



**Meeting with the Office of Information and Regulatory Affairs
July 1, 2015**

Berkshire Hathaway Energy (“BHE”) supported the Clean Power Plan as it was proposed in June 2014, including the building block and flexible compliance concepts. Our businesses have been proactive in reducing their carbon footprints; renewables and non-carbon generation currently make up more than 30% of our generating capacity.

BHE believes the rule should maintain the general approach and goals of the original proposal without significant changes in the final emission targets and in a manner that ensures flexibility for the states in implementing their plans, recognizing we are supportive of the important discussion regarding the phase-in of the building blocks beginning in 2020. The key issue fundamental to our continued support of the Clean Power Plan relates to Building Block 3 – Renewables.

BHE supports the regional approach to calculating the renewables component of the Best System of Emission Reduction but recognizes that state-specific application of the compliance obligations is necessary. The calculation of a “technical/economic potential” of renewables to contribute to establishing a state’s emission target in the final rule should be calculated based on all the following elements:

1. Consideration of renewable integration costs, transmission projects, land use restrictions, species considerations and other relevant factors;
2. Technical potential established on a regional basis, not a state-by-state basis; and,
3. Utilization of retail sales to apportion the regional goal to each state.

While implementation of the final rule is likely to be extremely challenging, it represents a critical step in moving forward on a national basis toward managing carbon emissions. We believe the 2030 targets, as they were proposed, can be met and meaningful emission reductions achieved.

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