



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

August 22, 2022

VIA ELECTRONIC FILING

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

Received
Records Management
08/22/2022
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: Docket UE-22 _____—Affiliated Interest Filing—PacifiCorp and U.S. Bank National Association

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 U.S. Bank National Association (USB) to enter into an affiliate agreement (Joinder) to a master professional services contract for corporate payment card services between Berkshire Hathaway Inc., PacifiCorp’s ultimate parent, and USB (collectively the Agreement). A verified copy of the Agreement is included with this Notice as Confidential Attachment A. PacifiCorp provides this Agreement as confidential in accordance with WAC 480-07-160 as it contains sensitive pricing and cost information which, if disclosed to the public, could erode the Company’s ability to bargain with vendors in the future.

PacifiCorp is a wholly owned indirect subsidiary of Berkshire Hathaway Energy Company. In turn, Berkshire Hathaway Energy Company is a direct subsidiary of Berkshire Hathaway Inc. (Berkshire). U.S. Bank National Association, is the wholly owned banking subsidiary of U.S. Bancorp in which Berkshire has an approximate 8.5% voting ownership interest. 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’s ownership of both Berkshire Hathaway Energy Company and U.S. Bancorp creates an affiliated interest relationship between their respective subsidiaries PacifiCorp and USB.

U.S. Bank National Association is engaged in the business of general banking. Commercial and consumer lending services are principally offered to customers within the company’s domestic markets, to domestic customers with foreign operations, and to large national customers operating in specific industries. Its services include traditional credit products, credit cards and similar products. As financial best practice dictates Berkshire has sought to integrate among its subsidiaries certain corporate service products whenever practical for cost savings. In line with this effort a solicitation was issued for payment card services. It was competitively bid on with USB emerging as the best bidder. Under the master professional service contract with USB, as a joinder participant, PacifiCorp will benefit from lower costs and higher rebates compared to its

Washington Utilities and Transportation Commission

August 22, 2022

Page 2

existing contract(s) for the same services. This fiscal prudence will permit PacifiCorp to continue to reliably serve its customers and, thus this transaction with USB is in the public's interest.

Also included with this filing is a verification regarding the Agreement from Stephanie L. Kitchen, commodity manager, Berkshire Hathaway Energy Company.

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
PacifiCorp
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/

Shelley McCoy

Director, Regulation

PacifiCorp

825 NE Multnomah Street, Suite 2000

Portland, Oregon 97232-2152

(503) 813-5292

shelley.mccoy@pacificorp.com

Enclosures

NEW-PAC-Attachment-A-8-22-2022(C).pdf

NEW-PAC-Attachment-A-8-22-2022(R).pdf

NEW-PAC-US-Bank-NA-Contract-Verification-8-22-2022.pdf