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VIA ELECTRONIC FILING

PUC.FilingCenter@state.or.us

Re: Docket No. AR 638
Wildfire Mitigation Plan Rulemaking

Attention Filing Center:

Idaho Power Company (“Idaho Power” or “Company”) appreciates the opportunity to respond to the scoping questions posed by the Public Utility Commission of Oregon (“OPUC” or “Commission”) Staff in Docket No. AR 638, the wildfire mitigation plan rulemaking. The Company offers the following responses to Staff’s five survey questions.

Survey Question 1: What are your objectives/expectations for wildfire mitigation?

Idaho Power has two core objectives with respect to wildfire mitigation: safety and risk reduction. Wildfire mitigation measures are essential to ensure the safety of Idaho Power’s customers and employees, to maintain reliable delivery of electricity to the Company’s retail customers in Eastern Oregon and Southern Idaho, and to be good stewards of the beautiful and natural lands within Idaho Power’s service area and beyond. Further, the Company believes that wildfire mitigation is intended to reduce risk associated with the operation of Idaho Power’s more than 310 substations, 4,800 miles of overhead transmission lines, and 19,300 miles of overhead distribution lines across its system. Idaho Power also recognizes that useful, actionable, and timely communication with customers—before, during, and after fire season—is a critical component of wildfire mitigation efforts.

Survey Question 2: What are the components of a comprehensive electric utility Wildfire Mitigation Plan (e.g., what does the table of contents look like?)?

Idaho Power has surveyed a variety of utility Wildfire Mitigation Plans (“WMP”) and identified common elements, including, but not limited to:

- Assessment of a utility’s specific service area and system,
- Methodology for assessing wildfire risk and a resulting risk assessment,
- Identification of existing and new measures to mitigate wildfire risk,
- Wildfire response plan,
- Method of evaluating WMP performance, and a
- Communications plan.

However, it is important to recognize that the mitigation measures a utility identifies in its WMP may vary depending on a given utility's service area, population density, topography and geography, weather, vegetation, and existing risk profile, among other factors. Idaho Power asks that this rulemaking allow the necessary flexibility to design and implement mitigation measures tailored to each utility.

De-energization plans—that is, Public Safety and Power Shutoff (“PSPS”) plans—are a much discussed and debated issue. While PSPS is certainly a salient and important topic, the Company believes it may be best addressed outside of—or on a parallel track to—the development of a utility's WMP.

Survey Question 3: What are your priorities and/or what are the most urgent issues to tackle before next fire season?

In light of the 2020 Labor Day fires in Oregon, Idaho Power understands the urgency of this rulemaking. However, the Company believes this question promotes an unproductive comparison of mitigation activities. For example, a shift in vegetation management strategy would not be possible to achieve before the next fire season, but a longer timeline of implementation does not make vegetation management—or another mitigation activity—any less urgent.

Considering the impact of last year's fires, Staff seems particularly focused on reactive and emergency response measures (e.g., communication during fire events). Such reactive measures are certainly important, but Idaho Power considers them distinct from the proactive measures that utilities should prioritize, such as vegetation management and proactive system hardening. Idaho Power believes that priority should be given to utility implementation of WMP measures already underway.

Survey Question 4: What questions do you have about the rulemaking process and/or WMPs?

The Company seeks clarity in several areas:

- How will PSPS be handled—within this rulemaking or on a parallel track?
- How will this rulemaking change if the state passes wildfire legislation this session?
- How is this rulemaking connected to the wildfire objectives outlined in Governor Brown's Executive Order 20-04?
- Will there be an opportunity during this rulemaking to address the recovery of costs associated with wildfire mitigation activities?

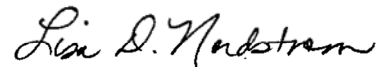
Survey Question 5: What are your other comments or concerns?

The Company has found great benefit from its participation in the Oregon Wildfire and Electric Collaborative (“OWEC”) and would hope that insights from those workshops make their way into AR 638. Additionally, as has been noted by various OWEC presenters and participants, each new wildfire season—and each wildfire—presents new and distinct challenges, as well as new opportunities to learn. As a result, WMPs must not be static. Rather, they should be

considered living documents and allowed to change based on new information and lessons learned. Further, Idaho Power would like to stress that the utilities in Oregon are not homogenous, and, as such, an effective and operational WMP may look entirely different from utility to utility.

Idaho Power is thankful to Commission Staff for its transparent and thoughtful engagement of utilities and stakeholders with respect to this rulemaking. The Company is grateful for the opportunity to comment on Staff's survey questions and looks forward to the forthcoming discussions in this matter. If you have any questions about these comments, please do not hesitate to contact me at (208) 388-5825, or Alison Williams in Regulatory Affairs at (202) 674-2447.

Very truly yours,

A handwritten signature in black ink that reads "Lisa D. Nordstrom". The signature is written in a cursive, flowing style.

Lisa D. Nordstrom

LDN:slb