

December 19, 2019

VIA ELECTRONIC FILING

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Executive Director and Secretary
Washington Utilities and Transportation Commission
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12/19/19 16:50
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UTIL. AND TRANSP.
COMMISSION

RE: DO NOT REDOCKET Docket UE-161311—Affiliated Interest Filing—Marmon Utility, LLC

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 ordinary course affiliated interest transactions from time to time between PacifiCorp and Marmon Utility, LLC DBA Hendrix Aerial Cable Systems (Marmon Utility).

In December 2016, PacifiCorp filed a notice that it was entering into a Master Materials Supply Contract with Marmon Utility for aerial cable system design, supply, and installation services (Master Contract). The Master Contract is set to expire on December 31, 2019. PacifiCorp desires to amend the Master Contract with Marmon Utility to extend the terms of the Master Contract through December 31, 2020 (Amendment). A copy of the proposed Amendment is included with Attachment A.

PacifiCorp is a wholly-owned indirect subsidiary of Berkshire Hathaway Energy (BHE). BHE is a subsidiary of Berkshire Hathaway Inc. (Berkshire). Berkshire currently holds a majority interest in The Marmon Group. The Marmon Group consists of approximately 185 companies, divided into fifteen business sectors including engineered wire and cable, industrial products and building wire. Marmon Utility is a member of The Marmon Group.

RCW 80.16.020 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, Berkshire’s ownership interest in BHE and The Marmon Group creates an affiliated interest relationship between PacifiCorp and Marmon Utility.

Marmon Utility manufactures electrical distribution cable, cable systems, and accessories for aerial and underground utility applications. Among the items manufactured by Marmon Utility is covered “spacer cable.” Spacer cable is designed to be resilient to incidental contact (e.g. animals, fallen trees and limbs), have increased strength in the event of impact loads, and be tolerant to transient events such as lightning. In response to increasing concerns related to wildfires, PacifiCorp is actively taking steps to construct, maintain, and operate its electrical

