LISA D. NORDSTROM
Lead Counsel
lnordstrom@idahopower.com

March 9, 2021

VIA ELECTRONIC FILING

PUC.FilingCenter@state.or.us

Re: Docket No. AR 641
Rulemaking to Review and Amend Division 001 Procedural Rules

Idaho Power Company ("Idaho Power" or "Company") appreciates the opportunity to comment on the confidential information and discovery rules under review in AR 641, the Division 001 rulemaking.

860-001-0070 Confidential Information:

Oregon Administrative Rule ("OAR") 860-001-0070(3) establishes requirements for the submission of confidential information outside of a contested proceeding in hard copy. Administrative processes adapted to remote work under COVID health directives have demonstrated that confidential information filed electronically can be securely transmitted to, and maintained within, the Public Utility Commission of Oregon ("Commission"). For environmental and operational efficiency, the requirement to provide paper copies should be eliminated.

860-001-0540 Data Requests:

The increasing size and complexity of data requests, as well as the number of data sets, resulting from the Commission's broadening scope of investigations, filings, and other proceedings have impacted Idaho Power's ability to timely respond under this rule. Data responses are prepared and reviewed by a limited number of Idaho Power personnel.

In addition to the Commission's broader proceedings, Idaho Power generally has several active cases, each with dozens of data requests being processed. The current 14-day response turn-around requirement is increasingly difficult to meet – especially if third-party data is requested or during holiday periods.

Idaho Power recommends that the 14-day requirement be revised to 21 days to better facilitate complete and accurate data responses. In certain time-sensitive matters or for more limited requests, respondents could reasonably accommodate a more expedited time frame on a case-by-case basis.

1221 W. Idaho St. (83702)
P.O. Box 70
Boise, ID 83707

860-022-0019 General Rate Revisions:

Subsection (2)(a) refers to the "most recent version of the Standard Data Requests for Energy Rate Cases" available on the Commission's website. Given the utility resources required to properly respond to the size and complexity of the Standard Data Requests, Idaho Power recommends the Commission provide utilities subject to this rule at least 60 days advance notice of prospective modifications.

860-001-0170 Filing Requirements in Contested Case and Declaratory Ruling Proceedings:

As discussed above, Idaho Power believes the value of hard copies is outweighed by the environmental benefits and operational efficiencies gained by electronic filing. This is especially true of large documents, which benefit readers with digital search functionality. Consequently, requirements to file paper copies like those found in OAR 860-001-0170(1)(f) and (g), and in -0170(2), should be eliminated.

Idaho Power appreciates the transparent and thoughtful engagement of utilities and stakeholders with respect to this rulemaking. If you have any questions about these Comments, please do not hesitate to contact me at (208) 388-5825 or Regulatory Consultant, Mark Annis at (208) 388-5208.

Very truly yours,

Lisa D. Nordstrom

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LDN:slb