

April 21, 2020

VIA ELECTRONIC FILING

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

Received
Records Management
04/21/20 16:53
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

RE: Docket UE-20_____—Affiliated Interest Filing—PacifiCorp and BYD Americas

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 BYD America Corporation (BYD America) to purchase hand sanitizer necessary for its COVID-19 preparedness efforts. The purchase of this hand sanitizer will occur via nine purchase orders, the terms of which include PacifiCorp's Purchase Order Standard Terms and Conditions (Agreement). PacifiCorp provides the Agreement associated with this transaction as confidential in accordance with WAC 480-07-160. The Agreement contains sensitive pricing information which, if disclosed to the public, could erode the company's bargaining power in the future. A copy of the Agreement is included as Confidential Attachment A.

PacifiCorp is a wholly-owned indirect subsidiary of Berkshire Hathaway Energy Company (BHE). BHE is a subsidiary of Berkshire Hathaway, Inc (Berkshire Hathaway). Berkshire Hathaway holds a 24.59% interest in BYD America. Global Healthcare Product Solutions LLC is a subsidiary of BYD America. 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 BYD America creates an affiliated interest relationship between the PacifiCorp and BYD America.

PacifiCorp has an obligation to provide safe and reliable service to its customers. The company also has an obligation to protect its employees and to provide them with personal protective equipment when necessary. Entering into the Agreements with BYD America is in the public interest because it supports the company's coronavirus preparedness efforts and allows it to provide employees with hand sanitizer, when needed, so they can safely perform their work. Using hand sanitizer minimizes employee exposure to the COVID-19 virus, which in turn helps to maintain a healthy workforce. If employees do not have adequate protective equipment, it could negatively impact PacifiCorp's ability to meet customer needs. PacifiCorp is sourcing hand sanitizers from all available suppliers who have quantity on hand to fulfill the company's requirements.

Washington Utilities and Transportation Commission

April 21, 2020

Page 2

Also included with this filing is a verification from Joe Hickey, Managing Director, Procurement, regarding the Agreement.

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 Street, Suite 2000
Portland, Oregon, 97232

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

Sincerely,

_____/s/____

Michael Wilding
Director, Regulatory Policy and Net Power Costs
Pacific Power & Light Company
825 NE Multnomah St., Suite 2000
Portland, Oregon 97232

NEW-PPL-Agreement-A-4-21-20 (C)

NEW-PPL-Agreement-A-4-21-20 (R)

NEW-PPL-Verification-4-21-20