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***VIA ELECTRONIC FILING***

June 8, 2023

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
P.O. Box 1088  
Salem, Oregon 97301

**Re: Docket UM 2209 – Comments on OPUC Staff’s Memo on Idaho Power’s 2023 Wildfire Mitigation Plan**

Dear Filing Center:

Idaho Power Company (“Idaho Power” or “Company”) is grateful for the opportunity to submit comments in the Public Utility Commission of Oregon’s (“OPUC” or “Commission”) Docket UM 2209. Idaho Power offers these comments on Commission Staff’s (“Staff”) memo, issued June 6, 2023, regarding the Company’s 2023 Wildfire Mitigation Plan (“WMP” or “Plan”).

The process of reviewing utility WMPs this cycle has been robust, and the Company thanks Staff for its engagement and commitment to the process. Additionally, Idaho Power is grateful to Staff for the role it played in issuing a revised Independent Evaluator (“IE”) report on the Company’s 2023 WMP. The revised document corrected misstatements and mischaracterizations by the IE, and Idaho Power appreciates having the updated report filed and released publicly as it presents a more accurate review of the 2023 WMP.

Regarding Staff’s memo, the Company concurs with Staff’s finding to recommend approval of Idaho Power’s 2023 WMP. In addition to recommending approval, Staff proposes 37 recommendations for the Company to integrate into future WMPs. Idaho Power does not comment here on these recommendations, as they each deserve ample consideration and, in many instances, will require substantial study, as well as collaboration with its peer utilities and Staff. The Company looks forward to continued collaboration with these groups, and others, in the ongoing evolution of a comprehensive and effective WMP. With respect to the Commission’s determination on items in Staff’s memo, Idaho Power respectfully requests that

the Commission treat the proposed recommendations as items for the Company to consider in collaboration with partners and parties as the plan matures and evolves over time.

While Idaho Power concurs with Staff's recommendation to approve the Company's 2023 WMP, the Company was disheartened by some of the concluding language in Staff's memo—language that was also used in the memos of its peer utilities—related to ongoing collaboration, process, and tone.

As an initial matter, Idaho Power does not and has never treated its WMP as a “check the box” exercise. The Company developed its first WMP proactively, and that effort preceded the Commission's rulemaking related to wildfire and WMP filings. Idaho Power continues to demonstrate great progress in evolving its Plan, and the Company is proud of the comprehensive work it has undertaken and completed with respect to wildfire mitigation efforts, PSPS development, customer and community education and engagement, industry collaboration and learning, and pilot programs. The Company's commitment to these efforts is reflected in the significant and ongoing work it has undertaken to further develop and improve its Plan, most recently demonstrated by the substantial changes made between 2022 and 2023; wildfire mitigation and protection is, unequivocally, one of the most important issues the Company continues to address at the enterprise level.

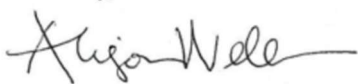
Additionally, the Company was fully engaged in Staff's review process. To use Staff's language, this was indeed a “substantial” undertaking—the Company participated in 17 hours of initial workshops and “deep dive” sessions with Staff, the IE, and its peer utilities, and responded to 136 discovery requests in the six-week period between the end of March and the first week of May. Idaho Power fully cooperated with these undertakings and devoted significant resources to ensure that Staff had the information needed for its review of the Company's WMP. Over the course of these efforts, Idaho Power did become concerned that the timing of the review process, abutting the start of the Company's wildfire season, which begins several weeks before other Oregon utilities, was inopportune considering the extent of work associated with the deep dive sessions and discovery. The weeks leading up to wildfire season are critical to ensuring the Company is prepared to effectively execute activities detailed in the WMP and PSPS plans, and pre-fire season preparation involves many of the same employees needed for Staff's “deep dive” sessions and completion of discovery requests. As a result of these concerns, Idaho Power, along with its peers, requested additional conversations with Staff about ways to optimize the review process in consideration of the upcoming wildfire season.

Based on the memo’s concluding language, it appears that these additional outreach efforts to Staff—the express purpose of which was to build efficiencies that would not compromise operational readiness—were taken as disruptive and not collaborative. Idaho Power’s outreach was an effort to enhance transparency and continue open communication with Staff, and the Company is dismayed to discover that these efforts were interpreted as hinderances. Idaho Power considered such outreach both vital to alert Staff to the very real operational challenges the Company was facing and, further, thought of the outreach as a *demonstration* of collaboration, not evidence to the contrary. Idaho Power hopes that, going forward, open and clear dialogue regarding process efficiencies and associated regulatory challenges is considered time well spent and not a source of disruption.

Finally, the Company would like to address Staff’s reference—again, present in all three utilities’ memos—that the “tone” of the WMPs is lacking with respect to customers living in elevated wildfire risk zones. The Company was surprised by this insinuation, as it takes great care to communicate with and educate local communities about the full breadth of its wildfire work and it is troubled by suggestions to the contrary. Given the cursory nature of this reference that is not echoed anywhere else in Staff’s memo or in the IE’s report, the Company is not clear of the basis for the statement and would appreciate further insight from Staff that informed such a position.

The Company recognizes that the Oregon WMP process is itself evolving. To that end, Idaho Power would simply like to reaffirm its commitment not just to effective wildfire mitigation but to healthy and productive relationships with Staff, its peers, customers, public safety partners, and the communities the Company serves. Idaho Power looks forward to ongoing growth and collaboration with Staff and parties as this process continues into the future.

Respectfully Submitted,



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Idaho Power

cc: OPUC Filing Center