

LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

November 20, 2014

Public Utility Commission of Oregon
550 Capitol Street NE, Suite 215
P.O. Box 2148
Salem, OR 97308-2148

RE: AR 583 – Rulemaking to Streamline eFiling and Other Housekeeping Changes
Idaho Power Company's Supplemental Comments

Attention Filing Center:

Idaho Power Company ("Idaho Power" or "Company") appreciates the opportunity to comment on the proposed revisions to the Public Utility Commission of Oregon's Administrative Rules relating to AR 583, eFiling and Other Housekeeping Changes. Idaho Power filed preliminary comments on October 29, 2014, in which the Company stated that it may file more comprehensive comments. After further evaluating the proposed revisions of Oregon's Administrative Rules, Idaho Power would like to further explain its concerns with two rules discussed in more detail below.

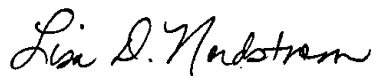
860-001-0170(f) and (g) – These sections address the acceptance of confidential and redacted materials. The proposed rule would require the redacted and confidential material to be received by the Filing Center the same date the material is electronically filed. This creates a logistical issue for filing parties. Because it is often difficult to avoid end of day filings, the rule as proposed would essentially shorten existing filing timeframes by two days. In other words, parties would need to send the original documents prior to the date the material is electronically filed to ensure the documents are received and accepted the same day. In some cases, confidentiality is not determined until the day of filing. To allow the integrity of the filing timeframes established in other rules to operate as envisioned, Idaho Power instead recommends the language proposed by NW Natural and Portland General Electric in their comments previously filed in this docket.

860-021-0015 – This rule addresses dispute resolution. Idaho Power believes the proposed revisions to this rule exceed the scope of eFiling and housekeeping changes and should be addressed in a separate proceeding. Section (3), as proposed, would authorize the Consumer Services Section to determine if a complainant is entitled to continued or restored service. Section (4) would allow the Consumer Services Section to determine when a complainant is not entitled to continued or restored service. These sections would designate a new level of adjudicatory responsibility to Consumer Staff and presumes that the Consumer Services Section would have the authority to determine when service should be restored or continued during the dispute process. Idaho Power believes this is a topic that should be discussed in more detail in a separate proceeding.

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With the exception of the above comments, Idaho Power supports the eFiling and other housekeeping changes as proposed. If you have any questions about these comments, please contact me at (208) 388-5825 or Zach Harris at (208) 388-2305.

Very truly yours,

A handwritten signature in black ink that reads "Lisa D. Nordstrom". The signature is written in a cursive, flowing style.

Lisa D. Nordstrom

LDN/kkt

cc: RA Files
Legal Files