

March 13, 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 No. UE-111596(1)—Supplemental Affiliate Interest Filing for An Intercompany Mutual Assistance Agreement**

Dear Mr. King:

Under the provisions of RCW 80.16.020 and in accordance with WAC 480-100-245, Pacific Power & Light Company, a division of PacifiCorp (Pacific Power or Company), provides supplemental notice of an affiliate interest agreement with the rate-regulated subsidiaries of Berkshire Hathaway Energy Company (BHE). PacifiCorp previously entered into an Intercompany Mutual Assistance Agreement (Agreement) with MidAmerican Energy Company, Kern River Gas Transmission Company and Northern Natural Gas Company in September 2011. Pacific Power filed notice with the Washington Utilities and Transportation Commission (Commission) of this affiliate agreement September 1, 2011, which became the above-referenced docket.

BHE acquired NV Energy, Inc. (NVE), in December 2013, which is another rate-regulated subsidiary of BHE. It was determined that NVE and the other parties to the Agreement may benefit from including additional rate-regulated BHE subsidiaries to the pool of participants in the Agreement. The Agreement has been amended to allow for inclusion of other rate-regulated BHE subsidiaries as parties. Additionally, the provisions for limitations on liability and indemnification have been deleted. The parties to the Agreement will provide mutual assistance under the terms and conditions of an applicable regional mutual aid agreement, which contain such provisions. Including them in the Agreement is duplicative and creates the potential for conflicting terms of providing assistance. All other terms and conditions remain the same. A copy of the First Amended Intercompany Mutual Assistance Agreement By And Between Rate-Regulated Subsidiaries Of Berkshire Hathaway Energy Company (Amendment) is included with this supplemental notice as Attachment A.

As stated in the original notice, the Agreement is similar in structure to the Intercompany Administrative Services Agreement (IASA) used by BHE and its subsidiaries to share administrative services[[1]](#footnote-1) and is intended to be an additional tool for responding to emergencies. Under the Agreement, a party needing assistance may request it of another party or parties. Such parties may choose whether or not to provide the requested assistance.

All aspects of providing assistance from Pacific Power’s perspective will be governed by the Edison Electric Institute Mutual Aid Agreement, the Western Region Mutual Assistance Agreement, or other such agreements that may be customarily used in the region where the assistance is being provided, except for the reimbursement of costs. Reimbursement of costs will be governed by Article 4 of the Agreement, which generally provides that goods will be reimbursed at the replacement cost and services will be reimbursed as a direct charge, service charge or allocation as applicable under the IASA. Pacific Power provided copies of the Edison Electric Institute Mutual Aid Agreement and the Western Region Mutual Assistance Agreement for the Commission’s information with the notice originally filed in this docket.

Also included with this filing is a notarized verification from Michelle R. Mishoe, Senior Counsel, Pacific Power, regarding the Amendment.

Please contact Natasha Siores, Director of Regulatory Affairs and Revenue Requirement, at (503) 813-6583 with any questions.

Sincerely,

R. Bryce Dalley

Vice President, Regulation

Enclosure

**ATTACHMENT A**

**FIRST AMENDED INTERCOMPANY MUTUAL ASSISTANCE AGREEMENT**

**BY AND BETWEEN RATE-REGULATED SUBSIDIARIES OF**

**BERKSHIRE HATHAWAY ENERGY COMPANY**

**WASHINGTON AFFILIATED INTEREST FILING**

**VERIFICATION**

**VERIFICATION**

I, Michelle R. Mishoe, Senior Counsel, Pacific Power, am authorized to make this verification on its behalf. Based on my personal knowledge about the attached First Amended Intercompany Mutual Assistance Agreement By And Between Rate-Regulated Subsidiaries Of Berkshire Hathaway Energy Company, I verify that the First Amended Intercompany Mutual Assistance Agreement By And Between Rate-Regulated Subsidiaries Of Berkshire Hathaway Energy Company 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.

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

Michelle R. Mishoe

Senior Counsel

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

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

Notary Public for Oregon

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

1. The Commission approved the IASA as part of its approval of [BHE’s] acquisition of PacifiCorp. See Order 07, as modified by Order 08, Docket UE-051090. [↑](#footnote-ref-1)