



MidAmerican Energy Company
106 East Second Street
P.O. Box 4350
Davenport, Iowa 52808
(563) 333-8006 Telephone
(563) 333-8021 Fax
E-mail: jsmoore@midamerican.com
Jennifer S. Moore
Senior Attorney

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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's Reply Comments

Dear Ms. Van Gerpen:

On December 11, 2015, MidAmerican Energy Company (MidAmerican) submitted 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. Additionally, Xcel Energy (Xcel), Douglas C. Jensen, Northwestern Corporation (Northwestern), the South Dakota Rural Electric Association (SDREA), Montana-Dakota Utilities Company (Montana-Dakota) also filed comments on or about December 11, 2015. The South Dakota Dairy Producers (SDDP) also filed comments on December 21, 2015, noting it would provide additional comments on December 24, 2015, since it did not receive timely notice.

MidAmerican offers these brief reply comments generally in support of the comments provided by the other parties. Specifically, MidAmerican agrees with Xcel's recommendation to use Voltage measurements. Xcel's recommended changes further clarify the testing process. Xcel also offered changes to the formula in proposed rule 20:10:39:57, and MidAmerican supports those suggestions as well as these also clarify the process. Finally, MidAmerican supports Xcel's suggestion that "moist" be stricken from proposed rule 20:10:39:22.

MidAmerican recognizes the SDDP does not support Northwestern's suggested changes to the 48 hour change to 24 hour in the "Testing Sequence" as proposed in 20:10:39:17.

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SDDP contends stray voltage would be identified better over a longer period of time. MidAmerican, however, supports Northwestern's change because suitable data can generally be obtained within a 24 hour period of time to determine the origination and magnitudes of stray voltage within the initial testing period. Northwestern's suggested rule change does not prohibit a utility from conducting the test over a longer duration should the original time period render inconclusive results. Northwestern's change merely adds more flexibility to the testing process.

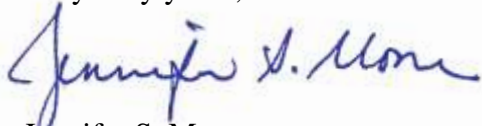
Mr. Jensen suggests that the water service line also be tested for stray voltage. MidAmerican does not object to this proposal and notes proposed rule 20:10:39:25 addresses this concern by requiring cow contact points to be tested. This would any cow contact with any livestock watering devices or any other applicable contact point that may have a water line.

Finally, SDREA offered changes to proposed rule 20:10:39:07 and MidAmerican also supports these changes since they offer further clarification on the qualifications for testing professionals.

MidAmerican looks forward to 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.

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

Very truly yours,



Jennifer S. Moore
Senior Attorney