

February 10, 2021

***VIA ELECTRONIC FILING***

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503-1036

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State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**RE: Docket UE-21 \_\_\_\_\_—Affiliated Interest Filing—PacifiCorp and BNSF Railway Company**

Under the provisions of RCW 80.16.020 and in accordance with WAC 480-100-245, PacifiCorp dba Pacific Power & Light Company (PacifiCorp), provides notice of an affiliated interest transaction with BNSF Railway Company (BNSF) for two “License for Electric Supply Line Across or Along Railway Property” permits (collectively, the Licenses).

Permit #20-67041 will allow PacifiCorp to construct and maintain an electric supply line containing a maximum of three (3) conductors, together with its supporting or containing structures across or along BNSF’s rail corridor at or near the station of Klamath Falls, County of Klamath, State of Oregon, Line Segment 0639, Mile Post 1.55. Whereas Permit #20-6744 will allow PacifiCorp to construct and maintain an electric supply line containing a maximum of three (3) conductors, together with its supporting or containing structures across or along BNSF’s rail corridor at or near the station of Klamath Falls, County of Klamath, State of Oregon, Line Segment 0640, Mile Post 0.98. A verified copy of each proposed permit is included with this Notice as Attachment A and Attachment B respectively. Also included with this filing is a verification from Imogen Taylor, Senior Property Agent, regarding the Licenses.

PacifiCorp is a wholly owned indirect subsidiary of Berkshire Hathaway Energy Company (BHE). BHE is a subsidiary of Berkshire Hathaway, Inc. BNSF is also a subsidiary of Berkshire Hathaway, Inc. RCW 80.16.010 includes in its definition of “affiliated interest”, “every corporation five percent or more of whose voting securities are owned by any person or corporation owning five percent or more of the voting securities of such public service company or by any person or corporation in any such chain of successive ownership of five percent or more of voting securities.” Therefore, the ownership interest of Berkshire Hathaway, Inc., in BHE and in BNSF creates an affiliated interest relationship between PacifiCorp and BNSF.

BNSF uses standardized pricing for these types of permits. PacifiCorp will pay a total of \$21,952 for the Licenses, which include application fees, permit fees, and insurance. Obtaining the Licenses is in the public interest because it allows PacifiCorp to reconductor line facilities at or near the Klamath Falls station. This work is necessary to prevent a circuit overload, which would result in loss of power to PacifiCorp’s customers in the Klamath County area for an unacceptable length of time. Without the Licenses, PacifiCorp cannot meet its obligation to provide safe and reliable electric service. As the property owner, BNSF is the only entity that can provide the Licenses to PacifiCorp.

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It is respectfully requested that all formal correspondence and Staff requests regarding this material be addressed to:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah St Ste 2000  
Portland OR 97232-2152

Please contact Ariel Son at (503) 813-5410 if you have any informal questions.

Sincerely,

          /s/          

Etta Lockey  
Vice President, Regulation  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, Oregon 97232-2152  
(503) 813-5701  
[etta.lockey@pacificorp.com](mailto:etta.lockey@pacificorp.com)

Enclosures

NEW-PPL-Attach-A-2-10-21.pdf

NEW-PPL-Attach-B-2-10-21.pdf

NEW-PPL-Verification-Taylor-2-10-21.pdf