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**VIA ELECTRONIC FILING**

December 10, 2020

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

Re: Docket No. UM 2005  
Distribution System Planning (“DSP”) Revised Guidelines – Idaho Power  
Company’s Comments

Attention Filing Center:

Idaho Power Company (“Idaho Power” or “Company”) appreciates this opportunity to provide comments on the revised guidelines on Distribution System Planning (“DSP”) filed on December 2, 2020, in the Public Utility Commission of Oregon’s (“OPUC” or “Commission”) Docket UM 2005. Given the limited amount of time between the comment deadline and the public meeting next week, Idaho Power has chosen to focus on high-level questions and concerns, rather than specific elements or language within the revised guidelines.

The revised guidelines contain many notable and positive changes, perhaps the largest of which is the division of the initial DSP process into two phases—the first phase in the fall of 2021 and the second phase in the summer of 2022. The first phase, based on Idaho Power’s assessment, will involve utilities reporting out on their existing practices and systems, while the second phase will involve more evolved DSP efforts. Idaho Power believes this is a logical and reasonable path forward. Further, it is our understanding that the doubling of the stakeholder meetings between phases 1 and 2 (from two meetings to four) was done so with the intention of allowing ample time to discuss and evaluate the specific requirements with the guidelines, which stakeholders were not offered the opportunity to discuss in any of this docket’s prior workshops.

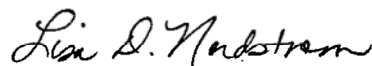
Idaho Power’s remaining comments focus on what is not present in the guidelines—specifically, clarity around DSP cadence, the firmness or flexibility of guideline requirements, and, finally, the link between DSP and IRP:

- *DSP Reporting Cycle Cadence*—The revised DSP guidelines continue to reference a two-year reporting cycle that would follow a utility’s submission of their phase 2 plan in summer of 2022. As Idaho Power noted in its earlier comments, it is our belief that the cadence of a utility’s DSP cycle should be driven by relevant factors such as growth of its customer base, development of its distribution system, and level of investment in the distribution system. If Idaho Power’s customer base in Oregon and its investment in the distribution system remains roughly the same over a two-year period, then conducting a new DSP would not yield useful or actionable information and could place an unnecessary burden on customers.
- *Flexibility of DSP guidelines*—As written, the DSP guidelines read more like requirements than guidelines. Idaho Power would appreciate acknowledgement within the guidelines, or by the Commission in its adoption of the guidelines, that the guidelines are a starting point from which to discuss reasonable and appropriate actions. Idaho Power believes the absence of this language conflicts with our understanding of the purpose of additional workshops to discuss guideline details. There is great value in further deliberation and debate over specific elements of the guidelines. Again, as written, the guidelines do not appear to reflect that there will be an evolution of the guidelines, as well as lessons learned along the way.
- *DSP-IRP Linkage*—Throughout the UM 2005 workshop, the idea of linking the DSP and IRP processes was discussed often. Yet, the guidelines do not mention how DSP will ultimately interact (if at all) with the IRP process. Clarity around the intention of eventual DSP and IRP linkage would be valuable, and a topic on which Idaho Power would appreciate being able to comment.

Once again, Idaho Power wishes to commend Commission Staff on their significant effort to develop and revise the DSP guidelines. Our primary objective at this stage is to gain clarity around elements that were not addressed or not adequately addressed in the guidelines or the introductory material. The Company requests that the Commission address the above outstanding issues as they consider adoption of the revised guidelines.

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,



Lisa D. Nordstrom

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