C.L. Butch Otter, Governor

Paul Kjellander, Commissioner Mack A. Redford, Commissioner Kristine Raper, Commissioner

Case No. PAC-E-15-10, Order No. 33345

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Rocky Mountain Power submits updated curtailment plan to be used during times of energy supply shortages

BOISE (July 24, 2015) – Rocky Mountain Power is asking state regulators to approve an updated plan detailing the steps the utility would take to curtail energy consumption during short-term energy supply emergencies.

The plan, last updated in 1993, is outdated by advances in technology, changes in industry practice and the utility's generation capacity, Rocky Mountain Power claims. Further, the 1993 plan addresses only long-term shortages and not the more typical short-term events.

The long-term shortages addressed in the 1993 plan addressed steps the company could take to mitigate long-term energy shortages, such as those caused by prolonged drought and operational constraints on the transmission grid. The proposed updated plan adds the more common shorter-term emergencies such as a temporary loss of generation, failed equipment, extreme weather and temperatures or a system disturbance within the Western Interconnection.

Rocky Mountain's proposed plan recognizes that the company already has demand-side management (DSM) programs under which customers reduce load during peak consumption during periods of short supply and it has large customers that already agree to be interrupted to achieve reductions in load.

The plan anticipates five stages that are used as the energy deficit increases. The first stage is to implement load shedding from customers that can be contractually interrupted or are part of the company's existing demand side management program. The second stage is a public appeal to voluntary load reduction by all customers. Third is a mandatory up to two-hour curtailment during peak hours by customers who have been grouped into blocks of about 100 megawatts near selected distribution feeders. (However, distribution feeders serving facilities essential to the public welfare are avoided during this rotational curtailment. These include, among others, hospitals, 911 centers, airports, large water and sewer treatment plants, prisons, police and fire stations and facilities critical to electric system operation.) The fourth step is a mandatory

curtailment in two-hour block rotations during peak or non-peak hours. The fifth and final step is mandatory emergency load reduction.

Under the former plan, only the State of Idaho could declare an energy emergency that would trigger curtailment. The proposed plan recognizes the role of the Western Electricity Coordinating Council (WECC) and its Regional Reliability Coordinator to implement and enforce regional reliability standards in the Western U.S. for a coordinated effort to effectively manage energy shortage situations. Emergencies that threaten the integrity of the electric system can develop at any time due to a shortage of generation or disturbances on the system, either locally or within the Western Interconnection. To prevent total collapse of the system, the proposed plan states that WECC or the Idaho Commission may order energy curtailments. However, nothing precludes Rocky Mountain Power from requesting voluntary load reduction at any time.

The proposed plan also eliminates financial penalties that could be assessed parties for noncompliance with curtailment orders.

Parties wishing to intervene in the case for the purpose of presenting evidence or cross-examining witnesses must do so by August 5. Public comments are accepted via e-mail at www.puc.idaho.gov and clicking on "Case Comment Form," under the "Consumers" heading. Fill in the case number (PAC-E-15-10) and enter your comments. Comments can also be mailed to P.O. Box 83720, Boise, ID 83720-0074 or faxed to (208) 334-3762.

The company's proposed plan and other documents related to the case are available on the commission's website. Click on "Open Cases" under the "Electric" heading and scroll down to the above case number.

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