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March 31, 2023

**VIA ELECTRONIC FILING**

Public Utility Commission of Oregon  
3930 Fairview Industrial Drive SE  
P.O. Box 1088  
Salem, Oregon 97308-1088

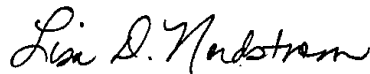
Re: Docket No. UM 2035  
Idaho Power Company's Transportation Electrification Plan

Attention Filing Center:

Attached for electronic filing in the above-referenced matter is Idaho Power Company's Petition for Temporary Waiver.

If you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,



Lisa D. Nordstrom

LDN/sg

Attachments

1 **BEFORE THE PUBLIC UTILITY COMMISSION**  
2 **OF OREGON**

3 **UM 2035**

4 In the Matter of  
5 Idaho Power Company,  
6 TRANSPORTATION ELECTRIFICATION PLAN  
7

**IDAHO POWER COMPANY'S  
PETITION FOR TEMPORARY  
WAIVER**

8  
9 Pursuant to Oregon Administrative Rule 860-087-0001(1), Idaho Power Company  
10 ("Idaho Power" or "Company") respectfully requests that the Public Utility Commission of  
11 Oregon ("OPUC" or "Commission") grant a one-time waiver of the Transportation  
12 Electrification ("TE") Plan Report for 2023.

13 **I. INTRODUCTION**

14 The Company asks that the Commission grant a one-time waiver, for 2023, of the  
15 requirement under OAR 860-087-0030 that the Company must file a TE Plan Report on or  
16 before May 1, 2023. After discussing the matter with OPUC Staff, the Company believes  
17 discussion and reporting of the Company's prior and current TE-related activity and results  
18 included in the 2023 - 2025 TE Plan filed on March 10, 2023, would render the separate TE  
19 Plan Report required by May 1, 2023, under Division 87 redundant for 2023. In future TE  
20 Plan filing years, the Company understands it must file a separate TE Plan Report on activity  
21 completed under the Company's prior three-year TE Plan.

22 **II. SUPPORT FOR REQUEST**

23 Idaho Power has worked with OPUC Staff and stakeholders over the last several  
24 months on its 2023 – 2025 TE Plan. On December 23, 2022, the Company filed its draft  
25 Plan and on January 23, 2023, the Company presented its Plan in a workshop hosted by  
26 OPUC Staff. The Company received informal comments from two stakeholders, and formal

1 comments from OPUC Staff. The Company responded to both informal and formal  
2 comments and worked with Staff to ensure its revised 2023 – 2025 plan, filed on March 10,  
3 2023, captured Staff's feedback, and fully complied with the Division 87 rules under OAR  
4 860-087-0020. The Company's revised Plan includes a discussion of prior and current TE  
5 activities, including how lessons learned from those activities will help inform the Company's  
6 approach to accelerating TE in the 2023 – 2025 planning period.

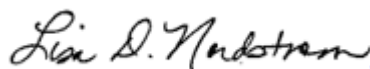
7 On April 4, 2023, the Company will file responses to two discovery requests from  
8 OPUC Staff. One of those responses will include historical TE expenditures from 2018 –  
9 2022. The Company believes that the discussion of prior and current activities and results  
10 in its revised 2023 - 2025 TE Plan, combined with the historical expenditures to be filed on  
11 April 4, 2023, would be sufficient to allow the Commission to satisfy its oversight  
12 responsibilities regarding the Company's 2022 TE activities.

13 Idaho Power remains fully committed to providing the comprehensive, portfolio-level  
14 TE planning and reporting content envisioned in the UM 2165 and AR 654 processes, to  
15 allow Staff and stakeholders and the Commission to evaluate and provide feedback and  
16 guidance on the Company's activities in support of TE. Idaho Power believes the  
17 Commission's approval of this waiver request would be consistent with the intent of the new  
18 Division 87 rules.

### 19 III. CONCLUSION

20 For the reasons stated above, should the Commission deem it appropriate, Idaho  
21 Power respectfully requests that the Commission waive the 2023 TE Plan Report  
22 requirement.

23 Respectfully submitted this 31st day of March 2023.

24 

25 \_\_\_\_\_  
26 Lisa D. Nordstrom  
Attorney for Idaho Power Company

1 **CERTIFICATE OF SERVICE**

2 **UM 2035**

3 I hereby certify that on March 31, 2023, I served a true and correct copy of Idaho  
4 Power Company's Petition for Temporary Waiver, by e-mail to said person(s) as indicated  
5 below.

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