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December 19, 2017

VIA ELECTRONIC FILING

Attention: Judge Sarah Rowe
Public Utility Commission of Oregon
P.O. Box 1088
Salem, Oregon 97308-1088

Re: Docket LC 68 - Stop B2H Coalition's Challenge of Protected Status

Dear Judge Rowe:

Idaho Power is writing to provide a brief explanation of the reasons it has marked as Protected Information the contents of Tab 2 of the Excel Spreadsheet marked as Attachment 19 to Idaho Power's Response to Commission Staff's DR 89. Idaho Power hopes that this written explanation will aid the parties' discussion at the telephone conference set for December 28, at 10:00 a.m.

Attachment 19 contains cost information regarding Idaho Power's planned B2H Transmission Line. Tab 2 contains Idaho Power's estimate of its projected monthly outlay for the project's construction, over a five-year period. This information represents a granular estimate of the Company's spending over the construction period and is highly sensitive for the following reasons:

First, the information contained in Tab 2 could represent material, non-public information subject to substantial federal regulation. As such, removal of the confidential designation could require the filing of an 8-K with the SEC. Moreover, because the forecast is an estimate, it is likely to be revised in the future; therefore, any future material changes could require the filing of additional 8-K's.

Second, Idaho Power will be issuing a request for proposals (RFP) for the construction of the project. Public disclosure of Idaho Power's monthly spend estimates could harm Idaho Power in the RFP process, as it would provide potential bidders with sensitive information that could unduly influence the development of their proposals.

Third, the forced removal of the confidential designation would set an unworkable precedent for material, non-public information within the context of regulatory filings. Idaho Power notes that it routinely files material, non-public financial information with the Commission as "Confidential" under the Commission's Standard Protective Order. Requiring Idaho Power to

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release such information publicly would undermine current protections, and unacceptably burden participation in the regulatory process.

We look forward to answering any questions you may have.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Lisa Rackner', with a large, stylized flourish at the end.

Lisa Rackner