



August 27, 2020

VIA ELECTRONIC FILING

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

RE: Docket UE-151343—Affiliated Interest Filing—FlightSafety

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 FlightSafety International, Inc. (FlightSafety).

FlightSafety offers a variety of aviation training services, including training for pilots, flight attendants, and customer service workers. PacifiCorp intends to use the flight simulator training services offered by FlightSafety that is specific to the navigation system used in PacifiCorp's aircraft. PacifiCorp herewith submits a confidential copy of the Master Professional Services Contract between Berkshire Hathaway Energy Company and FlightSafety and the affiliate participation letter (Agreement) between the parties in accordance with WAC 480-07-160. Attachment A contains commercially-sensitive information, which if disclosed, could expose PacifiCorp to competitive harm and cause increased costs. Additionally, PacifiCorp is bound by the Agreement to maintain its confidentiality.

PacifiCorp is a wholly-owned indirect subsidiary of Berkshire Hathaway Energy Company (BHE), which in turn is a subsidiary of Berkshire Hathaway, Inc. FlightSafety is also a subsidiary of Berkshire Hathaway, Inc. 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, the ownership interest of Berkshire Hathaway, Inc., in FlightSafety and BHE creates an affiliated interest for PacifiCorp.

PacifiCorp owns aircraft used for its operations and employs pilots to fly the aircraft. The Federal Aviation Administration (FAA) requires that all pilots take flight simulator training at least once per year, and BHE requires pilots to take training every nine months. PacifiCorp's aircraft uses a specific navigation system on which FlightSafety offers the required training.

BHE issued an aggregate competitive tender seeking proposals for pilot training services. The services are to include the provision of initial, recurrent ground school and simulator training on Garmin navigation system, testing, and checking for the FAA, Flight Inspection Services pilots in aircraft types, hours specified, suppliers, services, and processes in accordance with Title 14 Code of Federal Regulations (CFR) Part 61, 135, and 142. FlightSafety proved the sole bidder to

