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January 2, 2024

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 and UE 426 – Idaho Power’s Proposed Bill Discount for Qualified Customers Program

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 proposal to implement Schedule 63 - Bill Discount for Qualified Customers Program (“Schedule 63” or “Bill Discount Program”) as part of its recently filed General Rate Case (“GRC”), UE 426.

The Company’s proposed Bill Discount Program seeks to consider the household income and respective energy burden of Idaho Power’s residential customers so that affordability of electric service may be enhanced for qualifying customers. Under the Company’s proposal, residential customers who demonstrate or self-declare that their gross household income, adjusted for household size, is at or below 60 percent of State Median Income (“SMI”), and whose estimated energy burden is calculated to be greater than 6 percent for electrically heated homes or 3 percent for non-electrically heated homes, will be provided a discount of up to 60 percent towards applicable charges. Additional information as to how the Company proposes to administer its Bill Discount Program, as well as the metrics proposed to be reported on, is contained within the Direct Testimony of Connie G. Aschenbrenner filed in UE 426.

In addition to seeking Commission approval of Schedule 63, the Company has also filed for approval in UE 426 of its proposed Schedule 64, Bill Discount for Qualified Customer’s Cost Recovery Mechanism (“Schedule 64”).

The table below includes the proposed recovery rates contained within Schedule 64:

Schedule	Monthly Adjustment Rate
Residential Rate Schedules (1 & 5)	\$0.95
Nonresidential Rate Schedules (7, 9, 15, 19, 24, 40, 41 and 42)	0.0813¢, up to the Billing Period's first 2,460,024 kWhs

Idaho Power is aware a number of organizations have expressed concern regarding the Company's inclusion of the matter in UE 426 and that there is a preference from those organizations the Bill Discount Program would be finalized in UM 2211 rather than UE 426. Idaho Power agrees in the importance of engaging impacted communities and applauds the Commission's efforts to ensure broad community involvement in UM 2211. The Company very much appreciates the participation and feedback of interested stakeholders in that case, which were instrumental in helping the Company design a Bill Discount Program that is responsive to the characteristics and needs of the communities it serves. Having collaborated extensively with interested parties in UM 2211 to develop a thoughtful and equitable program, Idaho Power believes the most appropriate place to finalize it is the Company's recently filed GRC, UE 426, so that it and its accompanying cost recovery mechanism may be holistically considered in conjunction with all other changes being proposed.

Like UM 2211, Idaho Power's GRC filings are subject to public review and Commission approval and Idaho Power welcomes participation from all members of the public and stakeholders alike in the process. Copies of the Company's filings are available on Idaho Power and the Commission's website and are available at Idaho Power's regional offices in the western part of its service area. These opportunities for public review are more fully described in the insert which will be sent by billing cycle to all customers starting with bills sent January 3, 2024. The Company has included a copy of this correspondence for ease of reference. Finally, interested persons can also request to receive case update notifications by email to the Commission at puc.hearings@puc.oregon.gov (reference UE 426).

To the extent stakeholders wish to offer additional input on the Company's Bill Discount Program, there continue to be opportunities to do so; interested parties may offer feedback in UE 426 regarding the Company's proposed Bill Discount Program, either independently or in conjunction with other changes proposed as part of its GRC. Comments may be submitted in one of the following ways:

- *By Web Form* - written comments can be offered through the Commission's web form available at <https://apps.puc.state.or.us/DocketPublicComment>;
- *By Email* - comments or questions can be emailed to puc.publiccomments@puc.oregon.gov;
- *By Telephone* - comments may be submitted to the Commission by calling 503-378-6600 or 800-522-2404;
- *By Mail* - comments can be mailed to Oregon Public Utility Commission, Attn: AHD- Case No. UE 426, Post Office Box 1088, Salem, OR 97301-3398.

More information on opportunities for participation can be found on the Commission's website.

Finally, the Company supported work in UM 2211 to enable Environmental Justice Communities access to intervenor funding in exchange for their participation in Idaho Power's cases. The Commission webpage <https://www.oregon.gov/puc/filing-center/Pages/Intervenor-Funding.aspx> provides an overview on how stakeholders can access Case Funding in exchange for their participation in an eligible Idaho Power case.

The collaborative efforts in UM 2211 provided the foundation for the Company's proposed Bill Discount Program that can now be considered holistically as part of its GRC to better facilitate the Company's aim of providing targeted and meaningful bill relief while simultaneously balancing all customers' potential rate impacts.

Sincerely,



Connie Aschenbrenner

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