



LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

March 24, 2020

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
Salem, Oregon 97301

Re: Docket No. UM _____
In the Matter of Idaho Power Company's Application for an Order
Approving Deferred Accounting of Costs Associated with Response to
COVID-19 Public Health Emergency

Attention Filing Center:

Enclosed for filing is an electronic copy of Idaho Power Company's Application for an Order Approving Deferred Accounting of Costs Associated with Response to COVID-19 Public Health Emergency.

The Notice of Application for Authorization of Deferred Accounting is attached to the Application as Attachment A. The Application and Notice have been served on the parties in Docket No. UE 233, Idaho Power Company's last general rate case.

If you have any questions, please do not hesitate to contact me or Senior Regulatory Analyst Courtney Waites at (208) 388-5612.

Very truly yours,

A handwritten signature in black ink that reads "Lisa D. Nordstrom".

Lisa D. Nordstrom
OSB No. 97352

LDN/kkt

Enclosures

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UM _____

In the Matter of Idaho Power Company's
Application for an Order Approving Deferred
Accounting of Costs Associated with
Response to COVID-19 Public Health
Emergency.

APPLICATION

I. INTRODUCTION

Under ORS 757.259 and OAR 860-027-0300, Idaho Power Company ("Idaho Power" or "Company") requests an order authorizing it to defer for later ratemaking treatment costs from the COVID-19 public health emergency. Idaho Power seeks authorization to defer the costs incurred from the date of this application. Idaho Power will seek amortization of the deferred costs in a future Commission proceeding.

In support of this Application, Idaho Power states:

1. Idaho Power is a public utility in the state of Oregon and its rates, services, and accounting practices are subject to the regulation of the Public Utility Commission of Oregon ("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:

Lisa Nordstrom
Idaho Power Company
P.O. Box 70
Boise, ID 83707
lnordstrom@idahopower.com

Regulatory Dockets
Idaho Power Company
P.O. Box 70
Boise, ID 83707
dockets@idahopower.com

1 Informal questions may be directed to Courtney Waites, Senior Regulatory Analyst, at
2 (208) 388-5612.

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

4 **A. Description**

5 Idaho Power seeks authorization from the Public Utility Commission of Oregon
6 (“Commission”) to defer, for future amortization, costs incurred to respond to the 2019 novel
7 coronavirus disease outbreak designated by the World Health Organization as COVID-19
8 (‘CO’ stands for ‘corona,’ ‘VI’ for ‘virus,’ and ‘D’ for disease). On March 8, 2020, Oregon
9 Governor Kate Brown declared a state of emergency over the COVID-19 outbreak. Idaho
10 Power expects that it will incur significant costs in its response to the public health
11 emergency, including bad debt expense resulting from higher than average levels of write-
12 offs of uncollectible accounts associated with the suspension of disconnects and late
13 payment fees to assist customers facing unprecedented economic pressures. Idaho Power
14 also expects to incur additional costs that cannot currently be predicted given the
15 unprecedented nature of this public health emergency. Accordingly, Idaho Power requests
16 authorization to establish a new deferral account to record the costs associated with its
17 COVID-19 response.

18 **B. Reasons for Deferral**

19 Idaho Power requests this deferral under ORS 757.259(2)(e). This deferral will match
20 appropriately the costs borne by and benefits received by customers. Idaho Power is also
21 seeking authorization for the deferral because of the potential magnitude and
22 unprecedented nature of the COVID-19 public health emergency. The associated risks of
23 the COVID-19 public health emergency are well outside reasonable business risk for the
24 Company.

25 This deferral will minimize the frequency of rate changes or the fluctuation of rate levels
26 or match appropriately the costs borne by and benefits received by customers.

Attachment A

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UM _____

In the Matter of Idaho Power Company's
Application for an Order Approving Deferred
Accounting of Costs Associated with
Response to COVID-19 Public Health
Emergency.

**NOTICE OF APPLICATION FOR
AUTHORIZATION OF DEFERRED
ACCOUNTING**

On March 24, 2020, Idaho Power Company ("Idaho Power") filed an Application with the Public Utility Commission of Oregon ("Commission") for an order authorizing deferral of the costs associated with its response to the COVID-19 public health emergency incurred from the date of this Application.

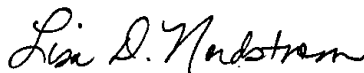
Approval of Idaho Power's Application will not authorize a change in Idaho Power's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

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:

Lisa D. Nordstrom
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
lnordstrom@idahopower.com

Any person may submit written comments to the Commission regarding Idaho Power's Application within 25 days of the date of this filing

DATED: March 24, 2020.



Lisa D. Nordstrom
Attorney for Idaho Power Company

1 **CERTIFICATE OF SERVICE**

2 **UM _____**

3 I hereby certify that on March 24, 2020, I served a true and correct copy of Idaho
4 Power Company's Application for Deferred Accounting of Costs Associated with
5 Response to COVID-19 Public Health Emergency on the parties in Docket No. UE 233,
6 Idaho Power Company's last general rate case, by e-mail to said person(s) as indicated
7 below.

8 OPUC Dockets
Citizens' Utility Board of Oregon
9 dockets@oregoncub.org

Robert Jenks
Citizens' Utility Board of Oregon
bob@oregoncub.org

10 Lisa F. Rackner
McDowell Rackner & Gibson PC
11 dockets@mrg-law.com

Stephanie S. Andrus
Department of Justice
Business Activities Section
stephanie.andrus@state.or.us

12 Mitch Moore
Public Utility Commission of Oregon
13 mitch.moore@state.or.us

Somer Moser
Department of Justice
somer.moser@doj.state.or.us

14 Erik Colville
Public Utility Commission of Oregon
15 erik.colville@state.or.us

Gregory M. Adams
Richardson Adams, PLLC
greg@richardsonadams.com

16 Peter J. Richardson
Richardson Adams, PLLC
17 peter@richardsonadams.com

Joshua D. Johnson
Attorney at Law
jdj@racinelaw.net

18 Dr. Don Reading
19 dreading@mindspring.com

Anthony J. Yankel
Utility Net, Inc.
tony@yankel.net

20 Randy Dahlgren
Portland General Electric Company
21 pge.opuc.filings@pgn.com

Douglas C. Tingey
Portland General Electric Company
doug.tingey@pgn.com

22 Irion A. Sanger
Davison Van Cleve, PC
23 irion@sanger-law.com

Wendy Gerlitz
NW Energy Coalition
wendy@nwenergy.org

24 Etta Lockey
Pacific Power
25 etta.lockey@pacificcorp.com

Sarah Link
Pacific Power
sarah.link@pacificcorp.com

1 Oregon Dockets
2 PacifiCorp, d/b/a Pacific Power
oregondockets@pacificorp.com

Donald W. Schoenbeck
Regulatory & Cogeneration Services, Inc.
dws@r-c-s-inc.com

3 John W. Stephens
4 Esler Stephens & Buckley
stephens@eslerstephens.com
ortez@eslerstephens.com

Renewable Northwest Project
dockets@renewablenw.org

5 DATED: March 24, 2020

6
7 
8 Kimberly Towell, Executive Assistant

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26