

February 11, 2020

**VIA ELECTRONIC FILING**

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

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State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**RE: Docket No. UE-\_\_\_\_\_—Affiliated Interest Filing—PacifiCorp and HomeServices Relocation**

Under the provisions of RCW 80.16.020 and in accordance with WAC 480-100-245, PacifiCorp d/b/a Pacific Power and Light Company (PacifiCorp or the Company), provides notice of ordinary course affiliated interest transactions from time to time between PacifiCorp and HomeServices Relocation, LLC (HomeServices).

PacifiCorp is a wholly-owned subsidiary of Berkshire Hathaway Energy Company (BHE). HomeServices is a limited liability company, which is a wholly-owned subsidiary of HomeServices of America, Inc. HomeServices of America, Inc. is a wholly-owned subsidiary of BHE. 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, BHE’s ownership interest in PacifiCorp and HomeServices of America, Inc. creates an affiliate interest relationship between PacifiCorp and HomeServices.

PacifiCorp previously submitted notice to this Commission of a similar affiliate interest agreement between the Company and HomeServices on June 11, 2010 (Docket No. UE-101053) and November 17, 2015 (Docket No. UE-152212). BHE and HomeServices entered into a new Participation Letter for an updated Master Professional Services Contract (Contract) for Employee Relocation Services on February 11, 2020, under which BHE subsidiaries have the option to sign onto the Contract and receive the same terms and conditions as BHE. The Contract is, in essence, a renewal of the existing contractual arrangement established between the parties under the prior contract. After determining the terms and conditions to be reasonable, PacifiCorp has opted to sign onto the Contract.

A copy of the Master Professional Services Contract for Employee Relocation Services is included as Attachment A. A copy of PacifiCorp’s Participation Letter is included as Attachment B.

Under the terms of the Contract, HomeServices will assist new and existing PacifiCorp employees when relocating to a new position within the Company. HomeServices will create a

moving cost bid, provide movers, arrange temporary housing, provide real estate services and ensure all expenses are in line with Company policy. HomeServices will directly bill PacifiCorp for expenses incurred.

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 PacifiCorp service territory is one of the largest in the United States and requires the relocation of new and existing employees from time to time to meet the needs of our customers.

A competitive bid process was utilized to determine the lowest cost vendor who could provide the services required. In order to secure the best pricing possible, PacifiCorp along with other BHE affiliates, completed an aggregated competitive tender ensuring the lowest cost provider was selected, in line with PacifiCorp's needs and expectations.

Outsourcing this function at the BHE level allows PacifiCorp to minimize expense to customers, as opposed to performing these tasks internally. Performing these functions internally would require the training and development of new talent, negotiating moving and real estate contracts and performing additional auditing services. Utilizing HomeServices for relocation services, on the other hand, provides the lowest cost to the Company, and ultimately customers. HomeServices is a full-service provider that assists employees with moving of household, sale of previous house and/or termination of lease, arranging travel and temporary housing and ensuring compliance with Company policies regarding relocation expenses. For these reasons, the Contract is reasonable and meets the public interest.

Also included with this filing is a notarized verification from Ajay Kumar, Senior Attorney, Pacific Power, regarding the Contract and Participation Letter.

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

By email (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.

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Sincerely,

          /s/          

Etta Lockey

Vice President, Regulation

Pacific Power & Light Company

825 NE Multnomah St., Suite 2000

Portland, Oregon 97232

(503) 813-5701

[etta.lockey@pacificorp.com](mailto:etta.lockey@pacificorp.com)

Enclosures

NEW-PPL-Attach-A-2-11-20.pdf

NEW-PPL-Attach-B-2-11-20.pdf

NEW-PPL-Verification-Kumar-2-11-20.pdf