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May 12, 1993

SECRET / 111111

Federal Elections Commission
Office of General Counsel
999 E Street, NW
Washington, D.C. 20463

Re: Amendment to Pacific Power & Light Company
Employee Political Action Committee Statement of
Organization

TO WHOM IT MAY CONCERN:

This office represents Pacific Power & Light Company ("PP&L"). On behalf of PP&L, this letter requests an advisory opinion from the Federal Elections Commission ("Commission").

PP&L is an operating division of PacifiCorp. Currently, PP&L operates a separate segregated fund known as the Pacific Power and Light Company Employee Political Action Committee ("PAC"). The FEC Identification Number of the PAC is C000082800. The PAC's address, treasurer's name, and custodian of record, and the bank in which the PAC deposits funds and holds accounts is on record with the Commission.

The PAC's connected organization is PP&L. PP&L and PacifiCorp would like to change the name of the PAC's connected organization from PP&L to PacifiCorp. The name of the PAC would also change to the "PacifiCorp Federal Political Action Committee." The PAC's affiliated committees, the PAC's custodian of records, the PAC's treasurer, the PAC's assistant treasurer, the membership of the PAC's Board of Directors, and the PAC's bylaws would also change.

The PAC asks the Commission whether the name of the PAC, the name of the PAC's connected organization, and the other information listed above can be changed by amending the PAC's Statement of Organization or whether PacifiCorp must establish a new separate segregated fund in order to form the PacifiCorp Federal Political Action Committee?

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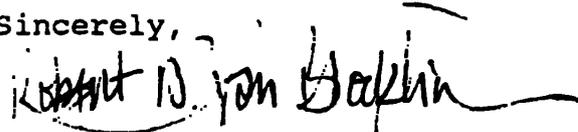
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Federal Elections Commission
May 12, 1993
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All questions about and the Commission's written response to this inquiry should be directed to the Committee's legal counsel: Stoel Rives Boley Jones & Grey, 900 SW Fifth Avenue, Suite 2300, Portland, Oregon 97204, ATTN Margaret D. Kirkpatrick and Robert D. Van Brocklin. Ms. Kirkpatrick can be reached by telephone at (503) 294-9339. Mr. Van Brocklin can be reached by telephone at (503) 294-9660.

Thank you for your prompt attention to this request.

Sincerely,



Robert D. Van Brocklin

cc: Board of Directors of Pacific Power & Light Company
Employee Political Action Committee
Mr. Mark Easley, PAC Treasurer
Mr. Thomas J. Imeson
Mr. Kevin Lynch
Ms. Gail King
Margaret D. Kirkpatrick, Esq.

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June 2, 1993

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Mr. Michael Marinelli
Office of the General Counsel
Federal Elections Commission
999 E Street, NW
Washington, D.C. 20463

AOR 1993-07

Re: Amendment to Pacific Power & Light Company
Employee Political Action Committee (FEC
Identification Number C00082800) Statement of
Organization

Dear Mr. Marinelli:

The purpose of this letter is to respond to your inquiry regarding our May 12, 1993 FEC advisory opinion request on behalf of the Pacific Power & Light Company Employee Political Action Committee ("Committee"). A copy of that request is attached for your reference.

You asked me to describe the relationship between PacifiCorp and Pacific Power & Light Company ("PP&L"). You also asked me to explain why the changes described in our request letter are being proposed.

PP&L is a public electric utility company originally formed as a Maine corporation in 1910. In 1984, PP&L changed its name to PacifiCorp, but continued to do business under the assumed business name of Pacific Power & Light Company. In 1989, PacifiCorp, still a Maine corporation, merged with an Oregon corporation named PC/UP&L Merging Corp. At the same time, Utah Power & Light Company also merged with PC/UP&L Merging Corp. In the merger, PC/UP&L Merging Corp. changed its name to PacifiCorp, an Oregon corporation. Pacific Power & Light Company, or PP&L, continues to be an assumed business name of PacifiCorp, and PP&L is an operating division of PacifiCorp. Thus, for the purposes of FEC reporting and disclosure, PacifiCorp and PP&L are, in essence, the same.

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Mr. Michael Marinelli
June 2, 1993
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Given the above explanation, the changes requested in our May 12 letter are not intended to achieve compliance with any legal requirements. Rather, they are being proposed because PacifiCorp is interested in seeking contributions to the Committee from operating divisions of PacifiCorp in addition to PP&L. Although this is permissible now, with PP&L as the connected organization, as a practical matter company officials believe it will be easier to seek such contributions from various divisions of the company if the changes described in our May 12 request letter are made. Because PP&L is an assumed business name of PacifiCorp, we believe these changes can be made simply by amending the Committee's Statement of Organization in the manner described in the attached letter. If the company is prohibited from making these changes by Statement of Organization amendment, please advise us of the Commission's reasons for reaching that conclusion.

I hope this letter responds to your recent inquiry. If you have any additional questions about our request, please let me know as soon as possible. I can be reached by telephone at (503) 294-9660.

Sincerely,



Robert D. Van Brocklin

Enclosure

cc: Board of Directors of Pacific Power & Light Company
Employee Political Action Committee
Mr. Mark Easley, Committee Treasurer
Mr. Thomas J. Imeson
Mr. Kevin Lynch
Ms. Gail King
Margaret D. Kirkpatrick, Esq.