



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

August 31, 2016

Iowa Utilities Board
Records and Information Center
1375 E. Court Avenue, RM 69
Des Moines, Iowa 50319-0069

RE: MidAmerican Energy Company
Initial Filing

Dear Iowa Utilities Board:

Pursuant to the Iowa Utilities Board's ("Board") July 19, 2016, "Order Directing Filing of Net Metering Tariffs," ("Order") in Docket No. NOI-14-0001, MidAmerican Energy Company ("MidAmerican") submits the following compliance tariffs for filing:

MidAmerican Energy Company

Electric Tariff No. 2

2 nd Revised Sheet No. 1.20	Canceling 1 st Revised Sheet No. 1.20
3 rd Revised Sheet No. 14	Canceling 2 nd Revised Sheet No. 14
2 nd Revised Sheet No. 100	Canceling 1 st Revised Sheet No. 100
1 st Revised Sheet No. 349	Canceling Original Sheet No. 349
1 st Revised Sheet No. 350	Canceling Original Sheet No. 350
1 st Revised Sheet No. 351	Canceling Original Sheet No. 351
1 st Revised Sheet No. 354	Canceling Original Sheet No. 354
1 st Revised Sheet No. 356	Canceling Substitute Original Sheet No. 356
1 st Revised Sheet No. 357	Canceling Original Sheet No. 357
2 nd Revised Sheet No. 363	Canceling 1 st Revised Sheet No. 363
2 nd Revised Sheet No. 364	Canceling 1 st Revised Sheet No. 364
2 nd Revised Sheet No. 365	Canceling 1 st Revised Sheet No. 365
2 nd Revised Sheet No. 366	Canceling 1 st Revised Sheet No. 366
2 nd Revised Sheet No. 367	Canceling 1 st Revised Sheet No. 367
2 nd Revised Sheet No. 368	Canceling 1 st Revised Sheet No. 368
2 nd Revised Sheet No. 369	Canceling 1 st Revised Sheet No. 369
2 nd Revised Sheet No. 370	Canceling 1 st Revised Sheet No. 370
2 nd Revised Sheet No. 371	Canceling 1 st Revised Sheet No. 371
2 nd Revised Sheet No. 372-417	Canceling 1 st Revised Sheet No. 363-417
1 st Revised Sheet No. 478	Canceling Substitute Original Sheet No. 478

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In compliance with the Board's Order, MidAmerican proposes Rate PG Pilot – Net Billing of Private Generation Facilities Pilot ("Rate PG Pilot"), Sheet Nos. 363 – 371. To comply with the Order, MidAmerican started with its currently effective Rate NB – Net Billing of Small Alternate Energy Producers and Small Hydro Facilities ("Rate NB") tariff as a baseline. As directed by the Order, the new Rate PG Pilot tariff makes the following changes to the previously applicable Rate NB tariff:

- Increase the net metering cap from 500 kW to 1 MW (up to 100 percent of the customer's load).
 - In the Order the Board does not specifically define the phrase "up to 100 percent of the customer's load." MidAmerican interprets this limitation to establish a limitation on the size of private generation facility that customers may install. However, a precise determination of this size is unlikely to be available at the time a customer seeks interconnection. Given this, MidAmerican interprets the 100 percent of customer's load to mean the customer's annual energy needs. During the interconnection process, the customer's generation system will be compared to that customer's historical or anticipated annual energy usage. Customers choosing to install generation systems expected to significantly exceed their annual energy usage will have the option to take service under Rate QF – Cogeneration and Small Power Production Facilities ("Rate QF"). Rate AEP – Alternate Energy Production Facilities Contract Provision Offered ("Rate AEP") may also be available if not fully subscribed.
- Allow all customer classes to net meter but specify that each customer's generation will only offset the energy (kWh) charges and thus will not offset the customer charge or demand charge.
- Provide for an annual cash-out of excess credits at MidAmerican's tariffed avoided cost rate.
 - The Order provides that the cash-out will be "at the utility's tariffed avoided cost rate." MidAmerican does not have a single avoided cost rate, but has seasonal and time-of-day avoided cost rates. In order to accommodate the annual cash-out and to provide the customer the benefit of using their private generation credits between seasons and to be compensated at a rate that reflects seasonal and/or time-of-day pricing differences, MidAmerican will utilize blended rates as described in the proposed tariff. The attached spreadsheet, Attachment A, illustrates the calculation of these blended rates.
 - While the Order did not address cash-outs when a customer terminates service, MidAmerican's proposed tariff allows for a cash-out at the time of termination.
- Funds from the cash-out will be divided evenly between the customer and the utilities' funds to provide assistance to customers in need.
 - The default amount donated will be 50 percent. However, MidAmerican's proposed tariff allows customers to elect a contribution amount of 75 or 100 percent.
 - MidAmerican requests the Board clarify the ownership of the default 50 percent donation for tax reporting purposes.

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- Allow existing customers on Rate NB the option to take service under the new tariff.
 - MidAmerican's proposed tariff will not allow a customer to carry over any Net Metering Credits acquired while on Rate NB. While the Order did not address the transfer of Net Metering Credits when an existing net metering customer opts to take service under the new tariff, MidAmerican believes this treatment is consistent with what would happen if an existing Rate NB customer terminated service or switched to Rate QF or Rate AEP. Further, allowing some customers to carry forward credits from the Rate NB tariff would skew the data collected as part of this pilot tariff.
- Include a three year sunset provision.
 - The Order stated that the tariff should include a sunset provision stating that the tariff will expire three years from the date of its approval. MidAmerican has drafted its proposed tariff to sunset three years after its effective date. Tying the sunset date to the effective date, rather than the approval date, will ensure the pilot is in effect for a full three years.
 - Consistent with the Order, MidAmerican's tariff will allow customers participating in the pilot to remain on the tariff for the life of their equipment. However, to avoid a situation where the pilot extends in perpetuity, MidAmerican has added a 20 year term, which is consistent with the contract terms in our current Rate NB tariff.
- Modified language from the Rate NB tariff that required the customer and facility owner to be the same. MidAmerican is removing this requirement from the Rate PG Pilot tariff.

In addition to filing the new tariffs for Rate PG Pilot, MidAmerican also proposes revisions to the following tariffs:

- Sheet No. 1.20 – Updated table of contents to include Rate PG Pilot.
- Sheet No. 14 – Added Rate PG Pilot to the list of rates.
- Sheet No. 100 – Added reference to Rate PG Pilot.
- Sheet No. 349 – Added cut-off date for availability.
- Sheet No. 350 – Added consent statement.
- Sheet No. 351 – Changed the terms “Net Metering Credit” and “Net Billing Credit” to “Private Energy Credit” to match language that will appear on system generated bills.
- Sheet No. 354 – Added reference to 199 Iowa Administrative Code Chapter 15 and corrected a grammatical error.
- Sheet Nos. 356 and 357 – Added references to Rate PG Pilot.
- Sheet Nos. 372-417 – Reserved for future use.
- Sheet No. 478 – Added reference to Rate PG Pilot and corrected typographical errors.

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MidAmerican is requesting an effective date of January 1, 2017, for these tariffs. The delayed effective date will allow MidAmerican more time to develop and implement necessary system changes.

If you have any questions, please contact me at (565) 333-8382 or dlvotino@midamerican.com. All correspondence regarding this matter should also be directed to me.

Sincerely,

/s/ Diane Votino

Diane Votino

Senior Tariff and Compliance Analyst