MidAmerican ENERGY OBSESSIVELY, RELENTLESSLY AT YOUR SERVICE.

MidAmerican Energy 106 East Second Street P.O. Box 4350 Davenport, Iowa 52808

February 25, 2011

Ms. Patricia Van Gerpen Executive Director South Dakota Public Utilities Commission 500 East Capital Avenue Pierre, SD 57501

Subject: Docket No. NG02-007-Incentive Gas Supply Procurement Plan Filing IGSPP Six-Month Report for May 2010 through October 2010 Request for Confidential Treatment

Dear Ms. Van Gerpen:

MidAmerican Energy Company submits the six-month Incentive Gas Supply Procurement Plan (IGSPP) filing for May 2010 through October 2010 based on the reporting requirements in accordance with Docket No. NG02-007 and previous dockets approved by the South Dakota Public Utilities Commission in Docket Nos. NG95-006 and NG98-010. The Commission approved the continuation of the IGSPP program in Docket No. NG02-007 for a three-year period with an effective date of November 1, 2002, through October 31, 2005.

On October 5, 2005, the Commission issued an order approving MidAmerican's July 13, 2005 filing for a five-year continuance of its IGSPP, without modification, through October 31, 2010, "Final Decision and Order", in Docket No. NG05-007.

Attached are each section of the filing that reflect reference prices, actual costs and savings for the six-month period. The Summary Schedule (Section II, SUM Page 1 of 8) reflects the amount of savings for this reporting period. The Company's portion of the savings is to be included as an IGSPP factor in the monthly Purchased Gas Adjustment calculation for the months of May 2011 through October 2011.

MidAmerican requests this filing be accorded confidential treatment in accordance with South Dakota Public Utilities Commission Rules 20:10:01:39 through 20:10:01:42.

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In accordance with Rule 20:10:01:41, the following information is provided:

(1) Description of Information: Six-Month IGSPP Filing May 2010 through October 2010.

(2) Length of time: Twenty (20) years.

(3) Identification of Contact Person: Cade Simmons, Davenport, IA., (563) 333-8139 or csimmons@midamerican.com

(4) And (5) Statutory and Factual Grounds for Confidential Treatment: The IGSPP filing consists of Summary Schedules, Reference Prices, Actual Gas Costs, and other gas cost information provided for the six-month period. The filing includes trade secrets, which are of significant commercial value to MidAmerican, its customers, and its competitors. The open access of this information to the general public and specifically to other gas suppliers, pipelines, brokers, and customers with fuel switching alternatives, including transportation, could result in increased costs to MidAmerican and its customer when it contracts for gas supplies and gas transportation services.

MidAmerican has expended considerable time and effort in negotiating the terms set forth in the IGSPP filing. If the information set forth in this filing were to be subject to public disclosure, an unfair advantage would result to MidAmerican's competitors and its transportation and potential transportation customers, and others who would not have to exhaust the same resources as was necessary for MidAmerican.

In the present gas industry, such an unfair advantage could give gas purchasers with access to the price information a competitive edge. Such an advantage would work to the detriment of a competitive market and thus, seriously impede the potential benefits derived from the IGSPP. Moreover, MidAmerican's core customers, the potential beneficiaries of the IGSPP, would not realize the potential benefits of the IGSPP. If revealed, it could seriously impact MidAmerican's ability to compete and to negotiate favorable gas purchases. It is therefore confidential and a trade secret as recognized by SDCL 37-29-1(4).

If you have any questions, please contact me at (563) 333-8139 or <u>csimmons@midamerican.com</u> and direct all correspondence to me.

Sincerely,

Cade Simmons Analyst, Regulated Pricing