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December 29, 2023

**VIA ELECTRONIC FILING**

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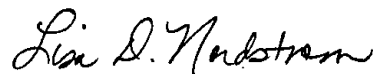
Re: Docket UM 2270(1)  
In the Matter of Idaho Power Company's Application for Deferred Accounting of  
Costs Associated with Wildfire Mitigation Activities

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 2024 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(1)

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

APPLICATION FOR  
REAUTHORIZATION

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") reauthorize an accounting order for the Company to defer for later ratemaking treatment incremental costs related to wildfire mitigation activities. Having contemporaneously filed its 2024 Wildfire Mitigation Plan in UM 2209, Idaho Power seeks reauthorization for this deferral effective as of January 1, 2024.

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

**A. Description**

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

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

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

In recognition of Idaho Power’s new and incremental efforts to address potential wildfire risk, the Company seeks reauthorization to defer, for future amortization, actual incremental costs associated with its wildfire mitigation activities. Specifically, the Company is requesting the Commission’s approval to defer the Oregon jurisdictional share of incremental operation and maintenance (“O&M”) expenses until identified expenses can be included in base rates.

1 With this application, the Company seeks to defer new and incremental wildfire  
2 expenses incurred beginning January 1, 2024.

3 **B. Reasons for Deferral**

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

8 **C. Proposed Accounting**

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

13 **D. Estimate of Amounts**

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

19 The estimated total system costs for these categories are presented in Table 1 below,  
20 along with jurisdictional allocation of costs to Oregon. In 2024, Idaho Power estimates  
21 incremental wildfire O&M expenses in Oregon of \$1,287,000. Idaho Power has applied a  
22 jurisdictional separation amount associated with total O&M, as reported in the Company's  
23 annual FERC Form 1 filing. For 2022, the jurisdictional separation is 95.2 percent in Idaho  
24 and 4.8 percent in Oregon. This separation applies to all incremental wildfire mitigation O&M  
25 except for those activities only performed in one state, which, in this deferral application, is  
26 limited to environmental management practices that are only performed in Oregon.

1 **Table 1. Estimate of 2024 Incremental Wildfire O&M Expenses (\$000s)**

	2024 Forecast	Oregon Share
<b>A. Quantifying Wildland Fire Risk</b>		
Risk Map Updates and Dynamic Risk Modeling	\$ 10	\$ 0.48
<b>B. Situational Awareness</b>		
Weather Forecasting - System development and support	\$ 74	\$ 3.55
Weather Forecasting Personnel - Fire Potential Index (FPI) and Public Safety Power Shutoff (PSPS)	\$ 103	\$ 4.94
Weather Forecasting - Weather Station Maintenance	\$ 23	\$ 1.10
Pole Loading Modeling & Assessment (Contract service)	\$ 75	\$ 3.60
Cameras	\$ 200	\$ 9.60
<b>C. Mitigation - Field Personnel Practices</b>		
Tools/Equipment	\$ 5	\$ 0.24
Mobile Weather Kits for Field Observers	\$ 2	\$ 0.10
International Wildfire Risk Mitigation Consortium	\$ 35	\$ 1.68
<b>D. Mitigation - Transmission &amp; Distribution Programs</b>		
O&M Component of Capital Work	\$ 111	\$ 5.33
Annual O&M T&D Patrol Maintenance Repairs	\$ 50	\$ 2.40
Annual Recloser Segmentation Maintenance and Communication	\$ 5	\$ 0.24
Environmental Management Practices	\$ 25	\$ 25.00
Transmission Thermography Inspection Mitigation	\$ 200	\$ 9.60
Distribution Thermography Inspection Mitigation	\$ 30	\$ 1.44
Thermography Technician Personnel	\$ 216	\$ 10.37
Transmission Wood Pole Fire Resistant Wraps	\$ 250	\$ 12.00
Wildfire Mitigation Program Labor	\$ 516	\$ 24.77
Covered Wire Evaluation - Pilot Program in PSPS Zones	\$ 50	\$ 2.40
<b>E. Vegetation Management</b>		
Transition to/Maintain 3-year Vegetation Management Cycle	\$ 22,344	\$ 1,073
Enhanced Practices for Distribution Red & Yellow Risk Zones (Pre-Fire Season Patrols/Mitigation, Pole Clearing, Removals, Work QA)	\$ 1,348	\$ 65
Line Clearing Personnel	\$ 168	\$ 8
Vegetation Mgmt Satellite and Aerial patrols	\$ 150	\$ 7
<b>F. Communications</b>		
Wildfire/Wildfire Mitigation Education/Communication - Advertisements, Bill Inserts, Meetings, Other & PSPS Customer Education/Communication - Advertisements, Bill Inserts, Other	\$ 171	\$ 8.21
<b>G. Information Technology</b>		
Communication/Alert Tool for PSPS Customer Alerts/Extended Use	\$ 161	\$ 7.73
<b>Total</b>	<b>\$ 26,322</b>	<b>\$ 1,287</b>

1           **a.       Quantifying Wildland Fire Risk**

2           While Idaho Power updates its WMP on an annual basis, the underlying risk  
3 analysis/map is updated biennially. The Company projects spending \$10,000 on wildfire risk  
4 analysis and wildfire risk map updates in 2024.

5           Because this analysis involves modeling risk across Idaho Power’s entire service area,  
6 the Company will allocate the appropriate jurisdictional share to Oregon of \$480.

7           **b.       Situational Awareness**

8           Idaho Power plans to spend \$475,000 on situational awareness efforts in 2024.  
9 Similar to risk analysis, situational awareness expenses are new to Idaho Power as of the  
10 development of its WMP. As such, the entire amount of the projected cost is incremental to  
11 the Company.

12          The primary situational awareness expenses are the cost of additional personnel  
13 required to conduct weather forecasting for Idaho Power’s Fire Potential Index and PSPS  
14 events, as well as the use of cameras. The Company conducts weather forecasting across its  
15 entire service area and intends to use data from cameras to inform operations across its  
16 service area. As such, costs for these efforts will be allocated to both Idaho and Oregon.

17          Similarly, the other situational awareness expenses—weather station maintenance  
18 and pole loading assessments—will support enhanced situational awareness activities across  
19 the Company’s service area.

20          Considering the above, Idaho Power will allocate \$22,800 of situational awareness  
21 expense to Oregon.

22           **c.       Field Personnel Practices**

23          A relatively small but vital expense is the equipment necessary to mitigate wildfire risk  
24 by Idaho Power field personnel. The Company has identified a need for more widespread  
25 supply of fire-specific mitigation tools (e.g., on-truck water pumping equipment, fire  
26

1 extinguishers, shovels, and Pulaskis<sup>1</sup>), which can be used in the field to reduce the likelihood  
2 of an ignition event or quickly and immediately extinguish a sparked fire. Similarly, Idaho  
3 Power has identified \$5,000 in incremental costs associated with new tools and equipment in  
4 2024.

5 The Company has assessed that field personnel also benefit from mobile weather kits.  
6 Such remote-capable kits, which include a handheld wind meter, compass, and radio with  
7 satellite communication, allow field observers to gather data on weather conditions in remote  
8 areas where phone and internet connectivity is limited. The Company plans to deploy  
9 additional mobile weather kits to field observers.

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

17 Idaho Power is outfitting field personnel with the above noted tools that will be used  
18 across Idaho and Oregon. Similarly, lessons from the IWRMC will apply to Idaho and Oregon.  
19 In total, the Company estimates spending \$42,000 on field personnel practices in 2024, with  
20 approximately \$2,020 allocated to Oregon.

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

22 Identified incremental O&M expenses associated with Idaho Power’s T&D programs  
23 include a variety of items, most notably the cost of applying fire-proof or fire-resistant mesh  
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25 <sup>1</sup> 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 wraps to wood poles in wildfire risk zones. Additionally, Idaho Power is performing expanded  
2 and more frequent T&D line inspections and adding a new technician to assist in T&D program  
3 activities to perform wildfire mitigation efforts.

4 Idaho Power also performs specific environmental management practices as required  
5 by Oregon. These same requirements do not exist in Idaho. As a result, the Company has  
6 allocated 100 percent of these costs to Oregon, totaling \$25,000 in 2024.

7 In 2024, the Company will continue to test the use of covered wire and explore whether  
8 it produces benefits, which can include reduced ignition probability. The pilot project will  
9 involve developing construction standards, equipment specifications, and a methodology for  
10 converting existing bare conductor in wildfire risk zones. The pilot, which will conclude at the  
11 end of 2024, involves an installation in the Company's training yard to ensure that field  
12 personnel are properly trained to install and maintain covered wire. If successful, covered wire  
13 will become a risk mitigation measure used in certain wildfire risk zones and additional  
14 incremental costs may result.

15 While the pilot will be performed in Idaho, the lessons learned from the effort will have  
16 operational benefits that can be applied across the Company's service area. As a result, Idaho  
17 Power plans to allocate pilot costs to Oregon.

18 In total, the Company estimates spending \$1,453,000 in incremental T&D program  
19 spending in 2024, with \$93,540 allocated to Oregon.

20 **e. Enhanced Vegetation Management**

21 Vegetation management is by far Idaho Power's most significant wildfire-related  
22 expense. The Company is actively working to clear distribution lines on a three-year  
23 vegetation management cycle across its entire service area.<sup>2</sup> A three-year cycle requires  
24 Idaho Power to incur certain incremental costs beyond what it already spends annually on

25 \_\_\_\_\_  
26 <sup>2</sup> Idaho Power will continue to clear transmission right-of-way corridors located in mountainous areas  
on a six-year cycle.



1 vegetation management. Idaho Power has, in recent years, experienced a growing set of  
2 challenges in its current vegetation management program, driven by additional vegetation  
3 growth, shortages of qualified labor, and increased resource costs. As a result of these  
4 challenges, the Company has observed a widening gap between the amount of vegetation  
5 management expenses it was authorized to recover in the last general rate case and the  
6 actual amount the Company spends each year.

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

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

26

1 The costs associated with vegetation management are Idaho Power's largest  
2 incremental wildfire mitigation expense. In 2024, the Company forecasts spending \$24 million  
3 on incremental vegetation management expenses, with most of that amount stemming from  
4 efforts to work toward maintaining a three-year pruning cycle. Idaho Power is taking greater  
5 precautions and enhanced measures in wildfire risk zones with respect to vegetation  
6 management, including additional inspections and patrols. These enhanced efforts are  
7 consistent with new and amended rules under OAR 860-024-0016 and -0018 related to  
8 vegetation management and mitigation activities in HFRZs.

9 Because Idaho Power's enhanced vegetation management work was initiated through  
10 contracts in late 2020, the Company plans to continue to absorb the costs of a base level of  
11 vegetation management—approximately \$10.7 million in 2019 and escalated annually for  
12 inflation.<sup>3</sup> The Company considers the gap between the authorized amount from Idaho  
13 Power's last general rate case and the actual amount incurred in 2019 to be reflective of  
14 "regulatory lag." In summary, Idaho Power is requesting authority to defer the Oregon  
15 jurisdictional share of incremental vegetation management costs above a base level of 2019  
16 actual costs, with that base escalated annually for inflation. The top two lines of the vegetation  
17 management section in Table 1, totaling \$23.7 million, reflect the Company's estimated 2024  
18 incremental costs above the 2024 baseline; \$1.14 million of this amount will be allocated to  
19 Oregon.

20 Idaho Power is also conducting a satellite and aerial patrol pilot to assess vegetation  
21 in the Company's wildfire risk zones. The technology used in these satellite and aerial patrols  
22 will 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  
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25 <sup>3</sup> Annual inflation is based on the Consumer Price Index ("CPI") 10-year average for 2019 of 1.81  
26 percent. At this rate, the 2024 baseline used to determine the incremental vegetation management  
amount in this application is \$11.75 million.

1 through this technology may reshape the Company's vegetation management strategy and  
2 shift from a systemwide cycle to a more targeted approach that identifies and focuses on high-  
3 growth vegetation areas. The Company conducted limited vegetation-focused satellite and  
4 aerial patrols and data analysis in 2023 and will expand to other areas in 2024 and 2025. The  
5 Company estimates spending \$150,000 on this technology in 2024, with \$7,000 allocated to  
6 Oregon.

7 **f. Communications**

8 In 2024, the Company projects \$171,000 in new communications expenses related to  
9 customer and community educational outreach on both wildfire and PSPS via advertisements,  
10 printed media, social media, and meetings. The purpose of these new communications will  
11 be to keep customers aware of mitigation and fire-related activities before, during, and after  
12 fire season.

13 With the addition of PSPS as a potential tool the Company may use as a mitigation  
14 strategy, Idaho Power has identified a need for ongoing customer communication, education,  
15 and awareness specific to this topic. Dedicated communications on this topic are necessary  
16 to ensure that all customers—whether they reside in PSPS potential areas or not—are aware  
17 and educated about PSPS, how the Company will make such decisions, and how customers  
18 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 \$8,210 in communication costs to Oregon in  
21 2024.

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 \$161,000 on the EONS tool in 2024, and because  
15 the value of this tool will apply equally across the Company's service area, \$7,730 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. OAR 860-027-0300(4) REQUIREMENTS**

22 **A. Entries in the Deferred Account to Date**

23 As of the date of this Application, Idaho Power has not received authorization from  
24 the Commission to defer amounts associated with its initial deferral application from  
25 December 29, 2022. As a result, wildfire mitigation-related expenses for deferral in 2023  
26 have not yet been included in a regulatory asset account.

1     **B. Reason for Continuation of Deferred Accounting**

2             As discussed in detail above, this deferral is intended to capture the incremental  
3 costs related to wildfire mitigation activities required by SB 762, and Order Nos. 21-440 and  
4 22-355 related to the adoption and amendment of OAR Divisions 24 and 300, for later  
5 ratemaking treatment.

6                                                             **IV. CONCLUSION**

7             As explained above, Idaho Power is taking significant and proactive measures to  
8 mitigate the increasing risk of wildfire. Taking actions to reduce the risk of wildfires is critical  
9 for Idaho Power’s customers, the communities in which the Company operates, and investors  
10 who provide capital to the Company. These measures are all in compliance with and  
11 complementary of the Commission’s wildfire rules established in Order Nos. Order Nos. 21-  
12 440 and 22-355.

13            To this end, Idaho Power respectfully requests that, consistent with ORS 757.259 and  
14 OAR 860-027-0300, the Commission reauthorize the Company to defer incremental costs  
15 associated with its wildfire mitigation activities beginning January 1, 2024, until identified  
16 expenses can be included in base rates or another acceptable collection method as  
17 envisioned by OAR 860-027-0300.

18            Respectfully submitted this 29<sup>th</sup> day of December 2023.

19                                                                                     IDAHO POWER COMPANY

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21                                                                                     \_\_\_\_\_  
22                                                                                     LISA D. NORDSTROM  
23                                                                                     Attorney for Idaho Power Company  
24                                                                                     OSB # 973528

1 **CERTIFICATE OF SERVICE**

2 **UM 2270(1)**

3 I hereby certify that on December 29, 2023, 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.

7 OPUC Dockets  
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1 DATED: December 29, 2023

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*Stacy Gust*

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Stacy Gust, Regulatory Administrative Assistant

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# **Attachment A**



BEFORE THE PUBLIC UTILITY COMMISSION

1 OF OREGON

2 **UM 2270(1)**

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

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

6  
7 On December 29, 2023, Idaho Power Company ("Idaho Power" or "Company") filed  
8 an application with the Public Utility Commission of Oregon ("Commission") for an Order  
9 reauthorizing the deferral of incremental costs related to the Company's wildfire mitigation  
10 activities beginning January 1, 2024.

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

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

16 Lisa D. Nordstrom  
17 Idaho Power Company  
18 1221 West Idaho Street  
19 P.O. Box 70  
Boise, ID 83707  
[lnordstrom@idahopower.com](mailto: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 31, 2024.

3 DATED: December 29, 2023

IDAHO POWER COMPANY

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*Lisa D. Nordstrom*

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LISA D. NORDSTROM  
Attorney for Idaho Power Company

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