

October 8, 2015

***VIA ELECTRONIC FILING***

***AND OVERNIGHT DELIVERY***

Steven V. King  
Executive Director and Secretary

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

**RE: Docket UE-15\_\_\_\_—Affiliated Interest Filing—Graver Water Systems Inc.**

Under the provisions of RCW 80.16.020 and in accordance with WAC 480-100-245, Pacific Power & Light Company, a division of PacifiCorp (PacifiCorp or Company), provides notice of the below-noted ordinary course affiliated interest transaction with Graver Water Systems Inc. (Graver).

PacifiCorp is a wholly-owned indirect subsidiary of Berkshire Hathaway Energy Company (BHE). BHE is a subsidiary of Berkshire Hathaway Inc. (Berkshire). Berkshire currently holds a majority interest in The Marmon Group (Marmon). Marmon comprises three autonomous companies consisting of thirteen diverse stand-alone business sectors. Graver is part of one of the three such autonomous companies, Marmon Retail Technologies Company, in the water technologies sector.

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, Berkshire Hathaway, Inc.’s ownership interest in BHE and Marmon creates an affiliated interest relationship between PacifiCorp and Graver.

Graver designs, manufactures, and markets water and wastewater treatment systems. Additionally, Graver provides control systems integration, instrumentation, mechanical, and laboratory analysis services.

A tank that was supplied by Graver in 1974 is used at PacifiCorp’s Jim Bridger facility. Graver is the original equipment manufacturer of the tank. The manway cover door of the tank must be replaced, and it was determined that Graver is the company best-suited to replace the door, as requesting that other companies design a door for the tank would be time-and cost-prohibitive. PacifiCorp plans to purchase from Graver a replacement manway cover door and related yoke with bolts for the tank at its Jim Bridger facility in accordance with the terms of the Purchase Order (Purchase Order), for an approximate purchase price of $667.00. A copy of the Purchase Order is included with this Notice as Attachment A.

The Purchase Order was prepared in accordance with PacifiCorp’s procurement policies and procedures and contains standard commercial terms and conditions to protect the Company’s ability to provide safe and reliable service. Thus, the use of Graver as supplier of the products under the Purchase Order will not harm the public interest.

Also included with this filing is a notarized verification from Jeff Erb, Assistant General Counsel, Pacific Power, regarding the Purchase Order.

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

By E-Mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center

PacifiCorp

825 NE Multnomah Street, Suite 2000

Portland, Oregon, 97232

Please contact Ariel Son, Manager, Regulatory Projects, at 503-813-5410 if you have any informal questions.

Sincerely,

R. Bryce Dalley

Vice President, Regulation

Enclosures

**WASHINGTON AFFILIATED INTEREST FILING**

**ATTACHMENT A**

**Purchase Order**

**WASHINGTON AFFILIATED INTEREST FILING**

**VERIFICATION**

**VERIFICATION**

I, Jeffery B. Erb, am Assistant General Counsel of Pacific Power and am authorized to make this verification on its behalf. Based on my personal knowledge about the attached Purchase Order, I verify that the Purchase Order is a true and accurate copy of the original.

I declare upon the penalty of perjury, that the foregoing is true and correct.

Executed on \_\_\_\_\_\_\_\_\_\_\_ \_\_, 2015 at Portland, Oregon.

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Jeffery B. Erb

Assistant General Counsel

Pacific Power

Subscribed and sworn to me on this \_\_\_ day of October, 2015.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Notary Public for Oregon

My Commission expires: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_