

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY MOUNTAIN) CASE NO. PAC-E-26-03
POWER’S APPLICATION FOR AN ORDER)
INCREASING AND EXTENDING THE)
SHORT-TERM DEBT AUTHORITIES FIVE) ORDER NO. 37003
YEARS)
)

On March 17, 2026, Rocky Mountain Power, a division of PacifiCorp (“Company”), applied under *Idaho Code* §§ 61-901 through 61-905 and Rules 141-147 of the Commission Rules of Procedure, IDAPA 31.01.01.141-147, to the Idaho Public Utilities Commission (“Commission”) requesting an Order authorizing: (1) an increase and extension of the short-term debt authorities granted in Order No. 36171 through May 31, 2031; and (2) authorization to borrow not more than \$3.0 billion under other borrowing arrangements (“Other Arrangements”). Application at 1.

At the Commission’s April 7, 2026, Decision Meeting, Staff filed a memorandum recommending that the Commission approve the requested authority to increase and extend the Company’s credit authority.

Based on our review of the record, we issue this Final Order approving the Application as discussed below.

THE APPLICATION

The Company requested authority to borrow a total of \$6.0 billion in combined debt authorities through May 31, 2031. *Id.* Specifically, the Company requested authority to borrow up to \$3.0 billion in short-term debt and \$3.0 billion in Other Arrangements. *Id.* The Company represented that the Commission granted prior authorities in Order Nos. 29999, 32221, 33476, 34927, 35630, and 36171. *Id.* at 2–3.

The Commission’s most recent order regarding the Company’s securities issuance authority, Order No. 36171, granted the Company authority to borrow up to \$3.0 billion in short term debt for five years so long as the Company’s senior secured debt maintained an investment grade rating with Standard & Poor’s Rating Service (“S&P”) or Moody’s Investor Services, Inc.

(“Moody’s”). *Id.* at 3. The Company did not believe it received authority in Order No. 36171 to borrow an additional \$3.0 billion in Other Arrangements which it sought then. *Id.*

The Company represented it is negotiating and executing a two-year syndicated letter of credit facility designed to support appellate review of wildfire litigation in Oregon and secure appeal bonds. *Id.* at 4. The Company represented the syndicated letter of credit facility would establish a process for issuing letters of credit and count as an Other Arrangement. *Id.*

STAFF RECOMMENDATION

Staff recommended that the Commission approve the Company’s Application subject to the reporting and filing requirements recommended by Staff. Staff’s Decision Memorandum at 3. Staff believed that because the Application requested an increase to, and extension of, the authority granted in Order No. 36171, and relied on the Company’s application from Case No. PAC-E-24-07, that the Application complied with Commission rules. *Id.* at 2.

Staff recommended that the Company’s authority to borrow be conditioned on the Company maintaining an investment grade senior debt rating by S&P or higher senior debt rating by Moody’s. *Id.* Staff represented that the Company’s current senior secured debt ratings are BBB- by S&P and Baa2 by Moody’s, which Staff believed qualified as investment grade ratings. *Id.*

If the Company’s senior secured debt ratings fall below investment grade level (“Downgrade”), Staff recommended that the Company’s authority continue for 180 days from the date of the Downgrade (“Continued Authorization Period”) so long as the Company:

- (1) promptly notifies the Commission in writing of the Downgrade; and
- (2) files a supplemental application with the Commission within seven (7) days after the Downgrade requesting a supplemental order (“Supplemental Order”) authorizing the Company to continue to incur debt as provided in this Order, notwithstanding the Downgrade. Until the Company receives a Supplemental Order, any debt incurred or issued during the Continued Authorization Period would become due or mature no later than the final date of the Continued Authorization Period.

Id. at 2–3.

FINDINGS AND DECISION

The Company is an electrical corporation and a public utility in Idaho defined in *Idaho Code* §§ 61-119 and 61-129. A public utility providing electric service in Idaho may “issue, assume, or guarantee bonds or other securities,” for purposes set forth in Idaho law, and the Commission has jurisdiction to authorize a public utility to assume, issue, or guarantee securities.

Idaho Code § 61-901. Public utilities are required to apply to the Commission for an order authorizing the public utility to assume, issue, or guarantee securities. *Idaho Code* § 61-902. The application must comply with the requirements set forth in Rules 141-150 of the Commission Rules of Procedure, IDAPA 31.01.01.141-150. If the Commission finds that the proposed transactions are in the public interest, it shall enter an order authorizing the transactions. *Idaho Code* § 61-902. The Commission is required to process applications for securities within 30 days. *Idaho Code* § 61-904.

In this case, with respect to the Company's concerns and requested clarification regarding what authority was granted in Order No. 36171, we note that in Case No. PAC-E-24-07, the Company applied for authority to borrow

not more than \$3.0 billion in aggregate principal amount outstanding at any one time under one or more revolving credit agreements (Agreements); and (b) not more than \$3.0 billion in aggregate principal amount outstanding at one time under other borrowing arrangements (Other Arrangements).

Application in Case No. PAC-E-24-07 at 3. The Company requested "that the aggregate principal amounts outstanding under the Agreements, [and] Other Arrangements...not exceed \$3.0 billion at any one time." *Id.* at 3-4. In Order No. 36171, the Commission granted the Company's application to "increase and extend its current authority to borrow up to \$3.0 billion through May 31, 2029" without specifying that the Company could borrow up to \$3.0 billion in Agreements AND \$3.0 billion in Other Arrangements. Order No. 36171 at 3.

Having reviewed the Application and the record, we find that the proposed transaction is in the public interest and a formal hearing on this matter is not required. Further, we find: (1) that the proposed issuance comports with *Idaho Code* §61-901 and is within the Company's corporate powers; (2) that the Application reasonably conforms to Rules 141-150 of the Commission Rules of Procedure, IDAPA 31.01.01.141-150; and (3) that the Company has paid all fees due under *Idaho Code* § 61-905.

Accordingly, we find it is fair, just, and reasonable to grant the Company's Application, and to extend the authority granted in Order No. 36171 that provides for the Company to borrow not more than \$3.0 billion under Agreements and to borrow not more than \$3.0 billion in aggregate principal amount outstanding at any one time under Other Arrangements, for a total not to exceed \$6.0 billion in total short-term debt authorities, until May 31, 2031, all conditioned on the

Company maintaining the investment grade requirements. The Commission adds that the approval for the Other Arrangements is limited to lines of credit and issuances to support wildfire litigation, and not for other purposes. If the Company wishes to use these Other Arrangements for different purposes it will have to file for new approval.

The Commission also finds it reasonable that in the event of a Downgrade, the Company's authority to borrow shall continue for 180 days under the condition that the Company file a supplemental application with the Commission within seven days of the Downgrade requesting a Supplemental Order authorizing the Company to continue to incur debt as provided in this Order. Until the Company receives a Supplemental Order, any debt incurred or issued by the Company during the Continued Authorization Period will become due or mature no later than the final date of the Continued Authorization Period.

The Commission's Order approving the proposed financing and the general purpose to which the proceeds may be used is not a determination of Commission approval of the particular use of these funds will be put. This Order is not a Commission determination or approval of the type of financing or the related costs for ratemaking purposes. The Commission does not have before it for determination, and so does not determine, the effect of the proposed transaction on rates the Company will charge for electric service.

ORDER

IT IS HEREBY ORDERED that the Commission grants the Company's Application and extends the authority granted in Order No. 36171 that provides for the Company to borrow not more than \$3.0 billion under Agreements and to borrow not more than \$3.0 billion in aggregate principal amount outstanding at any one time under Other Arrangements, for a total authority not to exceed \$6.0 billion in total short-term debt issuances, through May 31, 2031.

IT IS FURTHER ORDERED that the Company continue to maintain investment grade ratings by S&P and Moody's for the Company's senior secured debt. So long as it does so, the authority approved by this Order shall remain in effect through May 31, 2031.

IT IS FURTHER ORDERED that if the Company's senior secured debt falls below investment grade, that the Company shall promptly notify the Commission in writing of the Downgrade.

IT IS FURTHER ORDERED that should such a Downgrade occur, the Company's authority shall continue for 180 days under the condition that the Company file a supplemental application with the Commission within seven days of the Downgrade requesting a Supplemental Order authorizing the Company to continue to incur debt as provided in this Order. Until the Company receives a Supplemental Order, any debt incurred or issued by the Company during the Continued Authorization Period will become due or mature no later than the final date of the Continued Authorization Period.

IT IS FURTHER ORDERED that the Company must continue to file quarterly reports with the Commission setting forth the date of issuance, principal amount, interest rate, date of maturity, and identity of payee for all promissory notes issued during the quarter. The Company must continue to file its capitalization ratios with the quarterly reports.


IT IS FURTHER ORDERED that the foregoing authorization is without prejudice to the regulatory authority of the Commission with respect to rates, utility capital structure, service accounts, valuation, estimates for determination of cost, or any other matter which may come before this Commission pursuant to its jurisdiction and authority as provided by law.


IT IS FURTHER ORDERED that nothing in this Order and no provisions of Chapter 9, Title 61, Idaho Code, or any act or deed done or performed in connection therewith shall be construed to obligate the State of Idaho to pay or guarantee in any manner whatsoever any security authorized, issued, assumed, or guaranteed under the provisions of Chapter 9, Title 61, Idaho Code.

IT IS FURTHER ORDERED that issuance of this Order does not constitute acceptance of the Company's exhibits or other materials accompanying the Application for any purpose other than the issuance of this Order.

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within 21 days of the service date of this Order regarding any matter decided in this Order. Within seven days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *Idaho Code* § 61-626.


DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 15th day of April 2026.


EDWARD LODGE, PRESIDENT


JOHN R. HAMMOND JR., COMMISSIONER


DAYN HARDIE, COMMISSIONER

ATTEST:


Monica Barrios-Sanchez
Commission Secretary

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