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IDAHO PUBLIC
UTILITIES COMMISSION

LISA D. NORDSTROM
Lead Counsel
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April 22, 2021

VIA ELECTRONIC FILING

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg 8,
Suite 201-A (83714)
PO Box 83720
Boise, Idaho 83720-0074

Re: Case No. IPC-E-21-02
In the Matter of Idaho Power Company's Application for an Accounting Order
Authorizing the Deferral of Incremental Wildfire Mitigation and Insurance
Costs

Dear Ms. Noriyuki:

Attached for electronic filing, pursuant to Order No. 34781, is Idaho Power
Company's Reply Comments.

If you have any questions about the attached document, please do not hesitate to
contact me.

Very truly yours,

Lisa D. Nordstrom

LDN:slb
Attachment

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	CASE NO. IPC-E-21-02
COMPANY'S APPLICATION FOR AN)	
ACCOUNTING ORDER AUTHORIZING)	IDAHO POWER COMPANY'S
THE DEFERRAL OF INCREMENTAL)	REPLY COMMENTS
WILDFIRE MITIGATION AND INSURANCE)	
COSTS)	

Idaho Power Company ("Idaho Power" or "Company") respectfully submits the following Reply Comments in response to Comments filed by Idaho Public Utilities Commission Staff ("Staff"), Idaho Conservation League ("ICL"), and individual members of the public.

The Company is grateful for Staff's careful assessment of Idaho Power's Wildfire Mitigation Plan ("WMP") and associated incremental costs. Staff's supportive recommendations are based on diligent review and, ultimately, indicate that Idaho Power has developed a reasonable and comprehensive plan to proactively mitigate wildfire risk.

With respect to ICL, Idaho Power appreciates the group's comments and suggestions on collaborative land management. ICL recommends that the Company amend its WMP "to include specific collaboration between the land management agencies." ICL Comments at 2. Additionally, ICL suggests that Idaho Power "proactively collaborate in ongoing management planning processes to ensure the complexities of landscape management in the face of wildfires are being addressed by all stakeholders in a coordinated manner." ICL Comments at 3.

Idaho Power certainly recognizes the importance of agency coordination. To that end, many of ICL's suggestions align with efforts already undertaken or ongoing by Idaho Power. The Company initiated agency dialogue through meetings with Idaho's Bureau of Land Management ("BLM") Fire Management staff during development of the WMP. Those agency meetings helped Idaho Power gain an understanding of BLM's fire protection priorities, identify BLM datasets relevant to the Company's planning efforts, establish a rapport with BLM fire staff, and initiate discussion regarding potential, future collaborative fire mitigation projects.

Subsequent meetings with BLM's Deputy State Resource Services Director and State Fire Management Officer focused on WMP implementation, BLM District staff outreach strategies, and potential BLM prioritization of Idaho Power fire mitigation project reviews. Idaho Power continues to work with BLM to identify outreach strategies to educate BLM District staff and solicit feedback from them.

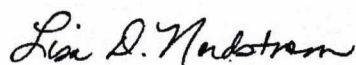
In preliminary conversations with the Company, U.S. Forest Service ("USFS") Region 4 recognized that there was no statewide forum for wildland fire management coordination. To address this gap, Idaho Power and the USFS in early 2020 discussed

potential cooperative fire mitigation strategies, resulting in Idaho Power joining the Idaho Wildfire Board (the "Board"), a new consortium of local, state, and federal agencies. The intent of the Board is to bring together different agencies working on wildland fire management in the state of Idaho. The Board's first meeting is on April 22, 2021. Idaho Power intends to leverage its participation to expand WMP coordination with USFS, Idaho Military Division, the Federal Emergency Management Agency, Idaho Department of Lands, and BLM.

ICL also suggested coordination with Governor Little's Shared Stewardship Advisory Group. While this group's scope is extensive and goes beyond wildfire collaboration, Idaho Power recognizes its value. As such, the Company has engaged with the group and will continue to follow its progress.

Finally, Idaho Power is grateful for the comments it received from its customers and the general public. The Company understands that wildfire-related issues are of great interest to the public and commends those who commented for taking the time to show their support for the Company's efforts.

DATED at Boise, Idaho, this 22nd day of April 2021.



LISA D. NORDSTROM
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of April 2021, I served a true and correct copy IDAHO POWER COMPANY'S REPLY COMMENTS upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff

Dayn Hardie
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Stephanie Buckner, Executive Assistant