

September 6, 2017

***VIA ELECTRONIC FILING***

Utah Division of Public Utilities  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attention: Chris Parker, Director

Re: Docket No. 17-999-01 PacifiCorp Common Stock Dividend Notice  
**Internal Controls for Compliance with Dividend Notification**

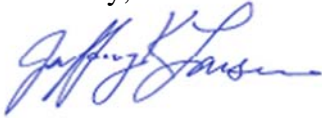
In follow-up to discussions between Rocky Mountain Power and the Division of Public Utilities on September 1, 2017, this correspondence outlines the internal processes and controls that are being implemented to ensure future compliance with the requirement for notification of a declaration of a dividend as required by UCA 54-4-27-(2)(a).

Attached is the New Control Template for the office of the PacifiCorp Corporate Secretary for the internal process to comply with UCA 54-4-27. This process establishes a task to annually obtain the estimated schedule for dividends from PacifiCorp Treasury. In short, the Corporate Secretary will then communicate the estimated schedule to Rocky Mountain Power Regulation, among other internal personnel, and create date ticklers in calendars based on the estimated schedule for dividend declarations. The office of the Corporate Secretary will prepare draft notices at the same time dividend resolutions are prepared for the PacifiCorp Board of Directors. The notices will be finalized and filed with the Utah Public Service Commission following execution of the dividend resolutions by the Board of Directors.

To supplement this process by the Corporate Secretary, Rocky Mountain Power Regulation has added tasks to its Compliance Management System (CMS) for dividend notifications. CMS tracks on-going compliance tasks with a tickler report issued weekly to regulation personnel for upcoming due dates. Specifically, Regulation has added a new task in January to annually confirm receipt of the estimated schedule for dividends from the Corporate Secretary. New tasks will be created for the year based on the estimated schedule of dividends. Additional backstop tasks have been added at the times during the year that notices have historically been issued—February, May, and August—to verify with the Corporate Secretary whether a declaration of dividends is expected, even if not on the schedule identified in January.

Please feel free to contact me if you have any questions about these processes and controls.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey K. Larsen". The signature is fluid and cursive, with the first name "Jeffrey" and last name "Larsen" clearly distinguishable.

Jeffrey K. Larsen  
Vice President, Regulation

cc: Public Service Commission of Utah  
Michele Beck, Office of Consumer Services

## **New Control Template**

**Name:** C365\_\_ – Regulatory Notice of Common Stock Dividends

**Statutory Reference:** Utah Code Annotated 54-4-27(2)(a) *et al*

**Frequency:** Periodic

**Start Date:** September 1, 2017

**Owner:** Jessica Zahnow

**Assignee:** Jeff Erb

**Interested:** Joelle Steward and Bob Lively, RMP Regulation; Nikki Kobliha, CFO, Frank Grey and Anne Kohls, Pacific Power Legal

Task Starts anew each January 10. Task becomes Critical 7 days before due.

### **Description of the Internal Control:**

1. By January 10 of every calendar year, Assignee will request from PacifiCorp Treasury an estimated schedule of the proposed common stock and preferred stock dividends for the coming calendar year.
2. Assignee will distribute the proposed schedule from Step #1 above to Interested Persons.
3. Assignee will then take those dates and calculate the Utah PSC Notification deadline, based on the proposed dividend declaration dates, consistent with UCA 54-4-27(2)(a).
4. Owner will then input the dates from Step #2 above, with a 10 day cushion, into the Outlook Calendar System via a date tickler sent to all Assignees and Interested persons listed above.
5. As the dividend resolutions are prepared, before they are sent to the PacifiCorp Board, Assignee will also draft the UPSC notice and send that draft to the Interested Parties, for additional coordination and confirmation of UPSC Notice filing due date.
6. Once the dividend resolutions are fully executed by the PacifiCorp Board of Directors, Assignee, with oversight Interested, will sign the UPSC Notice and send it to PacifiCorp Regulation for timely filing within the UCA 54-4-27(2)(a) compliance window.
7. In addition to this control, Rocky Mountain Power Regulation will have a second, redundant, control to assure compliance with the requirements of UCA 54-4-27(2)(a).

### **Evidence:**

Confirmation email to Assignees and Interested Persons after Step #5 that the regulatory notice has been timely filed.