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September 18, 2026

VIA ELECTRONIC FILING

puc.FilingCenter@puc.oregon.gov

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

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

Attention Filing Center:

Idaho Power Company ("Idaho Power" or "Company") respectfully submits its comments on Staff's O&M Concept v1 in response to the Oregon Public Utility Commission Staff's ("Staff") Phase 2 Workplan.

Idaho Power appreciates the opportunity to provide this pre-read 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

Attachment

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

Idaho Power Comments on Staff's Electric & Gas O&M Concept v1

Idaho Power appreciates the opportunity to comment on Staff's Operations & Maintenance ("O&M") Concept v1. Relative to other cost categories being considered in this proceeding, Idaho Power believes O&M expenses are generally compatible with an indexed Multi-Year Plan ("MRP") framework, provided that utilities are able to establish reasonable going-in rates and certain cost categories continue to be addressed through existing regulatory mechanisms where appropriate.

The determination of going-in rates is a critical component of any MRP and Idaho Power supports Staff's proposal to continue using Oregon's existing forward-looking test year approach for establishing going-in rates. A reasonable initial revenue requirement should be informed by historic actuals and include known and measurable adjustments that appropriately reflect operational requirements, and other information available at the time rates are established. Idaho Power believes the existing forward-looking test year methodology provides an effective means of developing and reviewing those forecasts while ensuring appropriate regulatory oversight.

Idaho Power agrees that not every difference in cost behavior warrants separate treatment. Utilities routinely manage O&M costs that increase or decrease at different rates over time, and an MRP should preserve incentives for efficient utility operations. However, certain cost categories are driven by factors that do not align well with broad inflation-based adjustments and have historically been addressed through separate regulatory mechanisms.

Accordingly, Idaho Power supports preserving the existing treatment for the following: demand-side management programs, net power supply expense, wildfire mitigation costs, Bill Discount Program, Solar PV Program and Community Solar Program. These costs are driven by factors that are distinct from general O&M inflation and are currently recovered through dedicated mechanisms approved by the Commission. Idaho Power believes continuation of these existing approaches is appropriate under an MRP framework and will help ensure recovery of prudently incurred costs while maintaining alignment with existing regulatory structures.

Overall, Idaho Power believes many of the concerns associated with O&M can be addressed through reasonable going-in rates and continued use of existing regulatory mechanisms for select cost categories.