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BY: E-filing

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

RE: RM15-001
In the Matter of the Consideration of Rules Regarding Stray Electrical
Current and Voltage Remediation
MidAmerican Energy Company Comments

Dear Ms. Van Gerpen:

MidAmerican Energy Company (MidAmerican) respectfully submits the following comments to the South Dakota Public Utilities Commission (Commission) regarding the proposed stray voltage rules pursuant to the Commission's Order Opening Docket and Establishing Comment Schedule issued on November 18, 2015.

MidAmerican appreciates the Commission's approach for allowing informal initial comments on the proposed rules and the opportunity to provide reply comments. MidAmerican also appreciates Commission Staff's work to developing rules that balance the interests of all stakeholders to implement procedures and policy to remediate stray current and voltage issues. MidAmerican agrees with the overall intent of the rules proposed. The proposed rules provide a strong framework to define the guidelines and expectations for all stakeholders. MidAmerican offers the following comments regarding specific sections of the rules that may require further discussion and explanation.

Potential Clarifications for Consideration

Commission Approved Voltage Training

Proposed Section 20:10:39:03 contemplates a utility will measure or test for stray current. MidAmerican believes it is the intent to allow qualified utility professionals to conduct this work so long as they met the requirements in proposed Section 20:10:39:07. Section

20:10:39:07 (3), however, does not explain what commission approved voltage training would entail or how someone would be aware that commission approved voltage training is available. MidAmerican would be interested in having additional follow-up and explanation on who would offer this training and when it would be offered so that MidAmerican can ensure it has a qualified professional to conduct the testing. MidAmerican would be willing to participate in workshops to discuss the various stakeholder proposals for this training.

Additionally, it may be helpful to have further discussions regarding how costs may be recovered to conduct the testing. Some costs may be considered part of regular training and services, but proposed Section 20:10:39:16 suggests efforts should be made to conduct testing under conditions similar to those conditions existing at the time it is believed stray voltage is a problem. This may mean outside of the normal working hours for utility personnel. MidAmerican would welcome further discussion on whether it is the intent of the Commission to allow utilities to propose various cost recovery options in a future rate case.

20:10:39:22

Proposed Section 20:10:39:21 recognizes that remote reference electrode should be installed within certain distances from equipment when practicable. This qualification regarding the practicability of placing an electrode is not extended to placing an electrode a certain distance from the edge of an electric transmission line right-of-way. MidAmerican suggests that this requirement also be qualified to indicate to the extent conditions allow for the placement of this equipment within 100 feet of the transmission right-of-way. In some circumstances it may not be possible to place equipment within the requirements outlined in the rule, and this qualification would allow certain modifications to be allowed if circumstances do not allow the placement within the outlined parameters.

20:10:39:25

Proposed Section 20:10:39:25 requires a drawing of the dairy be prepared, but the rule does not specify who should prepare the drawing. The Commission may want to consider clarifying the rule so that the dairy owner or operator provides the drawing items related to items (1) through (4); the drawing then should be handed over to the qualified professional conducting the tests to determine items (5) through (7). Additionally, the qualified professional conducting the tests should define the planned test points based on the drawing provided by the dairy owner or operator.

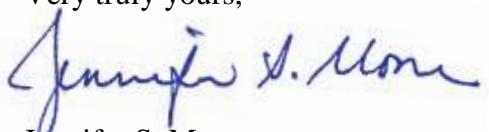
In conclusion, MidAmerican welcomes the opportunity to work with the Commission, Commission Staff and other stakeholders to address these and any other issues that may arise through the rule-making process. MidAmerican respectfully requests the

Ms. Patricia Van Gerpen
South Dakota Public Utilities Commission
Docket No. RM15-001
Page 3 of 3

opportunity to participate in any workshops, public hearings, or other proceedings that may be held in this docket.

Thank you for the opportunity to comment on the proposed rules.

Very truly yours,

A handwritten signature in blue ink that reads "Jennifer S. Moore". The signature is written in a cursive style with a large initial "J".

Jennifer S. Moore
Senior Attorney