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VIA ELECTRONIC FILING

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Public Utility Commission of Oregon
Filing Center
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97301

Re: AR 676 – Multi-Year Framework (HB 3179 & SB 688)

Attention Filing Center:

Idaho Power Company ("Idaho Power" or "Company") respectfully submits these comments in response to the Oregon Public Utility Commission ("Commission") Staff's ("Staff") request for comments in response to Staff's takeaways from the January 27, 2026, workshop.

1. ***Please identify goals that best align with your vision for Oregon's regulated utility energy system. For each goal, please identify 1-3 outcomes that you think are most important to prioritize in an updated ratemaking framework. Staff notes that this is a prioritization exercise and not an indication that any particular goal or outcome will be excluded.***

Idaho Power's goals and outcomes are presented in the attached table.

2. What trade-offs and/or risks should be considered in developing an MRP and/or PBR framework for Oregon?

Multi-year rate plans ("MRP") and performance-based ratemaking ("PBR") frameworks can improve rate predictability and regulatory efficiency, but they must be balanced with maintaining strong cost oversight and managing the risks that come with long-term forecasts. Performance incentives should be carefully designed so they encourage meaningful outcomes without creating incentives to optimize metrics or adding unnecessary administrative complexity. Affordability protections should also be balanced with maintaining utility financial stability and access to capital.

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3. Which MRP and other PBR mechanisms do you think could be valuable tools for helping achieve the outcomes that are important to you?

MRPs with defined reopeners can support more predictable rates while enabling longer-term reliability planning, which provides the necessary balance between customer and shareholder interests. Performance metrics are most durable when they rely on established definitions and data, are limited in number, and emphasize reliability and customer service. For example, metrics like SAIDI/SAIFI, call-center responsiveness, and customer satisfaction are all appropriate to include in a focused PBR framework tied to core service quality outcomes. These are areas where performance-based mechanisms have long-standing precedents and address overall utility responsiveness to customers. Additionally, metrics should be precisely defined, auditable, and normalized for major events where appropriate.

Targeted performance incentives tied to core service quality outcomes, combined with earnings safeguards and transparent scorecards, can strengthen accountability and help improve reliability, predictability, and customer trust.

4. Based on what you've learned about MRP/PBR and your desired outcomes from the ratemaking process and energy system, what specific aspects of Oregon's ratemaking frameworks are working well? Further, what specific areas do you see as high impact opportunities to improve? Please feel free to be as specific about process and ratemaking practices as you want.

Oregon's current ratemaking framework provides strong customer protections through rigorous cost review in general rate cases, targeted cost recovery mechanisms where appropriate, and ongoing Commission oversight. These processes have established effective guardrails that protect customers, ensure only prudent investments by utilities, and support reliable service. The Commission's existing framework and oversight also promotes transparency and accountability through discovery, testimony, and robust stakeholder participation, helping ensure that decisions are well supported, well understood, and durable over time.

High-impact opportunities for improvement include: (1) improving rate and bill predictability by reducing large step changes through a structured multi-year rate plan with clear guardrails; (2) strengthening accountability for outcomes by adopting a focused set of measurable performance metrics tied to reliability and restoration performance and customer service/satisfaction; and (3) enhancing transparency and oversight between rate cases through standardized public scorecards and annual reporting. These improvements could strengthen customer outcomes while preserving the Commission's ability to protect customers and review utility costs.

5. What additional considerations do you think are important as Oregon works to develop its MRP framework?

As Oregon develops its MRP framework, it will be important to keep the focus clear and manageable. Establishing a limited set of high-impact goals and metrics can help ensure utilities prioritize the outcomes that matter most to customers rather than spreading effort across too many measures. A focused approach can strengthen accountability, improve transparency, and allow utilities to direct resources toward reliable service and strong customer performance.

Idaho Power appreciates the opportunity to provide comments and participate in this process. The Company looks forward to continued engagement with Staff and stakeholders as this work progresses.

If you have any questions regarding this filing, please contact Regulatory Consultant Kelley Noe at knoe@idahopower.com.

Sincerely,

Connie Aschenbrenner

CA:sg

1. ***Please identify goals that best align with your vision for Oregon's regulated utility energy system. For each goal, please identify 1-3 outcomes that you think are most important to prioritize in an updated ratemaking framework. Staff notes that this is a prioritization exercise and not an indication that any particular goal or outcome will be excluded.***

Goal	Please list 1-3 high-priority outcomes associated with this goal	Please indicate which MRP and/or PBR mechanisms could help achieve this outcome	Additional Notes
Reliability and System Resilience	• Reduce outage frequency and duration • Faster restoration times/better estimates • Improved outage communication	• Risk-based capital planning within MRPs to support targeted infrastructure hardening and resilience investments • Performance metrics tracking outage duration, restoration performance, and customer communication timeliness • Scorecard reporting of outage response and communication performance to enhance transparency and continuous improvement • Performance metrics supporting wildfire mitigation and extreme weather resilience	Metrics should include normalization for major events and support continuous improvement without discouraging prudent safety shutoffs.
Financial Stability and Regulatory Predictability	• Limit bill impacts and volatility • Bill predictability	• Multi-year rate plans with predictable rate trajectories to promote bill stability • Earnings sharing mechanisms that return excess earnings to customers, moderate future rate pressure, and allow the utility a fair opportunity to earn its authorized rate of return • Capital efficiency and cost-effective non-wires solution incentives to reduce long-term system costs	Mechanisms should balance affordability protections with maintaining utility financial health and access to capital.
Customer Experience and Service Quality	• Improve call center responsiveness and service quality • Reduce complaint escalation rates • Improve connection and reconnection timelines	• Customer service performance metrics with financial incentives tied to clearly defined and achievable standards • Scorecard reporting of service quality and complaint resolution timelines • Service connection and reconnection timeliness metrics • Public performance reporting to strengthen accountability and customer trust	Metrics should prioritize clear communication and accessibility, including plain-language and multilingual communications.

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