



MidAmerican Energy Company
106 East Second Street
PO Box 4350
Davenport, Iowa 52808

December 21, 2018

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

Subject: Docket No. NG16-013-Incentive Gas Supply Procurement Plan Filing
IGSPP 12-Month Report for November 2017 through October 2018
Request for Confidential Treatment

Dear Ms. Van Gerpen:

MidAmerican Energy Company submits the 12-month Incentive Gas Supply Procurement Plan (IGSPP) filing for November 2017 through October 2018 based on the reporting requirements in accordance with the Commission's orders issued in Docket No. NG02-007 and previous orders issued 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 approved MidAmerican's July 13, 2005, filing for a five-year continuation of its IGSPP, without modification, through October 31, 2010, in its "Final Decision and Order", issued in Docket No. NG05-007.

On November 16, 2010, the Commission issued an order approving MidAmerican's September 3, 2010, filing for a three-year continuance of its IGSPP, with modification, through October 31, 2013, "Order Approving Incentive Gas Supply Procurement Plan" in Docket No. NG10-008.

On October 15, 2013, the Commission approved MidAmerican's September 6, 2013, filing for a three-year continuation of its IGSPP, without modification, through October 31, 2016, in its "Order Approving Incentive Gas Supply Procurement Plan" issued in Docket No. NG13-005.

On December 12, 2016, the Commission approved MidAmerican's November 7, 2016, filing for a three-year continuation of its IGSPP, without modification, through October 31, 2019, in its "Order Approving Incentive Gas Supply Procurement Plan" issued in Docket No. NG16-013.

Attached is each section of the filing that reflects reference prices, actual costs and savings for the 12-month period. The Summary Schedule (Section II, SUM Page 1 of 14) 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 April 2019 through March 2020.

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

- (1) Description of Information: 12-Month IGSPF Filing November 2017 through October 2018.
- (2) Length of time: Twenty (20) years.
- (3) Identification of Contact Person: Renee White, Davenport, IA., (563) 333-8047 or rdwhite@midamerican.com.
- (4) And (5) Statutory and Factual Grounds for Confidential Treatment: The IGSPF filing consists of Summary Schedules, Reference Prices, Actual Gas Costs, and other gas cost information provided for the 12-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 IGSPF 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 IGSPF. Moreover, MidAmerican's core customers, the potential beneficiaries of the IGSPF, would not realize the potential benefits of the IGSPF. 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) 333-8047 or rdwhite@midamerican.com and direct all correspondence to me.

Sincerely,

/s/ Renee White

Renee White
Rates Analyst, Regulated Pricing

cc: Brian Rybarik – MidAmerican Energy Company