



Pacific Power |
Rocky Mountain Power
825 NE Multnomah
Portland, OR 97232

August 29, 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 IPC-PAC Joint Ownership and Operating 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 the attached updated Certificate of Concurrence, as Rate Schedule No. 708, to a recent amendment that was filed by Idaho Power Company to the Idaho Power Company - PacifiCorp Joint Ownership and Operating Agreement ("JOOA") on August 29, 2019, in Docket No. ER19-2704-000.

I. Description of Filing

The description and history of the JOOA is aptly summarized in the transmittal letter accompanying Idaho Power's submission in Docket No. ER19-2704. Idaho Power serves as the "designated filer" of the JOOA. Consistent with the Commission's Joint Tariff Filing Procedures outlined in Order No. 714,⁴ PacifiCorp submitted a certificate of concurrence and a single tariff page in Docket No. ER16-507, which the Commission accepted via delegated letter order in that same docket on December 22, 2015. The present concurrence filing addresses both the recent amendments submitted by Idaho Power in Docket No. ER19-2704, and also updates the concurrence to cover any subsequent revisions to the JOOA in the future.

II. Effective Date & Waiver

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 Order No. 714, at PP 61-63.

As described in the transmittal letter submitted by Idaho Power,⁵ the parties respectfully request that the Commission establish an effective date of 60 days after the date of this filing for these changes to the JOOA, in accordance with 18 C.F.R. § 35.3(a)(1). To the extent that any filing requirement in Part 35 of the Commission's regulations is not satisfied by this filing and the materials enclosed herewith, PacifiCorp respectfully requests waiver of such requirements.

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 Joint Ownership and Operating Agreement, as it may be revised from time to time, identified as PacifiCorp Rate Schedule No. 708.

IV. Communications

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

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Conclusion

PacifiCorp respectfully requests that the Commission accept the IPC-PAC Joint Ownership and Operating Agreement, as requested by Idaho Power Company, and also requests the Commission accept the concurrence submitted in this filing.

Respectfully Submitted,

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

⁵ Accession No. 20190829-5116.

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 Idaho Power Company has filed, and hereby files this Certificate of Concurrence in lieu of the filing of the rate schedule specified.

Joint Tariff Name:	IPC-PAC Joint Ownership and Operating Agreement, Rate Schedule FERC No. 158 under Idaho Power Company's Rate Schedules Tariff
PACIFICORP Rate Schedule No.:	708
Designated Filing Company (DFC):	Idaho Power Company
DFC Tariff Title:	FERC FPA Electric Tariff, IPCo eTariff
DFC Program:	Electric TCS and MBR
DFC Tariff Record:	Rate Schedule 708, IPC-PAC Joint Ownership and Operating Agreement
Limitations to Incorporation by Reference:	None (shall concur with all subsequent variations of agreement)

Dated: August 29, 2019

PACIFICORP
Rate Schedule 708

Joint Tariff Name:	IPC-PAC Joint Ownership and Operating Agreement, Rate Schedule FERC No. 158 under Idaho Power Company's Rate Schedules Tariff.
Designated Filing Company (DFC):	Idaho Power Company
DFC Tariff Title:	FERC FPA Electric Tariff, IPCo eTariff
DFC Program:	Electric TCS and MBR
DFC Tariff Record:	Rate Schedule 708, IPC-PAC Joint Ownership and Operating Agreement.
Limitations to Incorporation by Reference:	None (shall concur with all subsequent variations of agreement)