

Pacific Power Rocky Mountain Power PacifiCorp Transmission



October 5, 2015

California Public Utilities Commission 505 Van Ness Avenue San Francisco, CA 94102 Utah Public Service Commission Heber M. Wells Building, 4th Floor 160 East 300 South Salt Lake City, UT 84111

Idaho Public Utilities Commission 472 W. Washington Boise, ID 83702 Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive S.W. P.O. Box 47250 Olympia, WA 98504-7250

Public Utility Commission of Oregon 201 High Street SE, Suite 100 Salem, OR 97301 Public Service Commission of Wyoming 2515 Warren Avenue, Suite 300 Cheyenne, WY 82002

RE: PacifiCorp—Idaho Power Asset Exchange Update Docket No. UP 315

In December 2014, PacifiCorp¹ and Idaho Power Company filed applications with each of their state commissions and Federal Energy Regulatory Commission (FERC) for approval of an exchange of certain transmission assets. PacifiCorp and Idaho Power are pleased to notify the commissions that they have now obtained necessary approvals, with the docket numbers and the approval dates shown below.

FERC—Docket Nos. EC15-54-000, ER15-683-000, ER15-686-000, ER15-680-000, and ER15-681-000—June 17, 2015 California—Application (A.)14-12-022—August 27, 2015 Idaho—Case Nos. PAC-E-14-11 and IPC-E-14-41—June 5, 2015 Oregon—Docket No. UP 315—June 9, 2015 Utah—Docket No. 14-035-150—Notice; No commission approval required Washington—Docket UE-144136—September 24, 2015 Wyoming—Docket Nos. 20000-465-EA-14 and 20005-35-EA-14—August 7, 2015

PacifiCorp and Idaho Power plan to close the transaction on October 30, 2015. This will allow the companies to begin operating under the new agreements by November 4, 2015.

Within 60 days after closing, there will be a net book value true-up and the companies will provide final accounting entries to FERC and the Oregon, Washington, and Wyoming state commissions as required by the approval orders. PacifiCorp and Idaho Power recently became aware of guidance issued by the Internal Revenue Service (IRS) relating to §1031 tax-deferred

¹ PacifiCorp does business in California, Oregon, and Washington as Pacific Power and in Idaho, Utah, and Wyoming as Rocky Mountain Power.

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like-kind exchange transactions (§1031 Exchange). The IRS advised utility taxpayers who are parties to a §1031 Exchange to remove the tax-depreciation-related accumulated deferred income tax liability (ADIT) associated with the exchanged assets from rate base to avoid noncompliance with existing IRS normalization requirements. PacifiCorp, Idaho Power, and their respective external auditors and tax advisors agree that the final accounting for the associated transmission asset exchange will require entries to comply with the new IRS guidance. The expected practical effect of the entries will be an increase of rate base resulting from the removal of ADIT related to the exchanged assets, and no change to the calculation of the income tax provision for regulatory or financial accounting purposes. These anticipated entries will be reflected in the final accounting entries associated with the transaction, and will be filed with FERC and certain state commissions as required in the final orders approving the transaction.

For questions regarding this matter, please contact Bryce Dalley at Pacific Power, Jeff Larsen at Rocky Mountain Power, or Tim Tatum at Idaho Power. Our contact information is shown below.

Sincerely,

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