BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of PacifiCorp (U-901-E) and MidAmerican Energy Holdings Company for Exemption Under Section 853(b) from the Approval Requirements of Section 854(a) of the Public Utilities Code with Respect to the Acquisition of PacifiCorp by MidAmerican.	Application 05-07-010

ADMINISTRATIVE LAW JUDGE'S RULING DIRECTING FILING OF ADDITIONAL INFORMATION

On October 15, 2025, PacifiCorp d/b/a Pacific Power (PacifiCorp) filed a petition to modify Decision (D.) 06-09-032 (Petition). No party filed a response or protest to the Petition.

To aid the Commission's consideration of the Petition, PacifiCorp is directed to file the following additional information within 21 days of the issuance of this ruling:

1. In its Petition, PacifiCorp requests to amend California-specific Commitment C-16 of D.06-09-032 to reduce the minimum equity level requirement for PPW Holdings from 44 to 35 percent of MidAmerican Energy Holding Company's Total Capital.[1]

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[1] Petition at 1-4.

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a. What would be the implications if the minimum equity level requirement for PPW Holdings remained at 44 percent?

b. Describe the impact on PacifiCorp's capital structure if PPW Holdings' equity level is reduced to the proposed minimum of 35 percent.

c. Describe any potential impacts on financing costs and PacifiCorp's financial condition if PPW Holdings' equity level is reduced below 44 percent, and maintained at, or near, the requested minimum of 35 percent.

2. In D.06-02-033, as modified by D.06-09-032, the Commission approved two broad categories of commitments governing the transfer of control of PacifiCorp, including 'California-specific Commitments' and 'General Commitments' that apply to all six states in which PacifiCorp operates.[2] California-specific Commitment C-16, which is the subject of PacifiCorp's Petition, reflects the same common equity capital thresholds that are described in General Commitment 19(a). Further, General Commitment 19(d) provides "[t]he Commission, on its own motion or at the request of any party, may reexamine the minimum common equity percentages as financial conditions or accounting standard warrant."[3]

a. Has PacifiCorp filed petitions in any of the other states in which it operates to request authority to reduce PPW Holdings' current common equity threshold?

i. If yes, identify the states in which PacifiCorp has filed the petitions, the proposed amendments, and the status of the petitions.

ii. If no, explain why PacifiCorp has not requested the same changes to the minimum common equity

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[2] D.06-02-033 at 8-9, 36-43, and Appendix D; D.06-09-032, Appendices B and C.

[3] D.06-02-033, Appendix D at D-5 through D-6, D-30; D.06-09-032, Appendix B at B-4 and B-14.

percentages approved in the other states in which PacifiCorp operates, and why the lower minimum common equity threshold should be limited to PacifiCorp's California operations.

b. In the event PacifiCorp's Petition is granted, are any further amendments needed to General Commitment 19(a)? Why or why not?

3. In its Petition, PacifiCorp states PPW Holdings' consolidated capital structure equity level is expected to fall below the current 44 percent threshold due to PacifiCorp's accrual of substantial wildfire liabilities as well as the additional capital needed to maintain PacifiCorp's transmission and distribution (T&D) system.[4]

a. Please explain, in greater detail, the level of wildfire liabilities PacifiCorp has/is expected to accrue, as well as the additional capital needed to maintain PacifiCorp's T&D system, and how and when these costs are expected to impact PPW Holdings' minimum equity percentage threshold.

IT IS RULED that PacifiCorp is directed to file responses to the questions set forth in this ruling within 21 days of the issuance of this ruling.

Dated January 20, 2026, at San Francisco, California.

/s/ EHREN D. SEYBERT
Ehren D. Seybert
Administrative Law Judge

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[4] Petition at 4-5, Declaration of Ryan Weems at 2-3.