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December 29, 2022

VIA ELECTRONIC FILING

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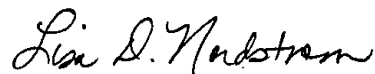
Re: Docket UM 2270
In the Matter of Idaho Power Company's Application for Deferred Accounting of
Costs Associated with Wildfire Mitigation Activities

Attention Filing Center:

Enclosed for electronic filing, pursuant to ORS 757.259 and OAR 860-027-0300, is Idaho Power Company's Application for Deferred Accounting of Costs Associated with Wildfire Mitigation Activities. The Application and Notice of Application for Deferred Accounting of Wildfire Mitigation Costs included as Attachment A have been served on the parties in UE 233, Idaho Power Company's last general rate case. Idaho Power has also contemporaneously filed its 2023 Wildfire Mitigation Plan in docket UM 2209.

If you have any questions, please do not hesitate to contact me or Regulatory Policy & Strategy Leader Alison Williams at (208) 388-2872.

Very truly yours,



Lisa D. Nordstrom

LDN:sg
Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM 2270

In the Matter of Idaho Power Company's
Application for Deferred Accounting of Costs
Associated with Wildfire Mitigation Activities

APPLICATION

I. INTRODUCTION

Pursuant to ORS 757.259 and OAR 860-027-0300, Idaho Power Company ("Idaho Power" or "Company") hereby requests the Public Utility Commission of Oregon ("Commission") authorize an accounting order for the Company to defer for later ratemaking treatment incremental costs related to wildfire mitigation activities. Having contemporaneously filed its 2023 Wildfire Mitigation Plan in UM 2209, Idaho Power seeks authorization for this deferral effective as of the date of this Application.

In support of this Application, Idaho Power states:

1. Idaho Power is a public utility in the state of Oregon and its rates, service and accounting practices are subject to regulation by the Commission.
2. This Application is filed pursuant to ORS 757.259, which allows the Commission, upon application, to authorize the deferral of certain items for later inclusion in rates.
3. Communications regarding this application should be addressed to:

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1 **II. OAR 860-027-0300(3) REQUIREMENTS**

2 **A. Description**

3 In Order Nos. 21-440 and 22-355, the Commission adopted rules related to utility risk-
4 based wildfire plans and wildfire mitigation activities. These orders built upon foundational
5 requirements established in Senate Bill (“SB”) 762 from 2021, which directed Oregon utilities
6 to file inaugural wildfire mitigation plans (“WMP”) with specified elements by December 31,
7 2021. The Commission established the AR 638 rulemaking docket both to promulgate and
8 build upon the requirements set forth in SB 762, resulting in adoption and amendment of
9 Oregon Administrative Rules (“OAR”) within Division 24 and Division 300.

10 Specifically, the Commission’s Order No. 21-440 adopted rules directly related to SB
11 762 requirements, including detailed elements for inclusion in a utility’s WMP. AR 638
12 continued through 2022, resulting in Order No. 22-355, which added additional utility
13 requirements related to safety, inspections, and vegetation management in High Fire Risk
14 Zones (“HFRZ”), as well as additional WMP requirements related to risk analysis,
15 communications, and Public Safety Power Shutoff (“PSPS”) events.

16 Idaho Power’s wildfire-mitigating operational practices and measures, as discussed in
17 this Application, have been informed by the Commission’s two wildfire-related orders, as well
18 as participation in industry and regulatory workshops and working groups, on-site visits,
19 conferences, and peer-sharing events with other Western utilities and with government
20 entities to learn current and potential best practices to reduce wildfire risk.

21 In recognition of Idaho Power’s new and incremental efforts to reduce wildfire risk, the
22 Company seeks authorization to defer, for future amortization, actual incremental costs
23 associated with its wildfire mitigation activities. Specifically, the Company is requesting the
24 Commission’s approval to defer the Oregon jurisdictional share of incremental operation and
25 maintenance (“O&M”) expenses until identified expenses can be included in base rates or
26 another acceptable collection method as envisioned by OAR 860-300-0003.

1 **B. Reasons for Deferral**

2 Idaho Power requests this deferral under ORS 757.259(2)(e). Authorizing the
3 Company's requested deferred accounting related to wildfire plans and mitigation activities
4 will minimize the frequency of rate changes and match appropriately the costs borne, and
5 benefits received by customers.

6 **C. Proposed Accounting**

7 Idaho Power proposes to record the deferral as a regulatory asset in FERC Account
8 182.3 (Other Regulatory Assets), crediting the appropriate FERC accounts as identified in the
9 Code of Federal Regulations for each circumstance. In the absence of a deferred accounting
10 order, the costs would remain in the operating expense accounts.

11 **D. Estimate of Amounts**

12 Idaho Power has identified new and incremental wildfire-related O&M expenditures in
13 the following categories: a) quantifying wildland fire risk, b) situational awareness, c) field
14 personnel practices, d) transmission and distribution ("T&D") mitigation programs, e)
15 enhanced vegetation management, f) communications, and g) information technology. These
16 areas are discussed in detail below.

17 The estimated total system costs for these categories are presented in Table 1 below,
18 along with jurisdictional allocation of costs to Oregon. In 2023, Idaho Power estimates
19 incremental wildfire O&M expenses in Oregon of \$714,000. Idaho Power has applied a
20 jurisdictional separation amount associated with total O&M, as reported in the Company's
21 annual FERC Form 1 filing. For 2021, the jurisdictional separation is 95.04 percent in Idaho
22 and 4.96 percent in Oregon. This separation amount applies to all incremental wildfire
23 mitigation O&M except for those activities only performed in one state, such as Red Risk Zone
24 ("RRZ") activities (the Company has no RRZs in Oregon). As the Company's wildfire mitigation
25 work evolves and if/when service area risk assessments change, Idaho Power will revisit
26

1 wildfire mitigation spending to determine if certain costs should be applied across the
 2 Company's service area.

3 **Table 1. Estimate of 2023 Incremental Wildfire O&M Expenses (\$000s)**

	2023	Oregon Jurisdictional Share
A. Quantifying Wildland Fire Risk		
Risk Map Updates	\$ 67	\$ 3
B. Situational Awareness		
Weather Forecasting - System development and support	\$ 47	\$ 2
Weather Forecasting Personnel - Fire Potential Index (FPI) and Public Safety Power Shutoff (PSPS)	\$ 178	\$ 9
Weather Forecasting - Weather Station Maintenance	\$ 19	\$ -
Pole Loading Modeling & Assessment (Contract service)	\$ 75	\$ -
Cameras	\$ 165	\$ -
C. Mitigation - Field Personnel Practices		
Tools/Equipment	\$ 5	\$ 0.25
Mobile Weather Kits for Field Observers	\$ 10	\$ 0.50
International Wildfire Risk Mitigation Consortium	\$ 40	\$ 2
D. Mitigation - Transmission & Distribution Programs		
O&M Component of Capital Work	\$ 61	\$ -
Annual O&M T&D Patrol Maintenance Repairs	\$ 50	\$ 2
Environmental Management Practices	\$ 25	\$ 25
Transmission Thermography Inspection Mitigation - Red Risk Zones	\$ 20	\$ -
Distribution Thermography Inspection Mitigation - Red Risk Zones	\$ 30	\$ -
Thermography Technician Personnel	\$ 160	\$ -
Transmission Wood Pole Fire Resistant Wraps - Red Risk Zone	\$ 88	\$ -
Transmission Wood Pole Fire Resistant Wraps - Yellow Risk Zone	\$ 163	\$ 8
Wildfire Mitigation Program Manager	\$ 191	\$ 9
Covered Wire Evaluation - Pilot Program in PSPS Zones	\$ 50	\$ 2
E. Vegetation Management		
Transition to/Maintain 3-year Vegetation Management Cycle	\$ 11,196	\$ 555
Enhanced Practices for Distribution Red & Yellow Risk Zones (Pre-Fire Season Patrols/Mitigation, Pole Clearing, Removals, Work QA)	\$ 1,284	\$ 64
Line Clearing Personnel	\$ 159	\$ 8
Fuel Reduction Program	\$ 75	\$ -
Vegetation Mgmt Satellite and Aerial patrols	\$ 150	\$ 7
F. Communications		
Wildfire/Wildfire Mitigation Education/Communication - Advertisements, Bill Inserts, Meetings, Other	\$ 100	\$ 5
PSPS Customer Education/Communication - Advertisements, Bill Inserts, Other	\$ 71	\$ 4
G. Information Technology		
Communication/Alert Tool for PSPS Customer Alerts/Extended Use	\$ 129	\$ 6
Forecast Incremental O&M Expenditures Total	\$ 14,608	\$ 714

1 **a. Quantifying Wildland Fire Risk**

2 While Idaho Power updates its Wildfire Plan on an annual basis, the underlying risk
3 analysis/map will be updated biennially. The Company projects spending \$67,000 on wildfire
4 risk analysis in 2023.

5 Prior to Idaho Power’s WMP, Idaho Power had not developed a risk map of its service
6 area. As such, the entire amount of the projected cost is incremental to the Company.
7 Because this analysis involves modeling risk across Idaho Power’s entire service area, the
8 Company will allocate the appropriate jurisdictional share to Oregon of \$3,000.

9 **b. Situational Awareness**

10 Idaho Power plans to spend \$484,000 on situational awareness efforts in 2023.
11 Similar to risk analysis, situational awareness expenses are new to Idaho Power as of the
12 development of its WMP. As such, the entire amount of the projected cost is incremental to
13 the Company.

14 The primary situational awareness expense is the cost of additional personnel required
15 to conduct weather forecasting for Idaho Power’s Fire Potential Index and PSPS events. While
16 Idaho Power does not anticipate calling any PSPS events in Oregon based on current risk
17 zone classifications, the Company could leverage PSPS if extreme conditions warranted such
18 a decision. Further, the Company conducts weather forecasting across its entire service area.
19 As such, costs for these efforts will be allocated to both Idaho and Oregon.

20 Three other situational awareness expenses—weather station maintenance, pole
21 loading assessments, and camera implementation—will be Idaho-based activities in 2023
22 and, therefore, costs will not be allocated to Oregon. Idaho Power does not own any weather
23 stations in Oregon, so there will be no additional maintenance expenditures there. Similarly,
24 the Company will only perform pole loading assessments and deploy cameras in targeted
25 areas of its Red Risk Zones (“RRZ”), and the Company has no RRZs in Oregon.

26

1 Considering the above, Idaho Power will only allocate \$11,000 of situational
2 awareness expense to Oregon.

3 **c. Field Personnel Practices**

4 A relatively small but critical expense is the equipment necessary to mitigate wildfire
5 risk by Idaho Power field personnel. The Company has identified a need for more widespread
6 supply of fire-specific mitigation tools (e.g., on-truck water pumping equipment, fire
7 extinguishers, shovels, and Pulaskis¹), which can be used in the field to reduce the likelihood
8 of an ignition event or quickly and immediately extinguish a sparked fire. Similarly, Idaho
9 Power has identified \$5,000 in incremental costs associated with new tools and equipment in
10 2023.

11 Following the 2021 fire season, the Company assessed that field personnel could also
12 benefit from mobile weather kits. Such remote-capable kits, which include a handheld wind
13 meter, compass, and radio with satellite communication, will allow field observers to gather
14 data on weather conditions in remote areas where phone and internet connectivity is limited.
15 The Company plans to deploy approximately 20 mobile weather kits to field observers.

16 Additionally, the Company is joining the International Wildfire Risk Mitigation
17 Consortium (“IWRMC”), an energy industry-led collaborative of utilities and energy developers
18 from around the globe. The group’s mission is to share lessons learned, best practices, and
19 innovation in the area of wildfire mitigation. Many of Idaho Power’s utility peers are part of the
20 consortium. The Company is not aware of any other effort or group that provides a similar
21 level of access or insight into global thinking and advancements in wildfire mitigation as the
22 IWRMC.

23

24

25 ¹ A Pulaski is a hand tool specifically used for fighting fires that combines an axe and an adze atop a
26 single handle. The tool is the invention of Edward Crockett Pulaski, a ranger with the U.S. Forest
Service who was based in Wallace, Idaho, in the early 1900s.

1 Idaho Power is outfitting field personnel with the above noted tools that will be used
2 across Idaho and Oregon. Similarly, lessons from the IWRMC will apply to Idaho and Oregon.
3 In total, the Company estimates spending \$55,000 on field personnel practices in 2023, with
4 approximately \$2,750 allocated to Oregon.

5 **d. T&D Mitigation Programs**

6 Identified incremental O&M expenses associated with Idaho Power's T&D programs
7 include a variety of items, most notably the cost of applying fire-proof or fire-resistant mesh
8 wraps to wood poles in RRZs and Yellow Risk Zones ("YRZ"). Additionally, Idaho Power is
9 performing expanded and more frequent T&D line inspections and adding a new technician
10 to assist in T&D program activities to perform wildfire mitigation efforts.

11 Idaho Power also performs specific environmental management practices as required
12 by Oregon. These same requirements do not exist in Idaho. As a result, the Company has
13 allocated 100 percent of these costs to Oregon, totaling \$25,000 in 2023.

14 In 2023, the Company also plans to test the use of covered wire and explore whether
15 it produces benefits, which can include reduced ignition probability. The pilot project will
16 involve developing construction standards, equipment specifications, and a methodology for
17 converting existing bare conductor in wildfire risk zones. The pilot will start with installations
18 in the Company's training yard to ensure that field personnel are properly trained to install and
19 maintain covered wire. From there, installations and testing will progress to the distribution
20 system and the pilot will conclude in 2024. If successful, covered wire will become a risk
21 mitigation measure used in certain wildfire risk zones and additional incremental costs may
22 result.

23 While the pilot will be performed in Idaho, the lessons learned from the effort will have
24 operational benefits that can be applied across the Company's service area. As a result, Idaho
25 Power plans to allocate pilot costs to Oregon, but not allocate costs associated with activities
26 only performed in RRZs, of which the Company has none in Oregon at this time. As a result,

1 the Company estimates \$838,000 in incremental T&D program spending in 2023, with only
 2 \$48,000 allocated to Oregon.

3 **e. Enhanced Vegetation Management**

4 Vegetation management is by far Idaho Power’s most significant wildfire-related
 5 expense. The Company is actively working to clear distribution lines on a three-year
 6 vegetation management cycle across its entire service area.² Moving to a consistent cycle
 7 requires Idaho Power to incur certain incremental costs beyond what it already spends
 8 annually on vegetation management. Idaho Power has, in recent years, experienced a
 9 growing set of challenges in its current vegetation management program, driven by additional
 10 vegetation growth, shortages of qualified labor, and increased resource costs. As a result of
 11 these challenges, the Company has observed a widening gap between the amount of
 12 vegetation management expenses it was authorized to recover in the last general rate case
 13 and the actual amount the Company spends each year. Table 2, below, shows that the 5
 14 percent gap between actual and authorized vegetation management costs in 2011 grew to 68
 15 percent in 2019 and has widened further since 2019.

16 **Table 2. Authorized v. Actual Vegetation Management Expenses (\$000s)**

	Authorized Amount*	Actual Expenses	Gap in Authorized & Actual Costs
2010		\$6,370	
2011	\$6,370	\$6,674	5%
2012	\$6,180	\$6,946	12%
2013	\$6,414	\$7,332	14%
2014	\$6,183	\$7,788	26%
2015	\$6,259	\$8,084	29%
2016	\$6,229	\$7,719	24%
2017	\$6,393	\$8,048	26%
2018	\$6,400	\$11,095	73%
2019	\$6,378	\$10,741	68%

25 _____
 26 ² Idaho Power will continue to clear transmission right-of-way corridors located in mountainous areas on a six-year cycle.

1 It is critical to understand that Idaho Power has not been achieving more line miles of
2 vegetation management with this increased spending. On the contrary: each year, a dollar
3 spent on vegetation management continues to purchase fewer line miles cleared due to the
4 numerous challenges discussed below.

5 A variety of factors help explain the cost increases Idaho Power has experienced in
6 vegetation management. Most notably, the availability of qualified labor has diminished while
7 demand for vegetation management services has grown across the Western United States.
8 Importantly, the vegetation management companies hired by Idaho Power and other utilities
9 are not simple arborists or landscapers. Vegetation management companies qualified to work
10 near electrical lines and equipment require special certifications and training. The limited
11 number of companies offering such qualified services are in high demand in many Western
12 states, and especially in California, where labor rates are higher for the work itself and the
13 labor that provides it. Idaho Power has felt the effect of out-of-state competition in the form of
14 double-digit cost increases and qualified labor shortages.

15 Climate change is another factor contributing to escalating vegetation management
16 costs. In recent years, Idaho Power's service area has experienced wetter springs followed
17 by more temperate summers and falls, leading to longer vegetation growing seasons. This
18 fact alone, even without the qualified labor shortages, has increased the amounts of money
19 Idaho Power has spent to trim and prune the same service area. Another climate-related issue
20 is the spread of pests such as the bark beetle that leave dead trees in their wake. Failure to
21 remove dead or dying vegetation—a problem felt most acutely on government land—
22 complicates vegetation management work and makes adhering to a routine clearing cycle
23 more challenging, time consuming, and, thereby, more costly.

24 The costs associated with vegetation management are Idaho Power's largest
25 incremental wildfire mitigation expense. In 2023, the Company forecasts spending \$12.9
26 million on incremental vegetation management expenses, with most of that amount stemming

1 from efforts to work toward maintaining a three-year pruning cycle. Recognizing that
2 heightened risk exists in the RRZs and YRZs, Idaho Power is taking greater precautions and
3 measures in these areas with respect to vegetation management, including additional
4 inspections, patrols, and maintenance pre-fire season. These enhanced efforts are consistent
5 with new and amended rules under OAR 860-024-0016 and -0018 related to vegetation
6 management and mitigation activities in HFRZs.

7 Because Idaho Power’s enhanced vegetation management work was initiated through
8 contracts in late 2020, the Company plans to continue to absorb the costs of a base level of
9 vegetation management—approximately \$10.7 million in 2019 and escalated annually for
10 inflation.³ The Company considers the gap between the authorized amount from Idaho
11 Power’s most recent general rate case (approximately \$6.4 million) and the actual amount
12 incurred in 2019 to be reflective of “regulatory lag.” In summary, Idaho Power is requesting
13 authority to defer the Oregon jurisdictional share of incremental vegetation management costs
14 above a base level of 2019 actual costs, with that base escalated annually for inflation. The
15 top three lines of the vegetation management section in Table 1, totaling \$12.6 million, reflect
16 the Company’s estimated 2023 incremental costs above the 2019 baseline; \$627,000 of this
17 amount would be allocated to Oregon.

18 Idaho is also taking part in two additional activities related to vegetation management:
19 an Idaho-based fuel reduction program with a number of state and federal entities (no costs
20 will be allocated to Oregon) and a satellite and aerial patrol pilot to assess vegetation in the
21 Company’s wildfire risk zones. The technology used in these satellite and aerial patrols will
22 help identify encroachment and clearance issues in areas that are growing faster than
23 expected and hazard trees that have the potential of falling into powerlines. Data collected
24 through this technology may reshape the Company’s vegetation management strategy and

25 _____
26 ³ Annual inflation is based on the Consumer Price Index (“CPI”) 10-year average for 2019 of 1.81 percent.

1 shift from a systemwide cycle to a more targeted approach that identifies and focuses on high-
2 growth vegetation areas. The Company will conduct limited vegetation-focused satellite and
3 aerial patrols in 2023 before expanding to a larger area in 2024 and 2025, pending outcomes
4 from the pilot. The Company estimates spending \$150,000 on this technology in 2023, with
5 \$7,000 allocated to Oregon.

6 **f. Communications**

7 In 2023, the Company projects \$171,000 in new communications expenses related to
8 customer and community educational outreach on both wildfire and PSPS via advertisements,
9 printed media, social media, and meetings. The purpose of these new communications will
10 be to keep customers aware of mitigation and fire-related activities before, during, and after
11 fire season.

12 With the addition of PSPS as a potential tool the Company may use, Idaho Power has
13 identified a need for new customer communication, education, and awareness specific to this
14 topic. Idaho Power's customers and communities are largely unfamiliar with the concept of
15 PSPS events and why the Company may need to take such actions. Dedicated
16 communications on this topic are necessary to ensure that all customers—whether they reside
17 in PSPS potential zones or not—are aware and educated about PSPS, how the Company will
18 make such decisions, and how customers will be alerted and impacted in such events.

19 Given that communication related to wildfire and PSPS is occurring across Idaho
20 Power's service area, the Company will allocate \$9,000 in communication costs to Oregon in
21 2023.

22 **g. Information Technology**

23 During the AR 638 rulemaking, the Company identified a gap when evaluating the
24 ability to reach customers quickly for wildfire or PSPS events. The Company's prior text alert
25 system had both a character count limit and batch limit that prevent detailed communications
26 to a large number of customers and/or sending a series of communications over a short period

1 of time. The Company has also learned from its peers in other states that one of the most vital
2 aspects of PSPS is the ability to maintain contact with customers. Customers need alerts in
3 advance of, during, and following such events, and they rely on accurate and timely
4 information to help them navigate these events. Notably, these are also PSPS communication
5 requirements under OAR 860-300-0050 and -0060.

6 To close this gap in the Company's customer notification abilities, Idaho Power
7 researched available tools designed for rapid alerts and notifications. The Company also
8 conferred with peer utilities to learn about the systems they use for PSPS. This research
9 resulted in selection of the EONS communication tool, which is an automated system that
10 allows for the rapid, frequent communications Idaho Power will need to deploy in PSPS
11 events. In conjunction with implementing EONS, the Company developed coordinating
12 information that customers can access online—specifically, an outage map that is searchable
13 by address and will show the latest status on PSPS events and locations.

14 Idaho Power estimates spending \$129,000 on the EONS tool in 2023, and because
15 the value of this tool will apply equally across the Company's service area, \$6,000 of the
16 expense will be allocated to Oregon.

17 **E. Notice**

18 A copy of the Notice of Application for Deferred Accounting of Costs Associated with
19 Wildfire Mitigation Activities and a list of persons served with the Notice are attached to the
20 Application as Attachment A.

21 **III. CONCLUSION**

22 As explained above, Idaho Power is taking significant and proactive measures to
23 mitigate the increasing risk of wildfire. Taking actions to reduce the risk of wildfires is critical
24 for Idaho Power's customers, the communities in which the Company operates, and investors
25 who provide capital to the Company. These measures are all in compliance with and
26


1 complementary of the Commission's wildfire rules established in Order Nos. Order Nos. 21-
2 440 and 22-355.

3 To this end, Idaho Power respectfully requests that, consistent with ORS 757.259 and
4 OAR 860-027-0300, the Commission authorize the Company to defer incremental costs
5 associated with its wildfire mitigation activities beginning the date of this Application until
6 identified expenses can be included in base rates or another acceptable collection method as
7 envisioned by OAR 860-300-0003.

8 Respectfully submitted this 29th day of December 2022.

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IDAHO POWER COMPANY



LISA D. NORDSTROM
Attorney for Idaho Power Company
OSB # 973528

1 **CERTIFICATE OF SERVICE**

2 **UM 2270**

3 I hereby certify that on December 29, 2022, I served a true and correct copy of Idaho
4 Power Company's Application for Deferred Accounting of Costs Associated with Wildfire
5 Mitigation Activities on the parties in Docket UE 233 by e-mail to said person(s) as indicated
6 below.

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DATED: December 29, 2022



Stacy Gust, Regulatory Administrative Assistant

Attachment A

BEFORE THE PUBLIC UTILITY COMMISSION

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OF OREGON

UM 2270

In the Matter of Idaho Power Company's
Application for Deferred Accounting of Costs
Associated with Wildfire Mitigation Activities.

**NOTICE OF APPLICATION FOR
DEFERRED ACCOUNTING OF
WILDFIRE MITIGATION COSTS**

On December 29, 2022, Idaho Power Company ("Idaho Power") filed an application with the Public Utility Commission of Oregon ("Commission") for an Order authorizing the deferral of incremental costs related to the Company's wildfire mitigation activities. Approval of Idaho Power's Application will not authorize a change in Idaho Power's rates but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

Idaho Power's Application will be posted on the Commission website for persons who wish to obtain a copy or they may contact the following:

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lnordstrom@idahopower.com

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1 Any person who wishes to submit written comments to the Commission on Idaho
2 Power's Application must do so by no later than January 26, 2023.

3 DATED: December 29, 2022

IDAHO POWER COMPANY

Lisa D. Nordstrom

LISA D. NORDSTROM
Attorney for Idaho Power Company

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