

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF ROCKY MOUNTAIN ) CASE NO. PAC-E-23-18**  
**POWER’S APPLICATION FOR A )**  
**DEFERRED ACCOUNTING ORDER ) NOTICE OF APPLICATION**  
**RELATED TO INSURANCE COSTS )**  
**) NOTICE OF**  
**) MODIFIED PROCEDURE**  
**)**  
**) ORDER NO. 35913**

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On August 21, 2023, Rocky Mountain Power, a division of PacifiCorp (“Company”), applied for authority to defer incremental costs associated with the Company’s commercial insurance coverage. The Company proposes to defer Idaho’s allocated share of the incremental costs for insurance coverage. The Company estimates the incremental cost to be \$92.3 million—the difference between the \$32.7 million already included in rates and estimated insurance costs of \$125 million for policy period beginning August 15, 2023, or later. The Company would record the incremental costs as a regulatory asset in Federal Energy Regulatory Commission (“FERC”) Account 182.3-Other Regulatory Assets.

The Commission now provides this Notice of Application and establishes comment deadlines for interested persons and the Company’s reply.

**NOTICE OF APPLICATION**

YOU ARE HEREBY NOTIFIED that the Company represents that commercial liability insurance, including wildfire liability insurance, is a prudent business expense that protects both the Company and customers against financial losses from third-party claims.

YOU ARE FURTHER NOTIFIED that the Company represents that its current rates were approved to reflect a reasonable level of commercial insurance covering third-party claims.

YOU ARE FURTHER NOTIFIED that the Company represents that wildfire risks for utilities in the western United States have radically changed in the last few years, leaving it unable to obtain such insurance at past premiums due to increasing costs resulting from such fires.

YOU ARE FURTHER NOTIFIED that the Company represents that its current utility rates already include \$32.7 million for commercial liability insurance. However, the Company

estimates that commercial insurance coverage for a policy period beginning August 15, 2023, or later will cost approximately \$125 million.

YOU ARE FURTHER NOTIFIED that the Company proposes recording Idaho's allocable share of the \$92.3 million difference between the new cost and the amount currently in rates a regulatory asset in FERC Account 182.3 until the Company proposes recovery of the costs in its next general rate case.

YOU ARE FURTHER NOTIFIED that the Company acknowledges that approval of the requested deferral does not constitute approval of the recovery of those costs, which would occur (if at all) in a future case after careful review of whether such recovery is fair, just, and reasonable.

YOU ARE FURTHER NOTIFIED that the Application and Attachments are available for public inspection during regular business hours at the Commission's office. These documents are also available on the Commission's website at [www.puc.idaho.gov](http://www.puc.idaho.gov). Click on the "ELECTRIC" icon, select "Open Cases," and click on the case number as shown on the front of this document.

YOU ARE FURTHER NOTIFIED that all proceedings in this case will be held pursuant to the Commission's jurisdiction under Title 61 of the Idaho Code.

YOU ARE FURTHER NOTIFIED that all proceedings in this matter will be conducted pursuant to the Commission's Rules of Procedure, IDAPA 31.01.01.000 *et seq.*

#### **NOTICE OF MODIFIED PROCEDURE**

YOU ARE FURTHER NOTIFIED that the Commission has determined that the public interest may not require a formal hearing in this matter, and it will review the case through written submissions under the Commission's Rules of Modified Procedure Rules 201-204 of the Idaho Public Utilities Commission's Rules of Procedure, IDAPA 31.01.01.201-204. The Commission notes that Modified Procedure and written comments have proven to be an effective means for obtaining public input and participation.

YOU ARE FURTHER NOTIFIED that persons desiring to state a position on this Application may file a written comment explaining why they support or oppose the Application. Persons who would like a hearing must specifically request a hearing in their written comments. **Persons shall have until November 9, 2023, to file written comments.** Comments must be filed through the Commission's website or by e-mail unless computer access is unavailable. To

comment electronically, please access the Commission’s website at [www.puc.idaho.gov](http://www.puc.idaho.gov). Click the “Case Comment Form” and complete the form using the case number as it appears on the front of this document. To file by e-mail, the customer must e-mail the comments to the Commission Secretary and the Company at the e-mail addresses listed below. If computer access is unavailable, then comments may be mailed to the Commission and Company at these addresses:

**For the Idaho PUC:**

Commission Secretary  
Idaho Public Utilities Commission  
P.O. Box 83720  
Boise, ID 83720-0074  
[secretary@puc.idaho.gov](mailto:secretary@puc.idaho.gov)

Street Address for Express Mail:

11331 W. Chinden Blvd.  
Building 8, Suite 201-A  
Boise, ID 83714

**For Rocky Mountain Power:**

Mark Alder  
Rocky Mountain Power  
1407 W. North Temple, Suite 330  
Salt Lake City, UT 84116  
[mark.alder@pacificorp.com](mailto:mark.alder@pacificorp.com)  
[joseph.dallas@pacificorp.com](mailto:joseph.dallas@pacificorp.com)  
[carla.scarsella@pacificorp.com](mailto:carla.scarsella@pacificorp.com)

Data Request Response Center  
Rocky Mountain Power  
825 NE Multnomah St., Suite 2000  
Portland, OR 97232  
[datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

**YOU ARE FURTHER NOTIFIED** that the Company must file any reply comments by **November 30, 2023**.

**YOU ARE FURTHER NOTIFIED** that if no written comments or protests are received within the time limit set, the Commission will consider this matter on its merits and enter its order without a formal hearing. If written comments are received within the time limit set, the Commission will consider them and, in its discretion, may set the same for formal hearing.

**ORDER**

**IT IS HEREBY ORDERED** that the Company’s Application be processed by Modified Procedure, Rules 201-204. Persons interested in submitting written comments must do so by **November 9, 2023**. The Company must file any reply comments by **November 30, 2023**.

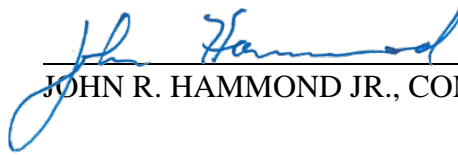
**IT IS FURTHER ORDERED** that parties comply with Order No. 35375, issued April 21, 2022. Generally, all pleadings should be filed with the Commission electronically and will be deemed timely filed when received by the Commission Secretary. *See* Rule 14.02. Service between

parties should continue to be accomplished electronically when possible. However, voluminous discovery-related documents may be filed and served on CD-ROM or a USB flash drive.

DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 7<sup>th</sup> day of September 2023.



ERIC ANDERSON, PRESIDENT

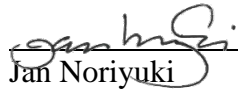


JOHN R. HAMMOND JR., COMMISSIONER



EDWARD LODGE, COMMISSIONER

ATTEST:



Jan Noriyuki  
Commission Secretary

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