

August 20, 2019

via eFiling

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street N.E.
Washington, DC 20426

Re: PacifiCorp, Docket No. ER19-_____-000
Certificate of Concurrence to NorthernGrid Funding Agreement

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act,¹ Part 35 of the Federal Energy Regulatory Commission's regulations², and Order No. 714,³ PacifiCorp submits a Certificate of Concurrence, as Rate Schedule No. 746, to the NorthernGrid Funding Agreement. The Funding Agreement was filed with the Commission on August 20, 2019, in Docket No. ER19-2650-000.

I. Description of Filing

On August 20, 2019, NorthWestern Corporation, as the designated filing company, filed the NorthernGrid Funding Agreement for Planning Cycle 2020–2021 under the Joint Tariff Filing procedures outlined in Order No. 714. The Funding Agreement was designated as NorthWestern Rate Schedule No. 327.⁴ Under these procedures, when multiple utilities are parties to the same tariff, the joint tariff may be filed by a single designated utility, and any non-designated utilities must submit a certificate of concurrence and a single tariff page containing the name of the tariff and the utility designated to file the joint tariff on behalf of the other utilities.⁵ Consistent with Order No. 714, PacifiCorp submits the attached Certificate of Concurrence for the Funding Agreement filed by NorthWestern in Docket No. ER19-2650-000. In addition, PacifiCorp includes a single tariff page incorporating the Funding Agreement by reference into its eTariff database. PacifiCorp requests the Commission accept the single tariff page as Rate Schedule No. 746.

¹ 16 U.S.C. § 824d.

² 18 C.F.R. Part 35.

³ *Electronic Tariff Filings*, Order No. 714, 124 FERC ¶ 61,270, P 63 (2008), *final rule*, Order No. 714-A, 147 FERC ¶ 61,115 (2014).

⁴ NorthWestern Corporation, FERC FPA Electric Tariff, Other Rate Schedules, Rate Schedules – Montana, RS 327 – NorthernGrid Funding Agreement.

⁵ Order No. 714, at PP 61–63.

II. Effective Date & Waiver

As described in the transmittal letter submitted by NorthWestern,⁶ the applicants request an effective date of October 31, 2019, for the Funding Agreement. PacifiCorp respectfully requests that the Commission accept this Certificate of Concurrence to also be effective October 31, 2019. To the extent necessary, PacifiCorp requests that the Commission waive any additional requirements of Part 35 of the Commission's regulations, including any prior notice requirement, in order to allow this effective date.

III. Filing Information

This filing includes the following documents:

- 1) This transmittal letter;
- 2) Certificate of Concurrence; and
- 3) Single tariff record incorporating by reference the NorthernGrid Funding Agreement, identified as PacifiCorp Rate Schedule No. 746.

IV. Communications

Communications concerning this filing should be directed to the following representatives:

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⁶ Accession No. 20190820-5130.

Conclusion

PacifiCorp respectfully requests that the Commission accept the NorthernGrid Funding Agreement for Planning Cycle 2020–2021, as requested by NorthWestern, and also requests the Commission accept the single tariff page submitted in this filing as PacifiCorp Rate Schedule No. 746.

Respectfully Submitted,

/s/ Karen J. Kruse
Karen J. Kruse
Attorney for PacifiCorp

ATTACHMENT 1
Certificate of Concurrence

PacifiCorp

United States of America
Federal Energy Regulatory Commission

Certificate of Concurrence of
PACIFICORP

This is to certify that PacifiCorp assents to and concurs in the rate schedule described below, which NorthWestern Corporation has filed, and hereby files this Certificate of Concurrence in lieu of the filing of the rate schedule specified.

Joint Tariff Name: NorthernGrid Funding Agreement

PACIFICORP Rate Schedule No.: 746

Designated Filing Company (DFC): NorthWestern Corporation

DFC Tariff Title: FERC FPA Electric Tariff, Other Rate Schedules

DFC Program: Electric TCS and MBR

DFC Tariff Record: Rate Schedule 327, RS 327 – NorthernGrid Funding Agreement

Respectfully submitted,

PACIFICORP

/s/ Karen J. Kruse

Karen J. Kruse

Dated: August 20, 2019

PacifiCorp

Rate Schedule No. 746

Joint Tariff Name: NorthernGrid Funding Agreement

Designated Filing Company (DFC): NorthWestern Corporation

DFC Tariff Title: FERC FPA Electric Tariff, Other Rate Schedules

DFC Tariff Program: Electric TCS and MBR

DFC Tariff Record: Rate Schedule No. 327, RS 327 – NorthernGrid Funding Agreement