

December 13, 2013

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Attn: Stephen V. King
Executive Director and Secretary

RE: Docket No. UE-101053—Affiliated Interest Filing—PacifiCorp and HomeServices Relocation

Dear Mr. King:

Under the provisions of RCW 80.16.020 and in accordance with WAC 480-100-245, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) provides notice of an affiliated interest transaction between PacifiCorp and HomeServices Relocation (HomeServices). PacifiCorp previously submitted notice of an affiliate transaction between the Company and Homeservices on June 11, 2010 (Docket No. UE-101053). The contract submitted with the notice contains a provision allowing for the extension of the contract. The contract term has been extended, effective January 1, 2014. A copy of the First Amendment to the Relocation Services Contract is included as Attachment A.

PacifiCorp is a wholly-owned subsidiary of MidAmerican Energy Holdings Company (MEHC). HomeServices is a limited liability company and privately held company, which is a wholly-owned subsidiary of HomeServices of America, Inc. In turn, HomeServices of America, Inc., is a wholly-owned subsidiary of MEHC. 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, HomeServices is an affiliate of PacifiCorp pursuant to RCW 80.16.010.

For the current Relocation Services Contract (Contract), MEHC selected HomeServices through a Request for Proposal (RFP) process designed to elicit the most comprehensive relocation services package at a reasonable cost. MEHC subsidiaries have the option to sign onto the Contract and receive the same terms and conditions as MEHC. After determining the terms and conditions to be reasonable, PacifiCorp has opted to sign onto the Amendment. Under the terms of the Contract, HomeServices will manage comprehensive relocation services for PacifiCorp’s transferring employees and new hires and will directly bill PacifiCorp for expenses incurred. The terms and conditions, and pricing structure remain the same as under the previous contract,

except the term is extended to December 31, 2015, and the business ethics provisions are modified.

As part of its management service, HomeServices assigns a personal relocation consultant to each relocating employee or new hire to coordinate departure and destination services. Departure services include personalized needs assessment; for homeowners, home marketing plan design, evaluation and negotiation of offers, and closing and settlement assistance; household goods survey; thirty-day notice to landlords for renters; and car and hotel reservations. Destination services include providing real estate agent information, housing and community information, area tours, cost of living analyses, and school reports; home buying search, negotiation and closing assistance; for renters, rental property search; temporary living; rental car coordination; partner/spouse career assistance and counseling; household goods moving and storage; and overlapping mortgage payment assistance. HomeServices will provide these services through its network of preferred vendors and service providers.

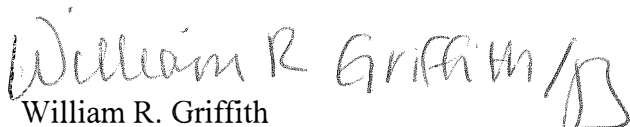
HomeServices will charge PacifiCorp a modest, flat fee per relocation for its services, plus the actual costs of services procured from its vendors and service providers. The fee HomeServices charges for its services is comparable to or lower than fees charged by other companies that offer relocation management services. PacifiCorp expects to pay HomeServices \$400 per relocation managed. The base fee per transaction is \$1,600, which will be discounted by \$600 if HomeServices receives a fee from the real estate selling agent, and discounted by another \$600 if HomeServices receives a fee from the real estate buying agent. For this fee, HomeServices negotiates discounted rates for many of the services it provides through third-party vendors, such as household goods shipping and storage. HomeServices will bill PacifiCorp for the cost of the third-party services without markup.

To meet staffing needs, PacifiCorp occasionally relocates existing employees and new hires. PacifiCorp offers relocation services to its eligible employees and new hires as part of total employee compensation to offset the expense of relocating and to ensure a smooth transition to the new position. The Contract allows PacifiCorp to purchase these services at a discount. For these reasons, the Contract is reasonable and meets the public interest.

Included with this filing is a notarized verification from Michelle R. Mishoe, Senior Counsel, Pacific Power, regarding the First Amendment to the Relocation Services Contract.

Please direct any informal inquiries to Bryce Dalley, Director, Regulatory Affairs and Revenue Requirement at (503) 813-6389.

Sincerely,


William R. Griffith
Vice President, Regulation

Enclosures