



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

December 27, 2019

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 2018 through October 2019  
Request for Confidential Treatment

Dear Ms. Van Gerpen:

MidAmerican Energy Company submits the 12-month Incentive Gas Supply Procurement Plan (IGSPP) filing for November 2018 through October 2019 based on the reporting requirements in accordance with the Commission's orders issued in Docket No. NG16-013 and previous orders issued in Docket Nos. NG95-006, NG98-010 and NG02-007.

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 2020 through March 2021.

Request for Confidential Treatment:

MidAmerican respectfully 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 IGSPP Filing November 2018 through October 2019.
- (2) Length of time: Twenty (20) years.
- (3) Identification of Contact Person: Renee White, Davenport, IA., (563) 333-8047 or [rdwhite@midamerican.com](mailto:rdwhite@midamerican.com).
- (4) And (5) Statutory and Factual Grounds for Confidential Treatment:

The confidential materials constitute a trade secret and, if released, would result in material damage to MidAmerican's competitive position or give advantage to competitors and serve no public purpose. The IGSPP filing consists of Summary Schedules, Reference Prices, Actual Gas Costs, and other gas cost information provided for the 12-month period, which constitute trade secrets and 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. 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. Such an advantage would work to the detriment of a competitive market and thus, seriously impede the potential benefits derived from the IGSP. Moreover, MidAmerican's core customers, the potential beneficiaries of the IGSP, would not realize the potential benefits of the IGSP. See *e.g.*, *National Parks and Conservation Association v. Morton*, 498 F.2d 765, 768 (U.S.C.A. 1974).

If you have any questions, please contact me at (563) 333-8047 or [rdwhite@midamerican.com](mailto:rdwhite@midamerican.com) and direct all correspondence to me.

Sincerely,

/s/ Renee White

Renee White  
Rates Analyst, Regulated Pricing

cc: Katelyn Lynch-Butcher – MidAmerican Energy Company