is complying with the requirement and each year compliance becomes more burdensome as salaries increase above 1987 levels.

MidAmerican recognizes that information is a key requirement for regulation, but over time the type of information needed for that job changes along with the concerns of regulators. Only infrequently do regulatory authorities decide they can do their jobs with less information. The Commission and its Staff is to be applicated for considering this small matter and eliminating another paperwork requirement.

Very truly yours

Suzan M. Steward

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