

November 17, 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—Marmon Utility, LLC**

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 Marmon Utility, LLC (Marmon Utility). PacifiCorp plans to purchase the below-noted power cable equipment from Marmon Utility, which is a Marmon company and a Berkshire Hathaway Energy Company (BHE) affiliate.

PacifiCorp is a wholly-owned indirect subsidiary of 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, including Marmon Utility.

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 Marmon Utility.

Marmon Utility manufactures aerial spacer cable systems, molded polymer insulators and vise top insulators, and TR-XLPE insulated, medium voltage power cables rated 15kV to 35kV.

PacifiCorp plans to perform reliability improvements for three of its transmission circuits located in Walla Walla, Washington, and in Pendleton and Portland, Oregon. It was determined that the best method for improving reliability at those locations was to “reconductor” sections of those circuits with a spacer cable system. Marmon Utility is the only company that produces the type of spacer cable system that is required for these transmission circuits. No other manufacturer produces a similar system for installation.

Marmon Utility spacer cable systems improve reliability to customers at a lower cost than other alternatives (such as, in this case, underground construction). The insulated conductor is held in a close construction which makes it more resilient to a variety of events, including incidental contact from tree branches, lightning, and animals.

PacifiCorp plans to purchase from Marmon Utility the required installation materials, job support, and installation equipment for two crossing projects (located in Walla Walla, Washington, and Pendleton, Oregon) and one reconductor project (located in Portland, Oregon) in accordance with the terms of certain purchase orders (Purchase Orders), for an approximate purchase price of $87,121.00. A copy of the Purchase Orders is included with this Notice as Attachment A.

The Purchase Orders were 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 Marmon Utility as supplier of the products under the Purchase Orders will not harm the public interest.

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

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

By E-Mail (preferred): 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 OrderS**

**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 Orders, I verify that the Purchase Orders are a true and accurate copy of the originals.

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 November, 2015.

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Notary Public for Oregon

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