

**DECLARATION OF ETTA LOCKEY (PACIFICORP)
BUSINESS CONTINUITY AND COVID-19 RESPONSE PLANS**

1. My name is Etta Lockey. My business address is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232.
2. I am Vice President, Regulation, for PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company). PacifiCorp is a multi-jurisdictional utility providing electric retail service to customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp serves approximately 45,000 customers in portions of Del Norte, Modoc, Shasta, and Siskiyou Counties in northern California.
3. This declaration is based on my information and belief and is submitted in accordance with General Order (GO) 66-D of the California Public Utilities Commission (Commission).
4. Section 3.2 of GO 66-D provides that when a utility submits documents for which it seeks confidential treatment to the Commission or staff of the Commission outside of a formal proceeding, the utility must mark the document or applicable portions confidential and provide the basis for confidential treatment specified. Additionally, any such request must be accompanied by a declaration signed by an officer of the requesting company. On March 20, 2020, Alice Stebbins, Executive Director of California Public Utilities Commission requested information from all California utilities regarding business continuity and COVID-19 response plans. PacifiCorp's response includes two confidential documents. As a result, PacifiCorp is providing this declaration along with the confidential information.
5. PacifiCorp is asserting a claim of confidentiality with respect to "Confidential Attachment 1 - COVID-19 Assessment and Workplace Disinfection

Guideline” and “Confidential Attachment 2 –COVID-19 Return to Work Policy” which are attachments included with PacifiCorp’s response to this request. These attachments contain internal proprietary corporate policy information regarding PacifiCorp’s human resources processes and controls. This confidential information is not generally available to the public and public release of this information would hinder PacifiCorp’s ability to proactively and continually update policies as the company’s response rapidly evolves.. The company considers these types of process control documents to be commercially sensitive trade secrets. For these reasons, the data in the attachments constitutes confidential trade secret information that is protected from disclosure under California law.¹

6. Information regarding requests for disclosure of the information for which PacifiCorp seeks confidential treatment should be directed to the following individuals:

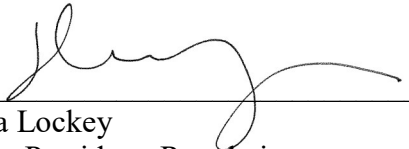
California Dockets
PacifiCorp
californiadockets@pacificorp.com

Pooja Kishore
PacifiCorp
Regulatory Affairs Manager
pooja.kishore@pacificorp.com

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct.

Executed in Portland, Oregon on March 27, 2020.

¹ Cal. Gov’t Code §§6254 *et. seq.*, e.g. Cal Gov’t Code §6254(e), Cal. Gov’t Code §6254(k), Cal Evid. Code §1060, and §6255(a) (based on “the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record”).



Etta Locky
Vice President, Regulation
PacifiCorp