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April 26, 2019

VIA ELECTRONIC FILING

Attention: Filing Center
Public Utility Commission of Oregon
201 High Street SE, Suite 100
P.O. Box 1088
Salem, Oregon 97308-1088

**Re: Docket UM 2000 – In the Matter of PUBLIC UTILITY COMMISSION OF OREGON,
Investigation into PURPA Implementation**

Attention Filing Center:

In accordance with the schedule in Staff's April 10, 2019, email, Idaho Power Company ("Idaho Power" or the "Company") submits these comments related to Staff's March 15, 2019, questions and the initial scoping workshop held on April 5, 2019. Idaho Power appreciates Staff's efforts at the scoping workshop and the opportunity to file these additional comments on the process for this generic investigation into Oregon's implementation of the Public Utility Regulatory Policies Act ("PURPA").

Idaho Power understands that the Commission indicated a desire to develop an issues list before moving to the substantive phase of this case. Based on the stakeholder responses to Staff's questions and comments made at the workshop, however, Idaho Power believes that parties' efforts and resources are better served by moving directly to the substantive phase of this case. To that end, the Company recommends against developing a formal issues list. Instead, any party can raise any relevant issue in its opening testimony. In this way, this docket would unfold like a general rate case, both in terms of how issues are presented and the timeline for resolution. The Company believes that the benefit of developing a formal issues list is outweighed by the delay required to do so—particularly given the contentiousness that scoping has already created and the desire expressed by some stakeholders to devote even more time and resources to scoping, which will only serve to delay resolution of the important substantive issues involved here.

If the Commission is inclined to adopt an issues list, Idaho Power recommends that the issues be generally defined and broadly construed both to allow more expeditious development of the issues list and to minimize conflict over what issues are in or out of the scope of this case. The Company also recommends against a multi-phased approach. A single phase of the case

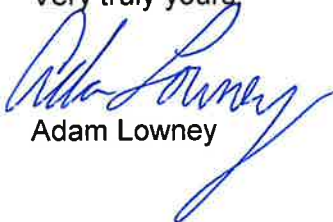
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better ensures a holistic review of the issues and prevents additional delay as parties work to decide not only what issues will be addressed, but when.

Idaho Power recognizes that its recommended approach is not how the Commission has processed prior general PURPA investigations and not how the Commission, Staff, and some stakeholders envisioned processing this case. But the Company believes that the potential for further delay and continued dispute over the scope of this case weighs against additional process. Idaho Power believes that the most expeditious way forward is to either forego a formal issues list or develop one that is general enough that it can be adopted without delay.

Idaho Power appreciates the opportunity to file these comments and looks forward to continuing to work with Staff and other stakeholders both in the scoping and substantive process of this docket.

Very truly yours,



Adam Lowney