



March 16, 2009

Ms. Christine Paulson
Iowa Department of Natural Resources
Air Quality Bureau
7900 Hickman Road, Suite 1
Urbandale, Iowa 50322

Re: MidAmerican Energy Company's Request for nitrogen oxide (NOx) allowances from Iowa's Clean Air Interstate Rule Supplemental Compliance Pool.

Dear Ms. Paulson;

Under subrule 34.205(3) of the Iowa Administrative Code, the Iowa Department of Natural Resources (IDNR) may allocate to Clean Air Interstate Rule (CAIR) NOx affected units, for the control period in 2009, up to 6,978 CAIR NOx allowances from the state's supplemental compliance pool. The actual allocation criteria is set forth in 40 Code of Federal Regulations (CFR) section 96.143. Specifically, under 40 CFR 96.143(b), any CAIR NOx affected unit in the state that achieves NOx emission reductions in 2007 and 2008, that are not necessary to comply with any state or federal emissions limitation applicable during such years, may be eligible for and request early reduction credits from the state's compliance supplement pool.

MidAmerican Energy Company's (MidAmerican) total unit NOx reductions for 2007 and 2008 was **40,890 tons** (see attached spreadsheets). The 40,890 tons includes reductions of 13,204 tons from Walter Scott Junior Energy Center, Units 1-3; 21,139 tons from the George Neal facilities, Units 1-4; and 6,547 tons from the Mississippi River Energy Center, which includes both the Louisa and Riverside Generating Stations. Conflicting guidance has been received on whether reductions were required in both 2007 and 2008. MidAmerican is requesting allowances for units that achieved reductions in both years as well as the Walter Scott Junior Energy Center, Unit 2, which had reductions in only 2008. However, if the IDNR determines that reductions were required in both 2007 and 2008, MidAmerican is willing to voluntarily withdraw our application for the 458 allowances associated with Walter Scott Junior Energy Center, Unit 2.

MidAmerican understands that the 6,978 supplemental compliance pool allowances will be prorated since they will be oversubscribed. The actual request for the allowances from the supplemental compliance pool is signed and certified by the designated representative from each facility (see attached spreadsheets).

Please note that all of the MidAmerican units requesting early reduction credits from the supplemental compliance pool are *eligible CAIR NOx affected units*. The baseline years for each unit were calculated by determining the year that the low NOx controls were

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installed for each unit and looking back two prior years to calculate the average pre-control NOx emissions rate for each unit. For each unit, various NOx controls were installed including low NOx burners, overfire air, and or neural networks. The baseline emission rate for each unit and actual heat input for 2007 and 2008 were used to calculate pre-control emissions. The projected emissions at the baseline rate for each unit were compared to the actual emissions in 2007 and 2008 to determine the total unit NOx emissions reduction in tons. The total unit NOx emissions reductions in tons reflect total ownership and do not account for fractional ownership interests in each unit. As the operator and designated representative for each of these facilities, MidAmerican is requesting allowances on behalf of the joint owners.

Thank you for your attention to MidAmerican's request for NOx allowances from Iowa's CAIR supplemental compliance pool. If you or your staff have any questions, or require additional information, please contact Don Mohning, Manager of Air Programs at (712) 277-7461.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Kallen", written in a cursive style.

Jon Kallen

Manager Environmental Policy and Strategy

cc. Catherine Fitzsimmons
Chris Kjellmark
Dana Ralston
Reg Soepnel
Dave Ulozas
Cathy Woollums
Kevin Dodson
Don Mohning

**MidAmerican Energy Company
CAIR Supplemental Compliance Pool
NOx Reduction Calculations
Walter Scott Energy Center**

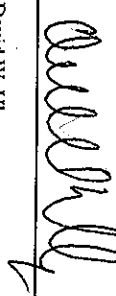
Unit	Baseline Emission Rate		Baseline Years	Projected Emissions @ Baseline Rate		2007 Actual	2008 Actual	2008 Actual	Total Plant 2007-2008 Reductions
	lbs/mmBtu	lbs/mmBtu		2007	2008				
WSECI	0.465	0.460	2004-2005	1,025	758	4,405,779	759	3,297,725	563
WSEC2	0.425	0.400	2006-2007	1,118	1,118	4,405,779	759	5,589,745	660
WSEC3	0.425	0.425	2004-2005	11,148	11,147	52,507,443	4,872	52,500,238	5,139
Total								12,284	13,204

Notes:
Baseline emission rate is the lesser of the applicable emission limit or average of the two years prior to the unit's NOx reduction project.
No reduction is claimed in 2007 for WSEC2 because the NOx reduction project was completed in 2008.

Unit	NOx Baseline Calculations		Baseline Years	Baseline Year 1		Baseline Year 2		Applicable Enforceable Limit		
	Controls Added	Installation Year		lbs/mmBtu	mmBtu	lbs/mmBtu	mmBtu	Baseline Ave	2007	2008
WSECI	LNB	2006	2004-2005	0.47	4,768,676	0.46	4,375,433	0.465	0.50	0.46
WSEC2	LNB/OFA	2008	2006-2007	0.43	6,281,538	0.42	6,521,053	0.425	0.45	0.40
WSEC3	LNB/OFA	2006	2004-2005	0.43	48,280,512	0.42	55,832,515	0.425	0.50	0.46

WSEC ORISPL
1082

I certify under penalty of law that based on information and belief formed after reasonable inquiry, that the statements and information contained in this application are true, accurate, and complete.

Signed  Date 2/27/09
Name David W. Uozas

MidAmerican Energy Company
CAIR Supplemental Compliance Pool
NOx Reduction Calculations
Louisa Generating Station & Riverside Generating Station

Unit	Baseline Emission Rate		Baseline Years	Projected Emissions @ Baseline Rate		2007 Actual	2008 Actual	Total Plant	
	2007	2008		2007	2008			2007-2008	Reductions
Louisa	0.310	0.310	2003-2004	6,050	7,640	38,983,923	49,231,162	4,605	5,529
Riverside	0.373	0.373	2001-2002	1,454	1,342	7,805,010	7,207,737	891	1,019
								Total	6,547

Notes:
 Baseline emission rate is the lesser of the applicable emission limit or average of the two years prior to the unit's NOx reduction project.

Unit	NOx Baseline Calculations			Applicable Enforceable Limit					
	Controls Added	Installation Year	Baseline Years	Baseline Year 1	Baseline Year 2	Baseline Ave	2007	2008	
Louisa	LNB/OFA	2005	2003-2004	0.30	48,112,993	0.32	51,819,846	0.310	0.50
Riverside	Neural Net	2003	2001-2002	0.35	5,875,752	0.39	7,564,889	0.373	0.45
Facility	ORISPL								
Louisa	6664								
Riverside	1081								

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Signed  Date 2/27/2009
 Name Reginald R. Soepnel

**MidAmerican Energy Company
CAIR Supplemental Compliance Pool
NOx Reduction Calculations
George Neal North & George Neal South**

Unit	Baseline Emission Rate		Baseline Years	Projected Emissions @ Baseline Rate		2007 Actual	2008 Actual	2007-2008 Total Plant Reductions
	2007 lbs/mmBtu	2008 lbs/mmBtu		2007 Tons	2008 Tons			
Neal N 1	0.962	0.962	2004-2005	5,036	5,173	10,470,627	2,624	4,962
Neal N 2	0.375	0.375	2005-2006	3,235	3,715	17,239,017	2,767	1,881
Neal N 3	0.455	0.455	2002-2003	8,747	7,758	38,488,541	4,599	7,922
Neal S 4	0.354	0.354	2003-2004	8,413	8,513	47,557,334	5,130	6,375
				Total				21,139

Notes:
Baseline emission rate is the lesser of the applicable emission limit or average of the two years prior to the unit's NOx reduction project.

Unit	NOx Baseline Calculations			Applicable Enforceable Limit				
	Controls Added	Installation Year	Baseline Years	Baseline Year 1 lbs/mmBtu	Baseline Year 2 mmmBtu	Baseline Ave lbs/mmBtu	2007 lbs/mmBtu	2008 lbs/mmBtu
Neal1	OFA	2006	2004-2005	0.92	9,797,458	1.00	0.962	NA
Neal2	LNB/OFA	2007	2005-2006	0.41	19,244,737	0.34	0.375	0.46
Neal3	LNB/OFA	2004	2002-2003	0.46	29,860,021	0.45	0.455	0.46
Neal4	LNB/OFA	2005	2003-2004	0.37	40,179,827	0.34	0.354	0.46

Facility **ORISPL**
George Neal North 1091
George Neal South 7343

I certify under penalty of law that based on information and belief formed after reasonable inquiry, that the statements and information contained in this application are true, accurate, and complete.

Signed  Date 3/13/09
Name Dana M. Ralston