

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY MOUNTAIN) CASE NO. PAC-E-26-02
POWER’S APPLICATION FOR AN)
ACCOUNTING ORDER FOR EXCESS) NOTICE OF APPLICATION
LIABILITY INSURANCE COSTS RELATED)
TO WILDFIRE LIABILITY) NOTICE OF MODIFIED
) PROCEDURE
)
) ORDER NO. 36945

On January 27, 2026, PacifiCorp, d/b/a Rocky Mountain Power (“Company”) applied to the Idaho Public Utilities Commission (“Commission”) requesting an accounting order authorizing it to establish a balancing account for tracking (1) annualized revenues associated with excess liability insurance costs related to wildfires and (2) 80 percent of any Idaho wildfire liability costs arising from wildfires that ignite on or after February 15, 2026, from February 15, 2026 until the earlier of a future wildfire reserve fund mechanism’s effective date or February 15, 2027.

The Commission now issues this Notice of Application and Notice of Modified Procedure establishing written comment deadlines.

NOTICE OF APPLICATION

YOU ARE HEREBY NOTIFIED that as part of a Commission-approved settlement in the Company’s most recent general rate case, \$8.63 million of excess liability insurance attributable to wildfire risk was included in the Company’s base revenue requirement. Application at 3. The settlement also allowed the PacifiCorp Idaho Industrial Customers and the Idaho Irrigation Pumpers Association to take part in the Wildfire Insurance Working Group, which also included the Company, P4 Productions, L.L.C., an affiliate of Bayer Corporation, and Commission Staff (collectively, “Working Group”). *Id.*

YOU ARE FURTHER NOTIFIED that the Working Group is currently working on a joint application to create a reserve fund from which the Company would recover Idaho wildfire liability costs. *Id.* The reserve fund would allow the Company to avoid maintaining commercial excess liability insurance for Idaho wildfire claims. *Id.*

YOU ARE FURTHER NOTIFIED that the Company’s excess liability insurance policy covering Idaho wildfires expired at midnight on February 14, 2026. *Id.* at 4. The parties to the

Working Group agree that the proposed reserve fund is likely to be more cost effective for customers than renewal of the Company’s excess liability insurance policy. *Id.*

YOU ARE FURTHER NOTIFIED that the Company requests Commission approval of a balancing account for tracking (1) annualized revenues associated with excess liability insurance costs related to wildfires in the amount of approximately \$8.63 million and (2) 80 percent of any Idaho wildfire liability costs arising from wildfires that ignite on or after February 15, 2026,¹ from February 15, 2026 until the earlier of a future wildfire reserve fund mechanism’s effective date or February 15, 2027—at which point the Company would re-obtain commercial coverage if the Commission denies the reserve fund mechanism. *Id.* at 4–5, 7.

YOU ARE FURTHER NOTIFIED that the Company requests authority to record the deferral in Account 254 (Other Regulatory Liabilities). *Id.* at 7. The Company anticipates deferring approximately \$0.72 million of revenue monthly. *Id.* The Company represents that it “is unable to estimate any Idaho wildfire liability claims and/or associated outside defense counsel expenses that may be deferred during this period.” *Id.* at 7–8.

YOU ARE FURTHER NOTIFIED that Staff supports the Company’s request to defer the portion of its revenue requirement approved for payment of excess liability insurance costs and any wildfire liability arising from Idaho wildfires that ignite on or after February 15, 2026. *Id.* at 4. According to the Company, no party to the Working Group has expressed opposition to the deferral request. *Id.*

YOU ARE FURTHER NOTIFIED that the Application is available for public inspection during regular business hours at the Commission’s office. The Application is also available on the Commission’s website at 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, and that all proceedings in this matter will be conducted pursuant to the Commission’s Rules of Procedure, IDAPA 31.01.01.000 *et seq.*

¹ As part of the proposed reserve fund mechanism, the Company has agreed to pay 20 percent of wildfire liabilities without seeking recovery from customers. Application at 7.

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 that it will proceed under Modified Procedure pursuant to the Commission's Rules of Procedure 201-204, 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 the person supports or opposes the Application. Persons who would like a hearing must specifically request a hearing in their written comments and explain why written comments alone are insufficient. **Persons interested in filing written comments must do so within 21 days of the service date of this Order.** 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 <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, persons must e-mail the comments to the Commission Secretary and all parties at the e-mail addresses listed below. Persons submitting a comment by e-mail must provide their name, address, and the Case Number under which they are commenting. Persons submitting a comment by e-mail also acknowledge that submitting a comment in an open case constitutes a public record under *Idaho Code* § 74-101(13), and all information provided by such person is available for public and media inspection.

If computer access is unavailable, then comments may be mailed to the Commission and the Parties at the addresses below. Persons submitting a comment by mail must provide their name, address, and the Case Number under which they are commenting. Persons submitting a comment by mail also acknowledge that submitting a comment in an open case constitutes a public record under *Idaho Code* § 74-101(13), and all information provided by such person is available for public and media inspection.

**For the Idaho Public Utilities
Commission:**

Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83702-0074
secretary@puc.idaho.gov

For the Company:

Mark Alder
Idaho Regulatory Affairs Manager
1407 W. North Temple, Suite 330
Salt Lake City, UT 84116
mark.alder@pacificorp.com

Joe Dallas
Assistant General Counsel
Rocky Mountain Power
825 NE Multnomah, Suite 2000
Portland, OR 97232
joseph.dallas@pacificorp.com

YOU ARE FURTHER NOTIFIED that **the Company must file any reply comments within 28 days of the service date of this Order.**

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 final 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 this Application be processed under Modified Procedure. Persons interested in submitting written comments must do so by within 21 days of the service date of this Order. The Company must file any reply comments within 28 days of the service date of this Order.

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 2nd day of March 2026.


EDWARD LODGE, PRESIDENT


JOHN R. HAMMOND JR., COMMISSIONER


DAYN HARDIE, COMMISSIONER

ATTEST:


Monica Barrios-Sanchez
Commission Secretary
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