



825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

April 19, 2021

**VIA ELECTRONIC FILING**

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503-1036

Received  
Records Management  
04/19/21 13:11  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

**RE: Docket UE-21 \_\_\_\_\_—Affiliated Interest Filing— PacifiCorp and Bridger Coal 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 Bridger Coal Company (Bridger) for a *First Amendment to Lease Agreement* (Agreement). The Agreement will amend the existing property lease to allow for an extension of the lease for up to [REDACTED] years. The original Lease Agreement is dated May 27, 1981 and provided the terms by which Bridger leases certain real property, which is located in the East Half of the East Half of the Southeast Quarter (E/2E/2SE/4) of Section 25, Township 21 North, Range 101 West, 6th PM, Sweetwater County, Wyoming. The subject property is jointly owned by PacifiCorp and Idaho Power Company. Bridger, leases portions of the property to access its facilities and has a continuing need to do so. A verified copy of the Agreement, along with the original lease, is included with this Notice as Confidential Attachment A. Also included with this filing is a verification from Erik M. Carlson, Senior Property Specialist, regarding the Agreement. PacifiCorp provides the Agreement as confidential in accordance with WAC 480-07-160. The Agreement 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.

Bridger is 66.7% owned by Pacific Minerals, Inc., which in turn is a wholly-owned direct subsidiary of PacifiCorp. (The other 33.3% of Bridger is owned by Idaho Power Company, successor in interest to Idaho Energy Resources Co. and a wholly-owned direct subsidiary of IDACORP.) 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, PacifiCorp’s ownership interest in Bridger creates an affiliated interest relationship between PacifiCorp and Bridger.

The Agreement replaces Section 2 of the lease in its entirety with the following:

[REDACTED]

Washington Utilities and Transportation Commission

April 19, 2021

Page 2



Market lease value was determined through a review and analysis of comparable parcels for sale in the area.

Approving the amendment to the lease is in the public interest because it gives Bridger continued access to the property – access necessary for Bridger to carry out its operations in service to its customers. Moreover, PacifiCorp will financially benefit from the amended lease. As the property’s owners, PacifiCorp along with Idaho Power Company are the only entities that can provide the amended lease to Bridger.

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  
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/

Shelley McCoy  
Director, Regulation  
PacifiCorp  
825 NE Multnomah Street, Suite 2000  
Portland, Oregon 97232-2152  
(503) 813-5292  
[shelley.mccoy@pacificorp.com](mailto:shelley.mccoy@pacificorp.com)

Enclosures

NEW-PPL-Attach-A-4-19-21 (C).pdf  
NEW-PPL-Attach-A-4-19-21 (R).pdf  
NEW-PPL-Verification-Carlson-4-19-21.pdf