

March 13, 2025

VIA ELECTRONIC FILING

Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503-1036

UE-250167
Received
Records Management
Mar 13, 2025

Re: Docket UE-_____—Affiliated Interest Filing—PacifiCorp and BNSF Railway Company

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 BNSF Railway Company (BNSF) to secure the following three “License for Electric Supply Line Across or Along Railway Property” permits (collectively, the Licenses). Also included with this filing is a verification from Imogen R. Taylor, Senior Property Agent, regarding the Licenses.

Permit #24W-22112 will allow PacifiCorp to construct and maintain an electric supply line containing a maximum of six (6) conductors, one (1) fiber optic line, and one (1) neutral line, together with its supporting or containing structures (collectively, the "Electric Supply Line"), across or along BNSF's rail corridor at or near the station of Walla Walla, County of Walla Walla, State of Washington, Line Segment 0451, Mile Post 33.91. Accompanying this Notice as Attachment A is a verified copy of the proposed Permit #24W-22112.

Permit #24W-23672 will allow PacifiCorp to construct and maintain an electric supply line containing a maximum of six (6) conductors, one (1) fiber line, and one (1) neutral (copper) line, together with its supporting or containing structures (collectively, the "Electric Supply Line"), across or along BNSF's rail corridor at or near the station of Walla Walla, County of Walla Walla, State of Washington, Line Segment 0451, Mile Post 33.94. Accompanying this Notice as Attachment B is a verified copy of the proposed Permit #24W-23672.

Permit #24W-23844 will allow PacifiCorp to construct and maintain an electric supply line containing a maximum of six (6) conductors, one (1) neutral, and one (1) fiber optic wireline together with its supporting or containing structures (collectively, the "Electric Supply Line"), across or along BNSF's rail corridor at or near the station of Walla Walla, County of Walla Walla, State of Washington, Line Segment 0450, Mile Post OPP 5.94. Accompanying this Notice as Attachment C is a verified copy of the proposed Permit #24W-23844.

PacifiCorp is a wholly owned indirect subsidiary of Berkshire Hathaway Energy Company (BHE). BHE is a subsidiary of Berkshire Hathaway, Inc. BNSF is also a subsidiary of Berkshire Hathaway, Inc. 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, the ownership interest of Berkshire Hathaway, Inc., in BHE and in BNSF creates an affiliated interest relationship between PacifiCorp and BNSF.

BNSF uses standardized pricing for these types of Licenses. PacifiCorp will pay \$13,673 for Permit #24W-23672; and \$9,973.00 for each of Permit #24W-22112 and Permit #24W-23844. These amounts include payment of the application fee, railroad protective liability insurance fee, and license fee (to which 3-4% credit card convenience fees will be added) for each of the 25-year Licenses. Costs paid for the Licenses would be recorded (capitalized or expensed) as part of the costs to construct, reconstruct, operate, maintain, relocate, enlarge, alter, and remove transmission power lines. Transmission costs are allocated to Washington customers using the system generation (SG) allocation factor under the Washington Inter-Jurisdictional Allocation Methodology (WIJAM), which is currently approximately 8 percent. Therefore, of the \$33,619 cost for the three Licenses, approximately \$2,689.52 would be allocated to Washington customers.

Obtaining these Licenses is in the public interest because acquiring them will allow PacifiCorp to cross BNSF’s right of way with reconducted transmission line. Without the Licenses, PacifiCorp cannot meet its obligation to provide safe and reliable electric service to its customers. As the property owner, BNSF is the only entity that can provide the Licenses to PacifiCorp.

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

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center Pacific Power
825 NE Multnomah St Ste 2000
Portland OR 97232-2152

Please contact Ariel Son at (503) 813-5410 if you have any informal questions.

Sincerely,

 /s/

Robert Meredith
Director of Pricing & Tariff Policy
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, Oregon 97232-2152
(503) 813-5017
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Enclosures

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NEW-PAC-Attachment-B-3-13-25.pdf

NEW-PAC-Attachment-C-3-13-25.pdf

NEW-PAC-Verification-3-13-25.pdf