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January 13, 2023

## **VIA ELECTRONIC FILING**

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

**RE: UM 2211 – Idaho Power HB 2475 Progress Update and Upcoming Third Workshop Regarding the Implementation of Other Possible Interim Actions**

Attention Filing Center:

Idaho Power Company (“Idaho Power” or “Company”) submits this letter to update the Public Utility Commission of Oregon (“Commission”), Commission Staff (“Staff”) and other stakeholders of the Company’s continued HB 2475-related progress and intended next-steps.

As discussed during Idaho Power’s second workshop hosted on September 28, 2022, and as part of other subsequent conversations with Staff, it is apparent that due to the Company’s service area economics and small customer base, the provision of targeted and meaningful relief (which balances all customers’ potential rate impacts) as part of an HB 2475-related offering might be best achieved using income or qualification thresholds different than those of other utilities’ interim HB 2475 programs. As such, the Company believes it prudent to have a Low Income Needs Assessment (“LINA”) performed for its Oregon service area and plans to rely upon such LINA’s findings to best inform, to the extent practicable, the level of assistance and eligibility criteria that should be considered as part of any future HB 2475 differential rate or bill discount proposal.<sup>1</sup>

Currently, the Company is in discussions with various LINA providers, such as those who performed similar assessments for Avista Utilities<sup>2</sup> and Cascade Natural Gas Corporation,<sup>3</sup> and expects to have its LINA completed mid-summer 2023. Following its completion, Idaho Power plans to submit its LINA’s results within Docket No. UM 2211 for Staff and stakeholders’ review.

In the near-term, the Company is planning to conduct its next workshop in February 2023. During this upcoming workshop, Idaho Power will discuss and solicit feedback regarding possible alternative programs or measures aimed at helping reduce participating customers’ energy burdens, but which could be implemented and offered ahead of any future, LINA-informed proposal.

<sup>1</sup> On November 18, 2022, within Docket No. UM 2261, Idaho Power filed an Application for Deferred Accounting of Exploratory and Implementation Costs Associated with Rate Mitigation Measures Authorized under House Bill 2475, the Energy Affordability Act.

<sup>2</sup> Docket No. UM 2211, Avista’s Oregon Energy Burden Assessment.

<sup>3</sup> Docket No. ADV 1409, Cascade Natural Gas Corporation Advice No. 22-06-01, Arrearage Management Program and Energy Discount Proposal.

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If you have any questions regarding this filing, or a request for specific metrics to be considered as part of the Company's LINA, please contact Regulatory Analyst Riley Maloney at [rmaloney@idahopower.com](mailto:rmaloney@idahopower.com).

Sincerely,



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