

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 2035

In the Matter of

IDAHO POWER COMPANY,

Application for Transportation
Electrification Plan.

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its public meeting on September 16, 2025, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



Alison Lackey

Chief Administrative Law Judge



A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. CA9

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: September 16, 2025**

REGULAR _____ **CONSENT** X **EFFECTIVE DATE** September 17, 2025

DATE: September 8, 2025

TO: Public Utility Commission

FROM: Kiran Ayub

THROUGH: Sarah Hall **SIGNED**

SUBJECT: IDAHO POWER COMPANY:
(Docket No. UM 2035)
Acceptance of 2026-2028 Transportation Electrification Plan.

STAFF RECOMMENDATION:

Accept Idaho Power Company's 2026-2028 Transportation Electrification Plan.

DISCUSSION:

Issue

Whether the Public Utility Commission of Oregon (Commission) should accept Idaho Power Company's (Idaho Power, IPC, or the Company) Transportation Electrification (TE) Plan (Plan).

Applicable Rule or Law

ORS 757.357(3) requires each electric company in Oregon to file a TE Plan for Oregon Public Utility Commission (Commission) acceptance.

Division 87 of the Oregon Administrative Rules (OAR) 860-087-0020, provide the requirements for an electric company TE Plan.¹ The objective of the Division 87 rules is to integrate the electric company's TE actions into one document and to act as a

¹ OAR 860-087-0020.

Docket No. UM 2035
September 8, 2025
Page 2

summary of the electric company's investments and activities.² A TE Plan must include:³

- a) A description of current market conditions
- b) A summary of programs and future concepts
- c) A discussion of how the TE Plan advances certain performance area categories
- d) Supporting data and analysis
- e) A discussion of potential impact on competitive EV supply equipment market
- f) Ratepayer impact
- g) A TE Budget
- h) Any new Program and Infrastructure Measure applications.

Commission acceptance of the TE Plan grants approval of the TE Budget.

Analysis

Background

Idaho Power filed its draft 2026-2028 Transportation Electrification Plan on May 1, 2025, in accordance with the TE Planning rules under Division 87 of OAR 860-087-0020.⁴ Staff hosted a workshop on May 15, 2025, in which the Company presented the Plan to stakeholders and answered questions. After a comment period, the Company filed a revised TE Plan on July 1, 2025, for Commission acceptance.⁵ Staff appreciates the work Idaho Power put into its Plan.

IPC serves approximately 21,000 customers in's Oregon service territory, which spans approximately 4,744 square miles across primarily rural and frontier counties.⁶ As of September 2024, 140 light-duty electric vehicles were registered within the service area—105 battery electric vehicles (BEVs) and 35 plug-in hybrid electric vehicles (PHEVs). Based on Energy Information Administration (EIA) trends, registrations are projected to increase to 207 in 2026, 232 in 2027, and 258 in 2028.⁷ Several structural barriers—such as long travel distances and mountainous terrain—constrain EV adoption in the region. Affordability challenges, limited dealership access, and declining local interest in EVs further contribute to obstacles to market development.⁸

² OAR 860-087-0020(1).

³ OAR 860-087-0020(3)-(4).

⁴ See Docket No. AR 654, OPUC, Order No. 22-336, September 8, 2022, p 1.

⁵ ORS 757.357(3).

⁶ Idaho Power TE Plan at 11 (May 1, 2025).

⁷ Idaho Power TE Plan at 18.

⁸ Idaho Power TE Plan at 13-14.

Docket No. UM 2035
 September 8, 2025
 Page 3

In this memo, Staff reviews the Budget and Plan, cost effectiveness, and performance areas and evaluation. Staff highlights the Company's response to Staff Comments and stakeholder feedback, before providing a recommendation.

TE Budget and Plan

The Company's TE Plan is structured around three core activities—Outreach, Customer Resources, and Technical Assistance—rather than direct investment in utility-owned charging infrastructure or the implementation of new rate structures. Idaho Power's 2026-2028 Plan budget is \$51,239, with \$16,469 for 2026 and increasing to \$17,642 for 2028.⁹ Overall, this represents a 12.7 percent increase over the 2023-2025 TE budget. In that Plan, Idaho Power's TE budget averaged \$15,155 annually.

The Company's current proposed budget is allocated across four primary categories, each reflecting an increase in absolute terms compared to the previous plan, as shown in Table 1. The updated budget places greater emphasis on marketing and educational outreach, in anticipation of continued growth in EV adoption. To support program delivery, Idaho Power has budgeted modest annual O&M increases—rising from \$16,469 in 2026 to \$17,642 in 2028—across the four main budget categories.¹⁰ These costs are fully embedded in Oregon base rates, with no new rate-base funding requested. Idaho Power remains exempt from the Monthly Meter Charge established under House Bill 2165 (2021).

The Company states it will continue to monitor EV adoption and Clean Fuels credit revenues—currently about \$14,750 annually—and adjust the TE portfolio as needed to ensure cost-effectiveness and equitable outcomes for its rural customer base.¹¹

Table 1: TE Plan Budgets Comparison¹²

Category	2026-2028 (\$)	2023-2025 (\$)	Percent change (%)
Admin Staff Labor (O&M)	27,314	25,889	5.5
Training, Education and Workshop	13,300	11,200	18.75
Admin Staff Business Expense	2,375	2,025	17.3
Marketing	8,250	6,350	30

⁹ Idaho Power TE Plan at 33.

¹⁰ Idaho Power TE Plan at 33.

¹¹ Idaho Power TE Plan at 34.

¹² Idaho Power TE Plan at 33; *In the Matter of Idaho Power Company, Application for Transportation Electrification Plan*, Docket No. UM 2035, Idaho Power Company's 2023-2025 Transportation Electrification Plan (TE Plan) (March 2023).

Docket No. UM 2035
September 8, 2025
Page 4

Staff noted in its Comments a significant underspend in 2024 within the Training, Education and Workshops category, where \$250 was spent out of an approved \$3,650 budget. In its Reply Comments, Idaho Power explained that the variance was primarily due to the absence of venue rental costs, as events were held in partnership with community organizations such as Vale Art in the Park, Kiwanis Club, and Malheur County Fair.¹³ Staff recommends that in future, if rental costs are not incurred, IPC redirect any future approved funds to other promotional activities.

Cost Effectiveness

Staff appreciates that Idaho Power conducted benefit-cost analysis of its TE Plan using the Participant Cost Test, Societal Cost Test, and Ratepayer Impact Measure, each of which demonstrates cost-effectiveness with ratios of 4.32, 3.87, and 1.38, respectively.¹⁴ Major benefits include fuel savings, federal and state EV incentives, and avoided maintenance costs. Total costs remain low due to the Plan's emphasis on non-capital initiatives.¹⁵ While the benefit-cost ratios are strong, they depend on assumptions regarding EV sales and fuel prices.

Performance Areas and Evaluation

Pursuant to OAR 860-087-0020(3)(c), the TE Plan must describe how its programs and infrastructure measures support key performance areas, including environmental benefits (e.g., greenhouse gas emissions impacts), electric vehicle adoption, and the inclusion and engagement of underserved communities. The rules also require utilities to report on performance related to equity in program offerings for underserved communities; distribution system impacts and grid integration benefits; program participation and adoption; and infrastructure performance, including charging adequacy.¹⁶

Idaho Power states that, given the characteristics of its Oregon service territory and the TE Plan's focus on education and outreach rather than infrastructure deployment, certain performance areas—particularly those related to infrastructure and equity of program offerings—are less applicable. Specifically, the Company does not report on “equity of program offerings to meet underserved communities,” as the current Plan

¹³ *In the Matter of Idaho Power Company, Transportation Electrification Plan*, Docket No. UM 2035, Idaho Power Company's Reply Comments (July 2025).

¹⁴ Idaho Power TE Plan at 33.

¹⁵ Idaho Power TE Plan at 34.

¹⁶ OAR 860-087-0020(3)(c).

Docket No. UM 2035
September 8, 2025
Page 5

does not include infrastructure measures.¹⁷ Staff finds this interpretation reasonable and consistent with prior Staff guidance.¹⁸

For equity and inclusion, the Company relies on customer survey data and trends in survey responses. Additionally, the Plan outlines methods for evaluating outreach effectiveness through measurable indicators such as social media engagement and earned media impressions, to inform ongoing program improvements. Below, Staff discusses several comments and Company response across these performance areas.

A- EV Adoption

Idaho Power's TE Plan focuses on increasing customers awareness around EV incentives, through EV webpage, bill inserts, and community events, to increase EV adoption. This may result in customers building charging infrastructure to support increased EV adoption as well.¹⁹

In its Comments, Staff requested information on how much forecasted of EV sales in high-adoption scenarios are due to Idaho Power's outreach versus broader market trends. Idaho Power acknowledged the challenge of isolating its impact from general market influences but believes its efforts have contributed to increased awareness, supported by the 2025 EV Survey. For benefit-cost analysis, the Company attributes adoption by the difference between high and medium forecasts, a method Staff has deemed reasonable.^{20 21}

B- Equity and Community Inclusion

Idaho Power's entire Oregon service territory qualifies as "underserved" under House Bill 2165, based on its rural demographic characteristics as defined in the statute.²² The Company's equity strategies include providing Spanish-language materials, collaborating with community-based organizations, and delivering inclusive messaging and support tailored to rural commercial operators.

¹⁷ Idaho Power TE Plan at 31.

¹⁸ See *In the Matter of Public Utility Commission of Oregon, Investigation of Transportation Electrification Investment Framework*, Docket No. UM 2165, Order No. 22-314, (August 26, 2022).

¹⁹ Idaho Power TE Plan at 29.

²⁰ *In the Matter of Idaho Power Company, Transportation Electrification Plan*, Docket No. UM 2035, Idaho Power Company's Reply Comments (July 2025).

²¹ <https://apps.puc.state.or.us/orders/2023ords/23-159.pdf>.

²² Idaho Power TE Plan at 30.

Docket No. UM 2035
 September 8, 2025
 Page 6

In January 2025, Idaho Power surveyed 478 residential customers to evaluate EV awareness, ownership, and attitudes.²³ The Company compared responses to similar survey conducted in 2022. EV ownership was low at 4.4 percent, with moderate awareness of public charging stations. Among 49 EV owners, key benefits cited included lower operating cost, and lower emissions, while main concerns were limited public chargers, restricted long-trip range, and the need for home charging. Non-owners showed limited familiarity and over 75 percent said they would not purchase an EV even if price and range barriers were removed.²⁴ This marks a notable rise from 2022, when less than 60 percent expressed the same view. Open-ended comments highlighted challenges such as long distances between towns and the perceived unsuitability of EVs for farming, ranching, and towing.

Staff recommended in its Comments that Idaho Power discuss the feasibility of developing a standardized post-event survey for its outreach activities. IPC responded that due to the diverse nature of events, from large county fairs to small sessions, this approach may be impractical for Idaho Power's Oregon territory. However, the Company states it remains committed to continuous improvement and will adapt programs based on community feedback. Idaho Power is also willing to collaborate with Staff to incorporate additional outreach metrics in annual reports as available.

Staff also recommended that the Company consider three in-person or online activities—in addition to the bill insert exercise. Idaho Power clarified that the Company already plans to conduct three in-person or online activities as part of its outreach efforts and provided clarification in its final TE Plan.

C- Emissions and Environmental Benefits

To quantify Green House Gas (GHG) reductions, the Plan employs two complementary methods.²⁵ However, The Plan excludes PHEV emissions “due to operational-mode uncertainty,” leaving 35 PHEVs (25 percent of the EV fleet) unquantified.²⁶ Staff recommended in its Comments that Idaho Power develop a PHEV emissions model to estimate net CO₂e reductions. In response, Idaho Power created a model calculating total emissions reductions for its 140 EVs across four scenarios: BEVs only, and BEVs

²³ Idaho Power TE Plan at 7.

²⁴ Idaho Power TE Plan, Appendix 2, Idaho Power 2025 EV Survey Results.

²⁵ First, it compares tailpipe vs. EV emissions for a 2021 Hyundai Kona—10,038 lbs CO₂e/year for the Internal Combustion Engine (ICE) version versus 2,725 lbs CO₂e/year for the EV—yielding savings of 7,313 lbs CO₂e per BEV annually. Second, it applies Oregon DEQ's grid-emissions factor (0.337 MT CO₂e/MWh) to Idaho Power's 2023 generation mix, estimating 2,863 lbs CO₂e/year for charging and net savings of 7,175 lbs CO₂e per BEV per year—about 753,411 lbs CO₂e avoided across 105 BEVs.

²⁶ Idaho Power TE Plan at 28.

Docket No. UM 2035
September 8, 2025
Page 7

plus PHEVs operating at 75 percent, 50 percent, and 25 percent electric usage.²⁷ These results quantify net transportation emissions reductions in Idaho Power's Oregon service area.

D- Grid Impact and Infrastructure Needs

Idaho Power overlaid its EV adoption forecast onto non-coincident peak load projections and concluded that no distribution upgrades will be needed through 2028 under a business-as-usual charging load profile. The Plan notes that a more detailed evaluation will be included in Idaho Power's 2026 Distribution System Plan.²⁸ Public charging infrastructure within the service territory comprises twelve sites with 38 ports. Usage data indicates that significant excess charging capacity currently exists.

The Company will continue to use consistent performance metrics to track progress in EV adoption within Oregon. These annual metrics include the number of registered BEVs and PHEVs, Electric Vehicle Supply Equipment (EVSE) port counts by type, and estimated greenhouse gas emissions reductions.

Stakeholder Engagement and Feedback

After filings its draft Plan, Idaho Power invited Comments from Staff and stakeholders. Although no stakeholder feedback/comments were received during the public comment period, the Company did reflect Staff recommendations in the Plan as noted. Over the last five years, Idaho Power has built relationships with various organizations such as Treasure Value Community College, the Four Rivers Cultural Center and Museum, the Drexel H Foundation in Vale, Ontario Chamber of Commerce, and the Ontario Kiwanis Club to provide EV educational events. The Company plans to continue partnering with environmental groups, cities, and universities to promote EVs and TE.²⁹

Conclusion

Staff recommends the Commission accept Idaho Power's TE Plan with approval of the Budget. The Plan meets the requirements laid out in OAR 860-087-020. Staff finds the proposed TE Budget is reasonable.

²⁷ *In the Matter of Idaho Power Company, Transportation Electrification Plan*, Docket No. UM 2035, Idaho Power Company's Reply Comments (July 2025).

²⁸ Idaho Power TE Plan at 21.

²⁹ Idaho Power TE Plan at 21.

Docket No. UM 2035
September 8, 2025
Page 8

PROPOSED COMMISSION MOTION:

Accept Idaho Power Company's 2026 - 2028 Transportation Electrification Plan.

CA9 – UM 2035