

**AVISTA UTILITIES
POWER CURTAILMENT, COORDINATION, AND COMMUNICATION PLAN**

Summary of Key Components

*--The actions below must be followed in the steps indicated pursuant to pre-established plans and protocols.
Al Fisher is the owner and "Primary Decision Maker" (PDM) for this plan with
room 430, Spokane main office building, being the designated Incident Command Center.
Please Note: By regulation, Wholesale Marketers are "not permitted" in room 430.
--Every step must be accompanied by contact to Corporate Communications.*

	Resp. Individual	Back-up Contacts	STEPS:												
			1 Problem Identification w/ communication to PDM- (Al Fisher)	2 Incident Command Center placed on stand-by	3 Communicate with key customers	4 Curtail non-essential Avista use	5 Notify Designated Ind/Com Customers: Curtail non-firm loads	6 Media Request for Voluntary Curtailment	7 Request curtailment of specified non-essential load	8 Intensify Request prior to mandatory curtailment	9 Notify PUCs & Commence Mandatory Major Use Curtailment	10 Report to Governmental Authorities	11 Inform all customers regarding load curtailment	12 Commence curtailment by feeder per priority list	13 Energy situation "Back To Normal"
Plans and Practices															
System Operation Integrity	T. Martin	System Ops	System Ops												
Special Contracts/Agreements	D. Miller	D. Padayao			X			X							
Schedule 70N Wash/70I Idaho	T. Dukich	J. Osterberg				A.(1)			A.(2)	A(3)/A(4)/A(5)	B.(6)	C.(7)	C.(8)	C.(9)	C.(10)
NERC Energy Emergency Alerts	T. Martin	System Ops					Alert 1			Alert 2					Alert 0
State Curtailment Plan	T. Dukich	J. Osterberg													
Emergency Operating Plan	A. Fisher	P. Shea													
Essential Services/Area Mngr's	J. Cole	Area Mngr's													
Corp. Communications Plan	C. Parochetti	Media Line													
Contact Center Plan	M. Inman	C. Bryan													

Work plans in support of above:

- 3,5 Ind/Com Load Curtailment Special Agreements and implementation plans
- 7 Request for Curtailment of Non-Essential Loads Per Tariff Schedule 70 (applies to both Washington & Idaho)
- 12 Feeder Procedures/Priority List and Associated Actions
- 4,6,11 NERC Energy Emergency Alert Protocols
- 9 "Regional Curtailment Plan for Electric Energy", May 22, 1992 by the Northwest Load Curtailment Task Force
- 2,5,7,9 Avista Utilities Emergency Operating Plan
- 6,8,9,11 Corporate Communications Media Guide for Power Curtailment

**** This Plan is intended to enhance the Company's actions during situations necessitating customer curtailment. At any time, the Primary Decision-Maker (PDM) may determine that the Emergency Operating Plan should be implemented and should supercede this Plan. An example of this event would be major damage incurred at the Company's generating facilities.**

Step 1:

Problem Identification with Communication to Primary Decision Maker (Al Fisher)

- System Operations (Tom Martin) identifies curtailment problem and contacts the Primary Decision Maker (Al Fisher)
- Primary Decision Maker notifies key personnel of the problem
- Corporate Communications is notified

Step 2:

Incident Command Center Placed on Stand-by

- Primary Decision Maker or his designee contacts person responsible for the Incident Command Center (Room 430 Main Office-Spokane) to secure the room as needed
- Area Managers are notified
- Primary Decision Maker monitors the problem and activates plan as necessary
- Corporate Communications is notified

Step 3:

Communicate With Key Customers

- Sales Department sends Fax to key commercial and industrial customers advising them of the situation. The information will be sent at the discretion of the Sales and Marketing managers.
- Corporate Communications is notified

Step 4:

Curtail Non-essential Avista Use

- Primary Decision Maker contacts Rates and Tariffs Department (Tom Dukich) to let them know that Avista is complying with Washington Tariff Schedule 70N and Idaho Tariff Schedule 70I, under Section 16-Continuity Of Service, subsection A.1, and is "Initiating Curtailment Of All Non-Essential Company Use".
- Primary Decision Maker or his designee (Area Managers) contact Local Emergency Management Agencies & local government officials to advise them of our status
- Corporate Communications is notified

Step 5:

Notify Designated Industrial/Commercial Customers: Curtail "Non-firm" Loads

- Sales Department notifies industrial/commercial customers who have non-firm (interruptible) power contracts that they are now required to curtail all such loads
- System Operations notifies Primary Decision Maker we are now in a NERC Alert 1 stage (all non-firm energy sales should be curtailed)
- Primary Decision Maker contacts the Incident Commander for Avista's EOP and advises him that Avista is now at EOP Level I
- Corporate Communications is notified

Step 6:

Media Request for Voluntary Curtailment

- Primary Decision Maker notifies Rates and Tariffs (Tom Dukich) that Avista is complying with Washington and Idaho Schedule 70, A.2, and requesting to public news media that all customers voluntarily curtail all non-essential uses
- Primary Decision Maker or his designee (Area Managers) contacts the Local Emergency Management Agencies to request that they use their communication mechanisms to request all customers voluntarily curtail non-essential uses
- Corporate Communications provides a Media Release in compliance with company policies and applicable regulations

Step 7:

Request Curtailment of Specified Non-essential Loads

- System Operations notifies Primary Decision Maker that we are now in a NERC Alert 2 stage
- Primary Decision Maker notifies Rates and Tariffs (Tom Dukich) that Avista is complying with Washington and Idaho Schedule 70, A.3 requesting curtailment of non-essential use by "government agencies"; A.4 requesting voluntary curtailment of non-essential use in "all large buildings", and; A.5 directing specific requests to "major use customers" for voluntary curtailment of non-essential use
- Sales Department works with other company personnel to notify affected customers as identified in Schedule 70 above
- Primary Decision Maker contacts the Incident Commander for Avista's EOP and advises him that Avista is now at EOP Level II
- Corporate Communications is notified

Step 8:

Intensify Request Prior to Mandatory Curtailment

- Primary Decision Maker notifies Rates and Tariffs (Tom Dukich) that Avista is complying with Washington and Idaho Schedule 70, B.6 and intensifying its request to the public, including request to curtail less essential uses, and with notice that if curtailment does not occur, mandatory curtailment would be required
- Primary Decision Maker or his designee (Area Managers) request the Director of the Department of Emergency Management Communicate through the Emergency Broadcast System
- Corporate Communications provides a Media Release in compliance with company policies and applicable regulations

Step 9:

Notify PUC's & Commence Mandatory Major Use Curtailment

- System Operations notifies Primary Decision Maker that we are now at NERC Alert 3 stage
- Primary Decision Maker notifies Rates and Tariffs (Tom Dukich) that we are implementing non-voluntary curtailment in accordance with Schedule 70, C.7 and other applicable directives
- Sales Department communicates with key customers and those commercial and industrial customers necessarily affected by this stage of curtailment
- Rates and Tariffs (Tom Dukich) contacts Primary Decision Maker on any state initiated actions regarding application of the State Curtailment Plan (see 05/22/92 Plan)
- Primary Decision Maker contacts the Incident Commander for Avista's EOP and advises him that Avista is now at EOP Level III
- Corporate Communications provides Media Releases as appropriate

Step 10:

Report To Governmental Authorities

- Primary Decision Maker notifies Rates and Tariffs (Tom Dukich) and other key personnel that we are prepared to comply with Schedule 70, C.8 and will provide on request Base Load and current consumption figures to civil authorities
- Primary Decision Maker or his designee contacts Area Managers to advise them of this change
- Corporate Communications is notified

Step 11:

Inform All Customers Regarding Load Curtailment

- Primary Decision Maker notifies Rates and Tariffs (Tom Dukich) and other key personnel that we are complying with Schedule 70, C.9 by informing all customers other than Major Use Customers of the recommended means of achieving comparable load curtailment
- Corporate Communications facilitates release of this information/recommendations

Step 12:

Commence Curtailment by Feeder Per Priority List

- System Operations notifies Primary Decision Maker that it is necessary to commence curtailment by Feeder (systematic Rolling Blackouts of pre-determined feeders for a specified period of time, e.g. 30 minute blackouts)
- Primary Decision Maker notifies Rates and Tariffs we are commencing rolling blackouts as authorized per Schedule 70, C.10 which states that "In addition to the foregoing, the Company may utilize operational procedures, including voltage reduction and interruption of service, as necessary to maintain integrity of service. **Public notice will be given through news media before such operational procedures are implemented**".
- Corporate Communications provides Media Releases as required

Step 13:

Energy Situation "Back To Normal"

- System Operations notifies Primary Decision Maker when the system can return to normal
- Primary Decision Maker communicates "Back To Normal", first to key personnel and then ensures this message is sent to all company employees
- Corporate Communications provides Media Release as applicable

SYSTEM OPERATION INTEGRITY

The Company System Operator, Tom Martin, shall determine if there is a problem and subsequently contact the Primary Decision Maker , Al Fisher.

In order to maintain continuity in the company's response to problems affecting its overall system integrity, the System Operator will continue to advise the Primary Decision Maker on the status of the system.

The Primary Decision Maker shall have the responsibility of ensuring that the Company's response, according to its Power Curtailment Plan, is consistent with all other regulations and obligations.

SPECIAL CONTRACTS/AGREEMENTS

This section provides copies or excerpts of special contracts or agreements with Avista customers that allow Avista to interrupt (curtail) the customers electric service as non-firm load under certain situations.

As of August 2000, Avista has determined that only one of its commercial/industrial customers falls in this category, Potlatch Corporation in Lewiston, Idaho

COPY

ELECTRIC SERVICE AND PURCHASE
AGREEMENT

BETWEEN

POTLATCH CORPORATION

AND

THE WASHINGTON WATER POWER
COMPANY

IPUC CAUSE # WWP-E-91-S APPROVED ON AUG 16 1991

WUTC CAUSE # PETITION APPROVED ON _____

(b) Unless otherwise agreed, Potlatch's representative shall contact WWP's designated representative by 10:00 a.m. on each regular working day to request interruptible service up to and including 25,000 kW at 100% load factor and 100% power factor, specified in kW and delivered in uniform hourly amounts, for the following day, or for longer periods of time as mutually agreed. WWP's representative shall contact Potlatch's representative, by 11:00 a.m. on the same day, to offer the terms in accordance with which the Interruptible Energy Service Amount will be provided including the estimated System Avoided Energy Rate(s) and the estimated Energy Service Rate(s). By 12:00 p.m. on the day of WWP's offer, Potlatch's representative shall contact WWP's representative and accept or reject WWP's offer for interruptible service. The Interruptible Energy Service Amount for weekends, holidays, and the day following weekends and holidays shall be scheduled on a regular working day observed by WWP prior to such weekends and holidays. Energy delivered as Interruptible Energy Service Amount shall be deemed to be equal to the energy scheduled as Interruptible Energy Service Amount adjusted for interruptions pursuant to this section. Any verbal communication between the Parties concerning interruptible service scheduling shall be as specified in Exhibit H.

WWP may interrupt the delivery of the Interruptible Energy Service Amount provided hereunder whenever WWP, in its judgement, determines it does not have adequate power available to it because of a force majeure event, a deficiency of electric power in the Pacific Northwest region, to protect persons or property from injury or damage due to disturbances or emergencies on WWP's system, or because of necessary maintenance on or modification of WWP's system. Upon notice by a WWP representative, Potlatch shall interrupt its Interruptible Energy Service Amount as required by WWP. WWP will exercise its best efforts to minimize the duration of any such interruption of interruptible service. In order not to interfere unreasonably with Potlatch's operations, to the extent possible, WWP will give Potlatch advance notice of any interruption, the reason for its occurrence and the probable duration thereof. Failure of Potlatch to interrupt its Interruptible Energy Service Amount upon such notice by WWP may at WWP's discretion result in termination of interruptible service provided hereunder. WWP shall not be responsible for any damages incurred by Potlatch caused by the interruption of the Interruptible Energy Service Amount provided hereunder.

(c) If Potlatch alters the Lewiston Plant such that generation production from the Facility is increased, the Parties shall bargain in good faith for additional Interruptible Energy Service Amounts resulting from the incremental production of the Facility.

(d) WWP may offer block amounts of energy, to be used by Potlatch as a complete or partial substitute for Interruptible Energy Service Amounts, with terms and conditions different than those associated with the Interruptible Energy Service Amounts specified in Section 5(b). This offer may be originated by WWP or be based on offers received by WWP from other utilities.

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WASHINGTON
RULES AND REGULATIONS - continued

16. CONTINUITY OF SERVICE:

Electric service is inherently subject to interruption, suspension, curtailment, and fluctuation. The Company shall have no liability to its Customers or any other persons for any interruption, suspension, curtailment or fluctuation in service or for any loss or damage caused thereby if such interruption, suspension, curtailment or fluctuation results from any of the following:

- (a) causes beyond Company's reasonable control including, but not limited to, fire, flood, drought, winds, acts of the elements, court orders, insurrections or riots, generation failures, lack of sufficient generating capacity, breakdowns of or damage to facilities of Company or of third parties, acts of God or public enemy, strikes or other labor disputes, civil, military or governmental authority, electrical disturbances originating on or transmitted through electrical systems with which Company's system is interconnected and acts or omissions of third parties;
- (b) repair, maintenance, improvement, renewal or replacement work on Company's electrical system, which work in the sole judgment of Company is necessary or prudent; to the extent practicable work shall be done at such time as will minimize inconvenience to Customer and, whenever practicable, Customer shall be given reasonable notice of such work;
- (c) actions taken by Company, which in its sole judgment are necessary or prudent to protect the performance, integrity, reliability or stability of Company's electrical system or any electrical system with which it is interconnected, which actions may occur automatically or manually;
- (d) actions taken to conserve energy at times of anticipated deficiency of resources.

Automatic actions would occur through the operation of automatic protective equipment installed in Company's electrical system, including, without limitation, such equipment as automatic relays, generator controls, circuit breakers, and switches. This equipment is preset to operate under certain prescribed conditions which, in the sole judgment of Company, threaten system performance, integrity, reliability or stability.

Manual actions occur when switches, circuit breakers, relays, voltage regulators or other equipment are manually operated or when Company directs a customer to curtail its load. If manual actions are undertaken, then to the extent permitted by the operating characteristics of the electrical system, Company will perform such manual actions so that interruption, suspension, curtailment, or fluctuation of service to Customers will be accomplished in the following sequence unless it is necessary in the sole judgment of Company to vary said sequence in order to protect system performance, integrity, reliability or stability.

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Effective June 9, 1999

Issued by Avista Corporation
By

, Manager, Rates & Tariff Administration

AVISTA CORPORATION
dba Avista Utilities

WASHINGTON
RULES AND REGULATIONS - continued

16. CONTINUITY OF SERVICE: - continued

(1) Large industrial and commercial Customers to the extent that this can be done after considering Customer's load and system conditions and then, if necessary;

(2) Selected distribution feeders throughout the service area for short periods of time, alternating among circuits and avoiding, if practicable, interruptions at facilities which are essential to the public welfare, such as hospitals, other health facilities, airports, police stations, fire stations, communication facilities, domestic water pumping stations, defense installations, civil defense centers, sewage disposal plants and others and then, if necessary;

(3) Selected distribution feeders throughout the service area for longer periods of time with less alteration among circuits while continuing to avoid, if practicable, interruptions at facilities which are essential to the public welfare and then, if necessary;

(4) Customers whose functions are essential to the public welfare beginning with those Customers whose service is least essential and continuing to those whose functions are progressively more essential.

To the extent permitted by the operating characteristics of the system, Company will restore service to Customers whose service has been manually interrupted, suspended, curtailed, or fluctuated hereunder (or whose service has been automatically interrupted, suspended, curtailed, or fluctuated hereunder if such service is not automatically restored) by manually restoring service in reverse sequence to that set out above unless it is necessary in the sole judgment of Company to vary said sequence in order to protect system performance, integrity, reliability or stability.

Actions under subsection (d) above are expected to be taken only when a regional deficiency exists. Actions by the Company will be integrated with actions of other utility systems in the region taken to meet regional deficiencies. Where governmental action has designated authority to proclaim power emergencies, actions under subsection (d) above would be implemented by the Company in accordance with proclamation of such authority. The Company shall make determinations of load curtailment requirements in the absence of such authority, and the Company may, in the absence of proclamation by such authority, if the Company deems it essential to maintaining the integrity of its system or its ability to provide a power supply, implement the actions enumerated hereinafter. Action by civil authorities and by the Company to obtain load curtailment by customers other than Major Use Customers are intended to effect appropriate approximate equality of curtailment amongst all customers. If curtailment actions are undertaken, then to the extent permitted by the operating characteristics of the electrical system, such actions will be accomplished in the following sequence unless

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it is necessary in the sole judgment of the Company to vary said sequence in order to protect system performance, integrity, reliability or stability. The enumerated actions may also be taken simultaneously, or within a short period, as the situation may require.

- A. Curtailment by voluntary curtailment of nonessential uses.
- (1) Initiate curtailment of all nonessential Company use.
 - (2) Request to public news media that all customers voluntarily curtail all nonessential uses.
 - (3) Request curtailment of nonessential use by governmental agencies and institutions at all levels.
 - (4) Request voluntary curtailment of nonessential use in all large buildings.
 - (5) Direct specific requests to Major Use Customers for voluntary curtailment of nonessential use.

B. If additional curtailment is required: (If possible, Step(6) would be implemented in advance of the time it is predicted that involuntary curtailment may be needed.)

- (6) Intensify request to the public, including request to curtail less essential uses, and with notice that if curtailment does not occur, mandatory curtailment would be required.

C. In the event it appears that the above actions will not provide the required load curtailment, the Company will take the following actions, after giving notice to the Commission:

- (7) Implement nonvoluntary curtailment in accordance with governmental directives or, in absence thereof, implement nonvoluntary curtailment of all Major Use Customers by a percentage of Base Period load, which percentage shall be identical for all such customers.
- (8) Provide on request Base Period load and current consumption figures to civil authorities.
- (9) Inform all customers other than Major Use Customers of the recommended means of achieving comparable load curtailment.
- (10) In addition to the foregoing, the Company may utilize operational procedures, including voltage reduction and interruption of service, as necessary to maintain integrity of service. Public notice will be given through news media before such operational procedures are implemented.

D. As used in this rule:

- (1) "Major Use Customer" is a customer who used 75,000 Kwh in any monthly billing cycle in the Base Period, or who would use 75,000 Kwh (without curtailment) in any monthly billing cycle in the 12-month period beginning the previous August 1.

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(2) "Base Period" is the corresponding monthly billing cycle in a 12-month period ending the previous July 31.

E. The Base Period loads of Major Use Customers will be adjusted to take into account installed increase in normal load. Customers becoming Major Use Customers in the period after August 1 of the curtailment year by reason of increased usage shall have a Base Period load determined by the Company on the basis of the projected usage before curtailment. -

F. The Base Period loads of customers other than Major Use Customers may be modified where additional load requirements have occurred and where such additional load cannot be avoided during the curtailment period. A customer desiring such modification shall notify the Company with description of reasons therefor.

G. Prior to implementing Step (7), the Company will establish the Base Period load for Major Use Customers in consultation with such customers, where required.

H. In the event a customer and the Company cannot agree on the Base Period load, the matter may be submitted by the customer to the Commission, and, pending final decision by the Commission, the Base Period load shall be that determined by the Company.

I. The percentage specified for mandatory curtailment under Step(7) may be increased or decreased as system conditions require.

J. If competent public authority determine that differing percentage curtailment should apply to different uses of power, the percentages provided for under Step(7) will be modified accordingly.

K. Any customer who considers that curtailment in accordance with the provisions of this rate schedule shall impose an unusual and excessive hardship upon him, may present his reasons therefor, and a statement of the facts supporting such reasons, to the Commission.

L. Customers may schedule load curtailment in any period and in any manner to minimize economic costs, hardship or inconvenience, provided that the required load curtailment (if determined on other than a daily basis) shall be assured within each period, such period not to be longer than one month.

M. The Company shall have the right to inspect the customer's facilities and operating schedules to determine whether the customer has complied

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with load curtailment required under Steps (7) through (9). If a customer has not so complied and continues to fail to comply after receiving notice of noncompliance from the Company and adequate time to cure, the Company may discontinue service to such customer until it is assured that the customer will comply with directed load curtailment.

17. OPTIONAL PHASE AND VOLTAGE:

The Company will advise Customer of and supply him with the most suitable phase and voltage available upon established circuits. At the option of Company voltages in excess of the available distribution voltage may be supplied on request for Customers whose demands exceed 25 kw provided that only one voltage will be supplied to a Customer's premises.

18. REACTIVE POWER (POWER FACTOR) ADJUSTMENT:

Where Customer's kilowatt demand is 50 kw or more and Customer's maximum 15 minute reactive kilovolt amperes demand for that month is in excess of 48% of the kw demand, Customer will pay 50¢ per month for each reactive kilovolt ampere of such excess. The reactive kilovolt ampere demand may be determined by permanently installed instruments or by tests at reasonable intervals.

19. BALANCING OF LOAD:

Load unbalance shall not exceed 20% on single phase or 10% on three phase loads at any time on the various phase wires. On combined loads, single and three phase loads shall be measured separately.

20. LOW POWER FACTOR DEVICES:

Installations of neon, fluorescent, mercury vapor lamps or tubes or other types of gaseous tube lamps shall be corrected by Customer so that such units or groups of units have a power factor of not less than 90% lagging. Where such correction is not made there will be an additional charge of \$1.00 per kva of installed capacity provided no charge will be made for uncorrected equipment of 1/10 kva or less.

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By

, Manager, Rates & Tariff Administration

Interoffice Memorandum Transmission Operations

DATE: May 22, 2000
TO: System Operators
FROM: Tom Martin
SUBJECT: NERC Notification Requirements for Operating Emergencies

Gentlemen,

Record hot weather and unscheduled generation outages in the Southwest have increased competition on available remaining energy reserves. In the event that critical transmission paths are interrupted or additional generation is lost, Avista may not be able to obtain operating reserve at any cost. BPA may be able to commit to our request for operating reserves for one hour, due to our reserve sharing agreement, but is not required to help us for more than one hour. Avista will not be unique in this regard, as all electrical utilities in the WSCC region will be in the same situation.

As a reminder – in the event that Avista is experiencing or anticipating an operating emergency in our control area, it is our obligation to communicate to the Pacific Northwest Security Coordinator by phone and posting to our WSCC neighbors by the WSCC Information Net.

NERC explicitly details the criteria (Policy 5A 1.1 thru 1.6) to follow in the event of an operating emergency:

- **System is Burdening Others** - The system's condition is burdening other systems or reducing the reliability of the Interconnection.
- **Insufficient Resources** – The system is unable to purchase capacity to meet it's load and reserve requirements on a day-ahead basis or at the start of any hour.
- **Lack of Single Contingency Coverage** – The system's line loadings and voltage/reactive levels are such that a single contingency could threaten the reliability of the Interconnection.
- **Emergency Actions for Inability to Purchase Capacity** – The system anticipates 3% or greater voltage reduction or public appeals because of an inability to purchase emergency capacity.
- **Emergency Actions for Other Reasons** – The system has instituted 3% or greater voltage reduction, public appeals for load reduction, or load shedding for other than local problems.
- **Sabotage Incident** – The system suspects or has identified a multi-site sabotage occurrence, or single-site sabotage of a critical facility.

Copies: Randy Cloward, David Meyer, Edward Turner, Pat Damiano, Central Dispatch

B. Energy Emergency Alert Levels

Introduction

To ensure that all SECURITY COORDINATORS clearly understand potential and actual energy emergencies in the INTERCONNECTION, NERC has established three levels of Energy Emergency Alerts. The SECURITY COORDINATORS will use these terms when explaining energy emergencies to each other. An Energy Emergency Alert is an emergency procedure, not a daily operating practice, and is not intended as an alternative to compliance with NERC Operating Policies or power supply contracts.

The Security Coordinator may declare whatever Alert level is necessary, and need not proceed through the alerts sequentially.

1. Alert 1 - All available resources in use.

Circumstances:

- CONTROL AREA, RESERVE SHARING GROUP, or LOAD SERVING ENTITY foresees or is experiencing conditions where all available resources are committed to meet firm load, firm transactions, and reserve commitments, and is concerned about sustaining its required OPERATING RESERVES.
- Non-firm energy sales have been curtailed

2. Alert 2 - Load management procedures in effect.

Circumstances:

- CONTROL AREA, RESERVE SHARING GROUP, or LOAD SERVING ENTITY is no longer able to provide its customers' expected energy requirements, and is designated an ENERGY DEFICIENT ENTITY.
- ENERGY DEFICIENT ENTITY foresees or has implemented procedures up to, but excluding, interruption of firm load commitments. When time permits, these procedures may include, but are not limited to:
 - Public appeals to reduce demand
 - Voltage reduction
 - Interruption of non-firm retail loads in accordance with applicable contracts¹
 - Demand-side management
 - Utility load conservation measures

During Alert 2, SECURITY COORDINATORS, CONTROL AREAS, and ENERGY DEFICIENT ENTITIES have the following responsibilities:

- 2.1 **Notifying other Control Areas and Market Participants.** The ENERGY DEFICIENT ENTITY shall communicate its needs to other CONTROL AREAS and market participants.

¹ For emergency, not economic, reasons.

B. Energy Emergency Alert Levels

Upon request from the ENERGY DEFICIENT ENTITY, the respective SECURITY COORDINATOR shall post the declaration of the Alert level along with the registry name of the ENERGY DEFICIENT ENTITY CONTROL AREA. If requested, the Security Coordinator shall also post on the NERC web site the name of the ENERGY DEFICIENT ENTITY'S affiliated marketer that purchases the emergency energy.

- 2.2 Declaration Period.** The ENERGY DEFICIENT ENTITY shall update its SECURITY COORDINATOR of the situation at a minimum of every hour until the Alert 2 is terminated. The SECURITY COORDINATOR shall update the energy deficiency information posted on the NERC web site and pass this information on to the affected SECURITY COORDINATORS, CONTROL AREAS, and Transmission Providers.
- 2.3 Sharing information on resource availability.** CONTROL AREAS and market participants with available resources shall immediately contact the ENERGY DEFICIENT ENTITY. This should include the possibility of making operating reserves available on a recallable basis. The ENERGY DEFICIENT ENTITY shall notify the SECURITY COORDINATORS of the results.
- 2.4 Evaluating and mitigating transmission limitations.** The SECURITY COORDINATORS shall review all OPERATING SECURITY LIMITS and transmission loading relief procedures in effect that may limit the ENERGY DEFICIENT ENTITY'S scheduling capabilities. Where appropriate, the SECURITY COORDINATORS shall inform the Transmission Providers under their purview of the pending ENERGY EMERGENCY and request that they increase their Available Transfer Capability (ATC) by actions such as restoring transmission elements that are out of service, reconfiguring their transmission system, adjusting phase angle regulator tap positions, implementing emergency operating procedures, and reviewing generation redispatch options.
- 2.4.1 Notification of ATC adjustments.** Resulting increases in ATCs shall be simultaneously communicated to the ENERGY DEFICIENT ENTITY and the market via posting on the appropriate OASIS sites by the Transmission Providers.
- 2.4.2 Availability of generation redispatch options.** Available generation redispatch options shall be immediately communicated to the ENERGY DEFICIENT ENTITY by its SECURITY COORDINATOR.
- 2.4.3 Evaluating impact of current transmission loading relief events.** The SECURITY COORDINATORS shall evaluate the impact of any current transmission loading relief events on the ability to supply emergency assistance to the ENERGY DEFICIENT ENTITY. This evaluation shall include analysis of system security and involve close communication among SECURITY COORDINATORS and the ENERGY DEFICIENT ENTITY.
- 2.4.4 Initiating inquiries on reevaluating OPERATING SECURITY LIMITS.** The SECURITY COORDINATORS shall consult with the CONTROL AREAS and Transmission Providers in their SECURITY AREAS about the possibility of reevaluating and revising OPERATING SECURITY LIMITS.
- 2.5 Coordination of emergency responses.** The SECURITY COORDINATOR shall communicate and coordinate the implementation of emergency operating responses.

B. Energy Emergency Alert Levels

- 2.6 **ENERGY DEFICIENT ENTITY actions.** Before declaring an Alert 3, the ENERGY DEFICIENT ENTITY must make use of all available resources. This includes but is not limited to:
- 2.6.1 **All generation units available for quick-start are on line.** All generation capable of being on line in the time frame of the emergency is on line including quick-start and peaking units, regardless of cost.
 - 2.6.2 **Purchases made regardless of cost.** All firm and non-firm purchases have been made, regardless of cost.
 - 2.6.3 **Non-firm sales recalled and interruptible loads curtailed.** All non-firm sales have been recalled and interruptible retail loads curtailed within provisions of the sale agreement.
 - 2.6.4 **Operating Reserves.** Operating reserves are being utilized such that the ENERGY DEFICIENT ENTITY is carrying reserves below the required minimum or has initiated emergency assistance through its operating reserve sharing program.

3. **Alert 3 - Firm load interruption imminent or in progress.**

Circumstances:

- CONTROL AREA or LOAD SERVING ENTITY foresees or has implemented firm load obligation interruption. The available energy to the ENERGY DEFICIENT ENTITY, as determined from Alert 2, is only accessible with actions taken to increase transmission transfer capabilities.
- 3.1 **Continue actions from Alert 2.** The SECURITY COORDINATORS, and the ENERGY DEFICIENT ENTITY, shall continue to take all actions initiated during Alert 2. If the emergency has not already been posted on the NERC web site (see paragraph 2.1), the respective SECURITY COORDINATORS will, at this time, post on the web site information concerning the emergency.
 - 3.2 **Declaration Period.** The ENERGY DEFICIENT ENTITY shall update its SECURITY COORDINATOR of the situation at a minimum of every hour until the Alert 3 is terminated. The SECURITY COORDINATOR shall update the energy deficiency information posted on the NERC web site and pass this information on to the affected SECURITY COORDINATORS (via the SCIS), CONTROL AREAS, and Transmission Providers.
 - 3.3 **Use of Transmission short-time limits.** The Security Coordinators shall request the appropriate Transmission Providers within their Security Area to utilize short-time transmission limits in order to increase transfer capabilities into the ENERGY DEFICIENT ENTITY.
 - 3.4 **Reevaluating and revising OPERATING SECURITY LIMITS.** The Security Coordinator of the ENERGY DEFICIENT ENTITY shall evaluate the risks of revising Operating Security Limits on the reliability of the overall transmission system. Reevaluation of Operating Security Limits shall be coordinated with other SECURITY COORDINATORS and only with the agreement of the CONTROL AREA or Transmission Provider whose equipment would be affected. The resulting increases in transfer capabilities shall only be made available to

B. Energy Emergency Alert Levels

the ENERGY DEFICIENT ENTITY who has declared an Energy Emergency Alert 3 condition. OPERATING SECURITY LIMITS shall only be revised as long as an Alert 3 condition exists or as allowed by the CONTROL AREA or Transmission Provider whose equipment is at risk. The following are minimum requirements that must be met before OPERATING SECURITY LIMITS are revised:

- 3.4.1 ENERGY DEFICIENT ENTITY obligations.** The deficient CONTROL AREA or LOAD SERVING ENTITY must agree that, upon notification from its SECURITY COORDINATOR of the situation, it will immediately take whatever actions are necessary to mitigate any undue risk to the INTERCONNECTION. These actions may include load shedding.
- 3.4.2 Mitigation of cascading failures.** The SECURITY COORDINATOR shall use his best efforts to ensure that revising OPERATING SECURITY LIMITS would not result in any cascading failures within the INTERCONNECTION.
- 3.5 Returning to pre-emergency OPERATING SECURITY LIMITS.** Whenever energy is made available to an ENERGY DEFICIENT ENTITY such that the transmission systems can be returned to their pre-emergency OPERATING SECURITY LIMITS, the ENERGY DEFICIENT ENTITY shall notify its respective SECURITY COORDINATOR and downgrade the Alert.

 - 3.5.1 Notification of other parties.** Upon notification from the ENERGY DEFICIENT ENTITY that an Alert has been downgraded, the SECURITY COORDINATOR shall notify the affected SECURITY COORDINATORS (via the SCIS), CONTROL AREAS, and Transmission Providers that their systems can be returned to their normal OPERATING SECURITY LIMITS.
- 3.6 Reporting.** Any time an Alert 3 is declared, the ENERGY DEFICIENT ENTITY shall complete the report listed in appendix 9B, Section C and submit this report to its respective SECURITY COORDINATOR within two business days of downgrading or termination of the Alert. Upon receiving the report, the SECURITY COORDINATOR shall review it for completeness and immediately forward it to the NERC staff for posting on the NERC web site. The SECURITY COORDINATOR shall present this report to the SECURITY COORDINATOR SUB-COMMITTEE at its next scheduled meeting.
- 4. Alert 0 - Termination.** The SECURITY COORDINATOR shall notify all other SECURITY COORDINATORS via the SCIS when an Energy Emergency Alert has ended. The SECURITY COORDINATOR shall also notify the affected CONTROL AREAS and Transmission Providers when an Energy Emergency Alert has ended by posting this information on the NERC web site.

CONDENSED VERSION

REGIONAL CURTAILMENT PLAN

FOR ELECTRIC ENERGY

May 22, 1992

CONDENSED VERSION
REGIONAL CURTAILMENT PLAN
FOR ELECTRIC ENERGY

within the States of Washington, Oregon, Idaho, and Montana

SECTIONS I AND II. PURPOSE AND OVERVIEW OF THE REGIONAL CURTAILMENT PLAN

This Plan identifies the process by which the States of Washington, Oregon, Idaho, and Montana would initiate and implement regional load curtailment. Included in the Plan are detailed procedures to be followed during a protracted regional electrical energy shortage to ensure uniform treatment of all regional consumers. The Plan is not intended to be activated for relatively short-term emergencies such as those caused by extremely cold weather or the temporary loss of a major transmission line, even if individual States take action to alleviate the problem.

The goal of this Plan is to accomplish curtailment while treating consumers fairly and equitably, minimizing adverse impacts from curtailment, complying with existing State laws and regulations, and providing for smooth, efficient, and effective curtailment administration. This Plan serves as a guideline or blueprint for each of the four Pacific Northwest States to use in developing their individual State curtailment plans.

SECTION III. DEFINITIONS

The following definitions apply to terms used in this Regional Curtailment Plan and in individual State plans. If the first letter(s) of the term are shown in parentheses, the term may appear in either upper case or lower case throughout the Plan.

- A. Base Billing Period. One of the billing periods comprising the Base Year. Billing Periods are established by the utility and are normally either monthly or bimonthly. Base Billing Period data are weather-normalized before being used to calculate the amount of curtailment achieved.
- B. Base Year. Normally, the 12-month period immediately preceding imposition of State-initiated load curtailment. If energy use during that period is atypical, States may select a different 12-month period.
- C. Critical Load Consumer. A consumer that supplies essential services relating to public health, public safety, or energy production.

- D. Curtailement. Load reduction, irrespective of the means by which that reduction is achieved.
- E. Curtailement Target. The maximum amount of energy that a consumer may use and still remain in compliance with the State curtailement order; the Curtailement Target is figured individually for each consumer by Base Billing Period.
- F. Excess Power Consumption. The lower of the following two values for loads subject to penalty: (1) the difference between a consumer's actual (or metered) consumption level during a billing period and the Curtailement Target, or (2) the difference between the consumer's weather-normalized energy use during a billing period and the Curtailement Target.
- G. Extra-Regional. Any load, resource, or entity located outside of the region as defined in section 3.(14) of P.L. 95-501, the NW Power Act.
- H. General Use Consumer. Any non-residential consumer who does not qualify as a Major Use Consumer.
- I. Implementation Record. The collection of significant notes, memos, correspondence, and other material generated for each curtailement, whether such documents are formal or informal in nature. The Utility Coordinator is responsible for maintaining the Implementation Record.
- J. Major Use Consumer. A consumer who has purchased over 5 average annual megawatts (43,800 MWh) during the Base Year.
- K. Non-Regional. Any load, resource, or entity located outside of the region as defined in this Plan.
- L. Plan. This Regional Curtailement Plan.
- M. Region. The States of Washington, Oregon, Idaho, and those portions of Montana that are west of the Continental Divide and/or within the control area of the Montana Power Company.
- N. Regional Electric Energy Curtailement Analysis Model (REECAM). A computer program used by the Utility Coordinator and other interested parties to evaluate the status of the regional electric power system and analyze the need for region-wide curtailement.
- O. Regional Load. The load placed by ultimate consumers within the region on their respective utility suppliers; the load subject to curtailement under this Plan.
- P. State. Any of the four Pacific Northwest States: Washington, Oregon, Idaho, and Montana.
- Q. State Contact(s). Individuals who represent their respective States in connection with curtailement issues.

- R. State-Initiated. Actions taken by the States to implement their individual State load curtailment plans.
- S. Threshold Consumption Level. The maximum amount of energy that a consumer can use during mandatory load curtailment without being subject to penalties under this Plan.
- T. Utility Contact(s). Individuals who represent their respective utilities in connection with curtailment issues.
- U. Utility Coordinator. The Director of the Northwest Power Pool.
- V. Utility Curtailment Reports. Report(s) summarizing curtailment data; such reports are to be submitted monthly by utilities to their respective States and the Utility Coordinator.
- W. Weather-Normalization. The procedure that utilities use to reflect the impact of weather on utility load levels. Some utilities refer to this process as "weather-adjustment."

SECTION IV. CURTAILMENT STAGES

State curtailment directives apply to all Regional Loads. Under the Plan, curtailment is requested or ordered as a percentage of historical, weather-normalized (Base Billing Period) electric energy consumption. Although the curtailment stages are generally associated with increasing deficits, the stages are not necessarily implemented in a sequential manner; the Plan is flexible so as to allow States to move from one curtailment stage to another as required to adapt to rapid and dramatic changes in the energy supply situation.

The five curtailment stages are:

<u>Stage #</u>	<u>Nature</u>	<u>Curtailment %</u>	<u>Type of Curtailment</u>
Stage 1	<u>Voluntary</u>	<u>No Specified %</u>	Uniform among all regional consumers
Stage 2	<u>Voluntary</u>	<u>5% +</u>	Uniform among all regional consumers
Stage 3	Mandatory	5% - 15%	Uniform among all regional consumers
Stage 4	Mandatory	15% 15% + 15% +	Residential Consumers General Use Consumers Major Use Consumers
Stage 5	Mandatory	% Associated with Stage 4 + additional curtailment	Continued Consumer Curtailment plus Utility Action, including Plant Closures and possible Black-Outs

SECTION V. INITIATION OF REGIONAL LOAD CURTAILMENT

Using REECAM (described in Appendix A of the Plan) and other analytical tools, the Utility Coordinator shall monitor the region's energy situation and notify State and Utility Contacts when it appears that a protracted energy shortage could be developing. The State Contacts, in consultation with the Utility Coordinator, Utility Contacts, and other interested parties, will analyze the results of REECAM to determine if regional load curtailment is required. If they agree on the need, they will settle on the appropriate stage and level (percentage reduction), consult with others within their respective States using briefing materials prepared by the Utility Coordinator, and then again coordinate with each other. To the extent changes in the original recommendation are indicated as a result of such intra-State consultations, the State Contacts will work together to reach a new consensus. The State Contacts will then begin developing situation-specific curtailment implementation procedures. The States will initiate region-wide load curtailment by notifying the public, the Utility Coordinator, and all utilities operating within their respective borders that load curtailment is in effect.

SECTION VI. ADMINISTRATION OF STATE-INITIATED CURTAILMENT

A. Utility Activities

(1) Overview

- (a) Ability of Utilities to Comply with Plan Requirements. Utilities will conform to the requirements of their respective State plans to the extent possible. Utilities may petition their States for exemption from specific requirements of their State plan.
- (b) Stage-by-Stage Utility Administrative Obligations. Upon notice that their respective States have called for regional load curtailment, the region's utilities shall immediately begin complying with the directives of their State plan(s). All requirements for lower level stages continue to apply to higher level stages. Throughout the curtailment period, utilities will provide consumers with as much useful information as they reasonably can. The requirements specified below represent the minimum actions that each utility must take to remain in compliance with the Plan.
 - **Stage 1.** Utilities must begin (or continue if they have already begun) providing curtailment information to their consumers. Both the nature of the information and the means by which they convey it to consumers (media communications, bill stuffers, etc.) are left to the utility. Utilities shall also assist States, as appropriate, in briefing the media about the shortage.
 - **Stage 2.** In Stage 2, utilities must: (a) notify their consumers of the percentage level of State-initiated voluntary curtailment; (b) provide curtailment tips to consumers; (c) answer consumer questions about curtailment; (d) provide curtailment reports to the States and the

Utility Coordinator; and (e) provide more detailed information to the media than provided in Stage 1.

- **Stage 3.** In Stage 3, utilities must: (a) notify their consumers of the percentage level of State-ordered mandatory curtailment; (b) calculate weather-normalized Base Billing Period data and Curtailment Targets for all consumers who will be audited in the current billing period; (c) provide Curtailment Targets to all consumers who request such data for their own accounts; (d) provide audited consumers with information about how to apply for exemption and adjustment of Base Year data; (e) process requests for exemption and Base Year data adjustments from those consumers selected for audit who would otherwise be subject to penalties; and (f) implement the penalties aspect of the Plan.
- **Stage 4.** In Stage 4, utilities must notify their consumers of any applicable changes in State-initiated mandatory curtailment.
- **Stage 5.** In Stage 5, utilities must collaborate with the States to develop and implement the most effective methods for securing the required load curtailment.

(2) Suggested Curtailment Actions.

Utilities shall disseminate information to consumers regarding actions they can take to reduce their electric energy consumption. The States and utilities will work together to develop this material. The recommendations will be based on the actions described in Appendix C of the Plan, "Curtailment Measures." Utilities will be responsible for tailoring this curtailment information to their service areas, adding utility-specific information, printing, and disseminating the material to their consumers.

(3) Base Year Data and Curtailment Targets.

- (a) Identification of the Base Year. Each time the Plan is activated, the States will identify the applicable Base Year. Once established, the Base Year for a shortage will remain unchanged throughout the curtailment period. Normally, the Base Year is the 12-month period immediately preceding initiation of load curtailment under this Plan. Base Year and Base Billing Period data shall be weather-normalized using the utility's standard procedures. The States may choose an alternative Base Year if they decide that the data for the 12-month period preceding load curtailment is atypical and its use would result in an inequitable allocation of curtailment among the region's consumers.
- (b) Estimating Base Billing Period Data for Consumers for Whom No Base Billing Period Data Exists. Base Billing Period data must be obtained or developed for any consumer who is audited under this Plan. Utilities have the option of excluding residential and General Use

Consumers without actual Base Billing Period data from the random sample of audited consumers. Utilities must estimate the Base Billing Period data for any audited consumer for whom actual data does not exist or is found to be inaccurate.


- (c) **Communicating Curtailment Target Information to Consumers.** During mandatory curtailment, utilities are required to provide retrospective, current billing period, and forthcoming billing period Curtailment Target information to any consumer who so requests. Utilities are also required to provide retrospective Curtailment Target information to any audited consumer who will be issued a warning or penalty. At their option, utilities may provide Curtailment Target information to other consumers or consumer classes as well.

- (4) **Auditing Consumers for Compliance with State Orders for Mandatory Load Curtailment.** Each month, utilities must audit at least one percent of residential users, five percent of General Use Consumers, and 100% of their Major Use Consumers (including those Major Use Consumers with estimated Base Billing Period data) plus any consumers penalized in the previous billing period. The number of consumers exempted or excluded from audit does not affect the sample size.

New samples shall be drawn each month. Consumers penalized under this Plan shall continue to be audited until their energy use falls below the Threshold Consumption Level. Once their energy use falls below that level, they will be audited again only if selected by random sample.

Unless a utility is auditing 100% of its residential users and General Use Consumers, all such consumers selected for audit shall be chosen on a random sample basis, except that the following consumers are to be excluded:

- (a) consumers granted an exemption under this Plan; and (b) consumers with an estimated power bill in the current billing period. Utilities may also choose to exclude consumers with estimated Base Billing Period data, assuming the States do not require their inclusion in the pool of consumers subject to audit.

- 
- (5) **Penalties for Non-Compliance.**

- (a) **Nature of Penalties.** The Plan identifies penalties for non-exempted consumers who fail to comply with State orders for mandatory curtailment. The penalties under this Plan are structured as follows:

<u>Violation *</u>	<u>Penalty</u>
First Bi-monthly Violation	10¢ per kWh of excess use
Second Bi-monthly Violation	20¢ per kWh of excess use
Third Bi-monthly Violation	40¢ per kWh of excess use
Fourth Bi-monthly Violation	1 Day Disconnection + 40¢ per kWh of excess use

Fifth Bi-monthly Violation	2 Day Disconnection + 40¢ per kWh of excess use
Sixth and All Subsequent Violations	Penalties are determined by the State. Civil penalties or other corrective actions would be possibilities.

* The penalty for violators who are billed every two months will escalate on every power bill in which they are subject to penalty. Consumers billed on a monthly basis will be assessed the same penalty on two successive occasions before incurring the next higher level penalty. During any continuous period of curtailment, assessed penalties remain "on the record" for the purposes of administration of subsequent penalties, even if there has been an intervening period of "compliance."

Utilities are expected to adhere to their standard disconnect criteria and procedures whenever disconnecting consumers in accordance with this Plan. Health, safety, and welfare considerations are to be taken into account, and consumers must pay normal disconnect and reconnect charges.

(b) **Calculation of Financial Penalties.** Financial penalties will be calculated by multiplying the consumer's Excess Power Consumption each billing period by the appropriate penalty level identified above.

(1) **Threshold Consumption Level.** The Threshold Consumption Level assigned to each consumer class is identified in the table below. If the required load reductions are not occurring during a curtailment period, the States may change the percentage relationship of the Threshold Consumption Level to the Curtailment Target so as to effect better compliance with the curtailment order.

<u>Type of Consumer</u>	<u>Threshold Consumption Level</u>
Residential Consumers	10% above Curtailment Target
General Use Consumers	10% above Curtailment Target
Major Use Consumers	2% above Curtailment Target

(2) **Excess Power Consumption Calculation.** Penalties are not assessed if a consumer's load (either actual load or weather-normalized load) is equal to, or less than, the Threshold Consumption Level. Excess Power Consumption is the lower of the following two values for each sampled load subject to penalty: (a) (Actual Load) minus (Curtailment Target) or (b) (Weather-Normalized Load) minus (Curtailment Target).

(c) **Assessment of Penalties.**

- (1) **Penalties vs Warnings.** Consumers will be assessed penalties only if they have Excess Power Consumption and if they are to be penalized based on the utility's penalty assessment procedures described below. Any sampled consumer who is not penalized and whose use exceeds the Curtailment Target will receive a warning.
- (2) **Penalty Assessment Procedures.** Utilities sampling at the mandated minimum percentages for each sector as specified in this Plan [1%-5%-100%] (or as otherwise specified by the States and reflected in the Implementation Record) shall assess penalties on all consumers with Excess Power Consumption.

Utilities sampling a higher percentage of consumers than required under the Plan may choose among the following penalty assessment options:

- (a) Assess penalties on all sampled consumers with Excess Power Consumption; (this methodology must be used for Major Use Consumers even if the utility chooses option (b), below, for its other consumer sectors); or
- (b) Develop a ratio of the minimum percentage sample size to the actual percentage sampled for the residential and/or General Use consumer sectors. Multiply the resulting percentages by the total number of violators in each respective consumer sector to determine the minimum number of penalties that must be assessed in each sector. Calculate the percentage violation for each individual consumer that has been sampled (Excess Power Consumption divided by Curtailment Target) and apply penalties to the "worst offenders" in the overall sample based on their percentage "Excess Power Consumption." Also penalize all consumers who were penalized in the previous billing period and who still have Excess Power Consumption.

- (3) **Treatment of DSIs.** Penalties applicable to BPA's direct-service industrial customers will be assessed by the States based on billing data provided by BPA.

- (d) **Billing Consumers for Penalties.** Utilities may describe the penalty on the power bill as "State-mandated" and shall include any State-provided material describing the penalty aspect of the Plan as a bill stuffer in the bills of penalized consumers. The States will consider printing this material on State letterhead so as to reinforce the public's understanding that penalties are due to a violation of State mandate. Utilities shall note

that failure to pay penalties will result in service disconnection in accordance with standard disconnect criteria and procedures.

- (e) **Treatment of Penalties Pending Adjustment/Exemption Determinations.** Consumers who have applied for adjustment of Base Billing Period data and/or exemption from mandatory curtailment may request a stay of enforcement of the penalty aspect of the Plan pending a final decision regarding its request. Any consumer who has been granted such a stay shall be subject to retroactive penalties as applicable if the request is ultimately denied.
 - (f) **Use of Funds Collected under the Penalty Provisions of the Plan.** Funds collected under State-ordered penalty provisions of this Plan shall be set aside in a separate account. The ultimate disposition of these funds will be determined by the appropriate State commission in the case of investor-owned utilities and by the governing bodies of publicly-owned utilities.
- (6) **Incentives.** Whenever curtailment is in effect, individual utilities are encouraged to implement creative incentive programs to motivate consumers to provide additional load reductions relative to their Curtailment Targets.
- (7) **Exemptions and Adjustments.**
- (a) **Consumer Application for Exemption/Adjustment.** Utilities are responsible for informing their consumers how to apply for exemption from Plan requirements or adjustment of Base Billing Period data. Utilities may elect to process exemptions and adjustments only for audited consumers. Consumers seeking an exemption or adjustment shall apply first to their utility and then, if dissatisfied with that outcome, to their respective State. The State will not consider any consumer's appeal unless it has first been processed by the consumer's utility.
 - (b) **Granting Consumer Requests for Exemption from Mandatory Curtailment.** No automatic consumer exemptions will be granted under mandatory State-initiated load curtailment. Exempted consumers should be told that exemption may not protect them from Stage 5 black-outs.
 - **Critical Load Consumers.** Critical Load Consumers may be exempted once they have demonstrated to their utility that they have eliminated all non-essential energy use and are using any reliable, cost-effective back-up energy resources in load.
 - **Other Consumers.** Exemptions for consumers not qualifying as Critical Load Consumers under this Plan will be evaluated based on whether curtailment would result in unreasonable exposure to health or safety hazards, seriously impair the welfare of the affected consumer, cause extreme economic hardship relative to the amount of energy saved, or produce counterproductive results.

- (c) **Utility Record-Keeping Relative to Consumer Exemptions.** Utilities shall make their records regarding exemption determinations available to their respective States upon request.
 - (d) **Utility Exemption from State Plan Requirements.** Utilities may appeal to their respective States, requesting an exemption from any aspect of their State plan. Their petition for exemption should identify the specific requirements from which they wish to be exempted, the reason(s) behind their request, and alternative actions that they can reasonably take in lieu of such requirements.
- (8) **Measurement of the Amount of Curtailment Achieved and Determination of Compliance.** At all times during State-initiated regional load curtailment, utilities shall provide their respective States and the Utility Coordinator with consumption and savings data on a monthly basis in the form specified in Appendix D of the Plan. To the extent that circumstances at the time of actual load curtailment dictate the need for additional data or more frequent data submittal, the States shall so inform the utilities and the utilities shall use best efforts to comply with the State request.
- (9) **Special Arrangements.**
- (a) **Use of Consumer-Owned Generation Facilities.** The States' mandatory curtailment orders apply only to electric energy purchased from a utility: all consumers are required to reduce their electric energy purchases from their utility by the required percentage. However, consistent with their respective utility's needs for safety and system protection, consumers having their own generation facilities or access to electricity from non-utility power sources may use energy from those other sources to supplement their curtailed power purchases from their electric utility.
 - (b) **Curtailment Scheduling.** During periods of mandatory curtailment, a consumer is obligated to provide the requisite amount of curtailment within each billing period. Within that period, and subject to equipment limitations and utility rules on load fluctuations, consumers are free to schedule their curtailment so as to minimize the economic cost, hardship, or inconvenience they experience as a result of the mandatory curtailment requirement.
 - (c) **Case-by-Case Arrangements.** Utilities may choose to work creatively with individual consumers to secure additional curtailments as appropriate.

B. **State Activities**

- (1) **Providing Curtailment Information to Utilities.** States shall provide utilities with information regarding curtailment administration and work with utilities to

develop consumer curtailment tips for consumers. (See Plan Appendix B, "Types of Curtailment Information" and Appendix C, "Curtailment Measures.")

- (2) **Processing Utility Requests for Exemption and Second Level Consumer Appeals for Adjustments and/or Exemptions.** The States shall process utility requests for exemption from Plan requirements and consumer requests for either exemption or adjustment of Base Year data in cases where the consumer is appealing its utility's determination. The States shall keep interested parties apprised of the status of appeals-in-process.

- (3) **Periodic Reassessment of Administrative Decisions and Maintenance of the Implementation Record.** Together, the States will review the appropriateness and continued applicability of implementation decisions on a monthly basis, or as otherwise indicated. Significant decisions shall be recorded in the Implementation Record. The types of matters that will be addressed in the periodic reviews and which may be reflected in materials that will become part of the Implementation Record include:
 - **Achievements and Objectives.** Analysis of the amount of curtailment actually achieved based on the data provided in the Utility Curtailment Reports and a review of the most recent REECAM results;

 - **Curtailment Stage and Level.** Identification of the applicable curtailment stage and level; also, any identified procedures for changing the applicable curtailment stage and/or level;

 - **Public Information.** The general agreement among the States as to how to disseminate the curtailment message: tenor of messages, dates of announcements, specifics as to utilized media, etc.;

 - **Base Year Consumption.** The Base Year to be used for measuring curtailment impacts;

 - **Procedural Matters.**
 - (a) Development of additional administrative procedures as required;
 - (b) Assessment of the need, if any, for making changes to the Plan to secure increased compliance with the curtailment directives;
 - (c) Discussion of implementation problems and proposed solutions thereto; and
 - (d) Evaluation of the appropriateness of the materials being made available to utilities and provided by utilities to the States, and a determination as to whether changes are required;

 - **Curtailment Records.** The specific requirements on utilities and States regarding curtailment records (what needs to be recorded, how that information will be stored, who can access it...); and

- Return to Normal Operations. The general agreement among the States relative to announcing an end to regional load curtailment and resuming normal utility operations.
- C. Return to Normal Operations. Once the shortage is alleviated, the States and utilities must bring closure to the curtailment process and effect a return to normal operations. The States will detail the process for utilities to follow. The nature of the actions to be taken will be influenced by the applicable stage of curtailment. At a minimum, the following types of activities need to occur: (1) The public must be informed that curtailment is no longer required; (2) Curtailment activities must officially cease as of the date that curtailment orders are lifted by the States. The States will provide utilities with guidelines to bring closure to curtailment activities such as: exemptions and appeals, penalty assessments, curtailment incentives (if any), and curtailment reports; and (3) State authorities will take whatever action is required to rescind any State orders for mandatory load curtailment.

SECTION VII. UTILITY LIABILITY AND FINANCIAL RELIEF

State law in each of the four Pacific Northwest States provides for waivers of, or exemptions from, liability in the case of utilities enforcing mandatory load curtailment ordered by the State. Individual consumer data will be treated as proprietary in accordance with standard utility practices and State law (identified in Plan Appendix F). If State law prohibits utilities from releasing consumer account information to the State, consumers seeking exemptions and/or adjustments shall expressly authorize such exchange. Utilities may seek financial relief for the extraordinary costs of curtailment using established channels, including utility rate case procedures and BPA power sales contract provisions.

SECTION VIII. ANNUAL REVIEW, POST-CURTAILMENT EVALUATION, AND UPDATE OF THE REGIONAL CURTAILMENT PLAN

At least once a year and after any curtailment, the Utility Coordinator will convene a meeting of all four State Contacts and interested utilities for the purpose of reviewing and updating the Plan and associated Appendices. Upon completion of the review, necessary changes will be made, a list of those changes prepared, and a revised plan issued. Changes will be noted in Appendix G.

SECTIONS IX AND X. APPENDICES AND RELATED CURTAILMENT INFORMATION

The following appendices are included in the Plan: (A) Regional Electric Energy Curtailment Analysis Model; (B) Curtailment Information; (C) Curtailment Measures; (D) Utility Curtailment Reports; (E) Contact Information Regarding the Utility Coordinator, State Contacts, and Utility Contacts; (F) State Statutes Citations and State Agencies; and (G) Annual Updates to the Plan. The following supplemental material is available under separate cover: (A) Individual State Plans and Summary of the Differences among the State Plans; (B) Utility Plans; and (C) State Statutes (copies of the actual statutory language).

Introduction

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INTRODUCTION

Purpose

The Emergency Operations Plan (EOP) has been created to provide Avista Utilities employees with information, support and policy guidance prior to, during, and following an unusual event involving the company's operations. Coordinated emergency response procedures are instrumental in effectively restoring customer services following accidents or natural disasters. This plan is designed to safeguard life and property and to provide for restoration of electric service in case of natural disasters, accidents, or civil disorder. Avista Utilities operates in a part of the country where large earthquakes, ice storms, volcanoes, floods and heavy snows are genuine statistical probabilities.

This document outlines guidelines for interdepartmental coordination to help expedite restoration efforts.

Objectives

- Provide general strategy for protection of life and efficient restoration of customer services.
- Provide policy guidance for restoration activities.
- Define interdepartmental coordination efforts during an unusual event.
- Define equipment, personnel and conditions required to open and maintain the Emergency Operating Plan.

Employee Responsibilities During An Emergency

In the event of a major emergency, the first responsibility of employees is the safety and welfare of themselves and their families. After these obligations have been discharged, all employees should be prepared to help in every practicable way to restore and maintain essential utility services of Avista Utilities.

Avista Utilities places the safety of its personnel and the general public above any other consideration. This is especially true during emergencies when field personnel work long hours and under unusual conditions. All employees should be alert to the increased accident potential of emergency work. Job steps should be carefully planned and safe work procedures consistently applied.

The Emergency Operations Plan is designed to improve on Avista Utilities strong reputation of employee response to emergencies. The EOP is designed to make the emergency restoration of electric service to our customers even more efficient. With the advent of the ICS, key employees will gather to evaluate contingencies and manage emergencies as they arise. As information is collected and disseminated from this central hub, Avista Utilities will, in turn, be able to effectively coordinate restoration efforts.

It is crucial that the responsibilities outlined within this plan be carried out or delegated only by those key employees to which these responsibilities have been assigned. This will eliminate duplication of duties and miscommunication between employees.

INCIDENT COMMAND SYSTEM

Incident Command System At Avista Utilities

The Incident Command System is being adopted by Avista Utilities as the basis for the Emergency Operating Plan. A primary concern to Avista Utilities is to use the same emergency response system now in use by the City and County. For Avista Utilities to be effective, we need to coordinate our efforts with outside agencies. If response personnel are not responding as part of an integrated emergency management system, effectiveness is reduced as is potential communication and coordination with other agencies that may respond to the scene.

The ICS has a number of components working together to provide the basis for an effective ICS operation.

- Common terminology
- Integrated communications
- Modular organization
- Manageable span of control
- Comprehensive resource management

Common Terminology/Integrated Communications

In addition to better outside communication and coordination, the ICS will also provide better internal communication and coordination for all Avista Utilities personnel involved in the emergency. This plan will provide useful information on the duties of each individual involved in the emergency and the reporting structure needed for better communication. Since everyone involved in the incident is using the same terminology, better communication results. A clear organized reporting structure also facilitates better communication.

Modular Organization/Manageable Span of Control

Another feature of the ICS is that the organizational structure is not based on the size or area of involvement but on the complexity of the incident. Normally, the ICS starts small and grows slowly as the incident expands. For a major incident that is an exception to the norm, the incident could grow rapidly as with a major storm or explosion. The ICS recognizes that there is no standard organizational structure for every incident but instead provides a method to develop the organizational structure required for the severity of each incident. The ICS will function equally well for day-to-day incidents as well as major incidents. The only difference being that in a major incident the organizational structure would continue to expand or contract as the incident changes. In all incidents the organizational structure is modified to limit the span of control for effective emergency response.

The ICS provides Avista Utilities with a system well proven by fire departments and police departments. Although outages or hazards on the Avista Utilities system may first appear different for those other agencies, the organizational structure to handle the incident would still be the same.

Comprehensive Resource Management

The ICS also allows better resource management by letting the crews and other field personal manage the incident at the appropriate level to handle the incident. The managing of the incident originates from the field personnel who provide the feedback through the Incident Command System. This will help direct the needed resources to where they can best be used.

The Incident Command System

Although many systems exist throughout the nation for the command and control of resources at emergency incidents, Avista Utilities has adopted the Incident Command System (ICS) as its base for the Emergency Operating Plan (EOP). This is consistent with the system adopted by the city and county of Spokane where Avista Utilities headquarters are located.

The ICS is recognized as a documented system that has been successfully used in managing available resources at emergency operations. The ICS was developed as a consequence of fires that consumed large portions of wild land, including structures, in Southern California in 1970. As a result of those fires, agencies saw the need to document a system that allowed them to work together toward a common goal in an effective and efficient manner.

The system consists of procedures for controlling personnel, facilities, equipment, and communications. It is designed to begin developing from the time an incident occurs until the requirement for emergency management and operations no longer exists. The "Incident Commander" is a title that can apply equally to a line foreman, or to the manager of a department, depending upon the situation. This structure of the ICS can be established and expanded depending upon the changing conditions of the incident.

As such, the system can be utilized for any type or size of emergency, ranging from a minor incident involving a single line crew, to a major emergency involving all Avista Utilities crews and outside crews. The ICS allows different agencies to communicate using common terminology and operating procedures. It also allows for the timely combining of resources during an emergency.

The ICS is designed to be used in response to emergencies caused by fires, floods, earthquakes, hurricanes, tornadoes, tidal waves, riots, hazardous materials, or other natural or human-caused incidents.

The ICS has five major functional areas: Command, Planning, Operations, Logistics, and Finance. The potential magnitude of the incident will require adequate staffing to maintain an effective span of control. These areas will grow or shrink in size depending on the nature of the incident. These areas will perform the following functions:

Command

- Assess the incident priorities.
- Develop appropriate organizational structure.
- Manage incident resources.
- Coordinate the overall emergency activities.

Planning

- Collect information regarding the incident and resources.
- Anticipate changing resource needs.
- Prepare alternate strategies and tactical options based on incident potential.

Operations

- Responsible for the direction and coordination of all tactical operations.

Logistics

- Provide facilities.
- Provide services.
- Provide materials.

Finance

- Responsible for tracking all incident costs and evaluating the financial considerations of the incident.

Note: An example of different organizational structures using the above functional areas is shown in the Level I, II, and III emergency procedures.

CLASSIFICATION AND DECLARATION OF EMERGENCY

Emergency incidents at Avista Utilities will be classified into three different levels depending on the severity of the emergency and the number of incidents involved.

Level I An incident or incidents requiring immediate action to prevent actual or potential loss, damage, or danger, but limited in scope to that of normal operations.

Example: Wind storm causes spot outages in Spokane. Spokane crews work into the night to restore affected customers.

Level II An incident or incidents requiring immediate action to prevent actual or potential loss, damage, or danger, but somewhat beyond the scope of normal operations. Event usually affects more than one construction area. Work force is usually shared between construction areas. Average restoration time is normally between 16 and 48 hours. Central Dispatch is still dispatching prioritized work to crews.

Example: Effective restoration after a heavy snowstorm in Coeur d'Alene/Kellogg area requires assistance from Spokane and Palouse area crews.

Level III A major incident requiring immediate action to prevent actual or potential loss, damage, or danger but of such magnitude that it is far beyond the scope of normal operations. This type of emergency requires extensive interdepartmental mobilization of personnel, materials, and equipment in addition to contract line and tree crews to restore normal operating conditions. Restoration time is normally more than 48 hours. Central Dispatch is not dispatching crews but is still assigning the clearances.

Example: Every available Avista Utilities crew is working to restore the Spokane/Coeur d'Alene area after a harsh ice storm. Additional resources are needed to effectively manage the situation.

EMERGENCY PROCEDURES FOR LEVEL I, II & III CLASSIFICATIONS

The material in this section has been included in order to show how a Level I incident eventually develops into a Level III incident. The procedures in the beginning show how Spokane's Central Dispatch office coordinates emergency in the Spokane area and in the company's other construction areas. The procedures toward the end show how the Incident Commander creates the organizational structure to handle a Level III event.

Note: Some steps between each level repeat themselves. This is to ensure certain procedures are not overlooked if an event can be immediately classified as a Level II instead of a Level I.

Incident Command System Personnel List

Level I	level II	Level III
	Incident Commander	
Central Dispatcher Supervisor on Call	Harold Wilkinson Greg Gfeller Steve Plewman Steve Hadley Rich Garcia	Greg Gefeller Al Fisher Randy Cloward Bob Fallis
	Electric Operations Chief	
Central Dispatcher Supervisor on Call	Steve Plewman Rich Garcia Harold Wilkinson Greg Gfeller Steve Hadley Pat Sprute Art Dorval	Greg Gefeller Steve Plewman Rich Garcia Harold Wilkinson Steve Hadley Pat Sprute Art Dorval
	Planning Chief	
Central Dispatcher Supervisor on Call	Harold Wilkinson Steve Hadley Greg Gfeller Randy Cloward Bob Fallis Steve Plewman* Patty Shea*	Harold Wilkinson Steve Hadley Greg Gfeller Randy Cloward Bob Fallis Steve Plewman* Patty Shea*
	* with additional experience and training	
	Assessment Coordinator	
Central Dispatcher Supervisor on Call	Doug Kyle Leonard Klein Frank Meland Steve Hadley Harold Wilkinson Cheryl Hunter Tim Mair Art Dorval Bob Rew	Doug Kyle Leonard Klein Frank Meland Steve Hadley Harold Wilkinson Cheryl Hunter Tim Mair Art Dorval Bob Rew

Level I – Normal Operations-Avg. restoration less than 16 hours

- 1) Central Dispatch assumes the role of Incident Commander and coordinates the outage restoration.
- 2) If the incident continues to escalate then the Central Dispatcher contacts the Spokane Supervisor On-Call with the following data for evaluation regardless of time of day/night:
 - Type of storm/cause of outage
 - Severity and anticipated length of outages
 - Backlog/customer calls on hold
 - Amount of personnel needed

After normal working hours, when any outside office is also severely affected by the storm/outage, the Central Dispatcher will contact the appropriate (outside office) Supervisor On-Call with the data above and any other information pertinent to the area affected.

- 3) At this point, the Central Dispatcher and outside Supervisor On-Call will determine the need to open the affected outside office to handle customer calls and/or arrange for call out and dispatching of field personnel.
- 4) If necessary, the Central Dispatcher and/or the Spokane Supervisor On-Call will make calls to ensure adequate human resources for the following positions:
 - Assistance for the Central Dispatcher
 - Sorters
 - Line personnel
 - Forestry personnel

5) Upon arrival, all field crew personnel are to report in to the Central Dispatcher and await work direction in the dock break room. It is the responsibility of the Central Dispatcher to provide work direction to all field personnel in a Level I incident.

6) The Assistant to the Central Dispatcher and the Sorters will report in to the Central Dispatcher and immediately assume their duties.

7) The Service Dispatcher will contact the Customer Service Manager by calling pager ~~484-0184~~ 839-430. The Customer Service Manager will return the call at 838-4572. That is the emergency phone at the Service Dispatcher's desk.

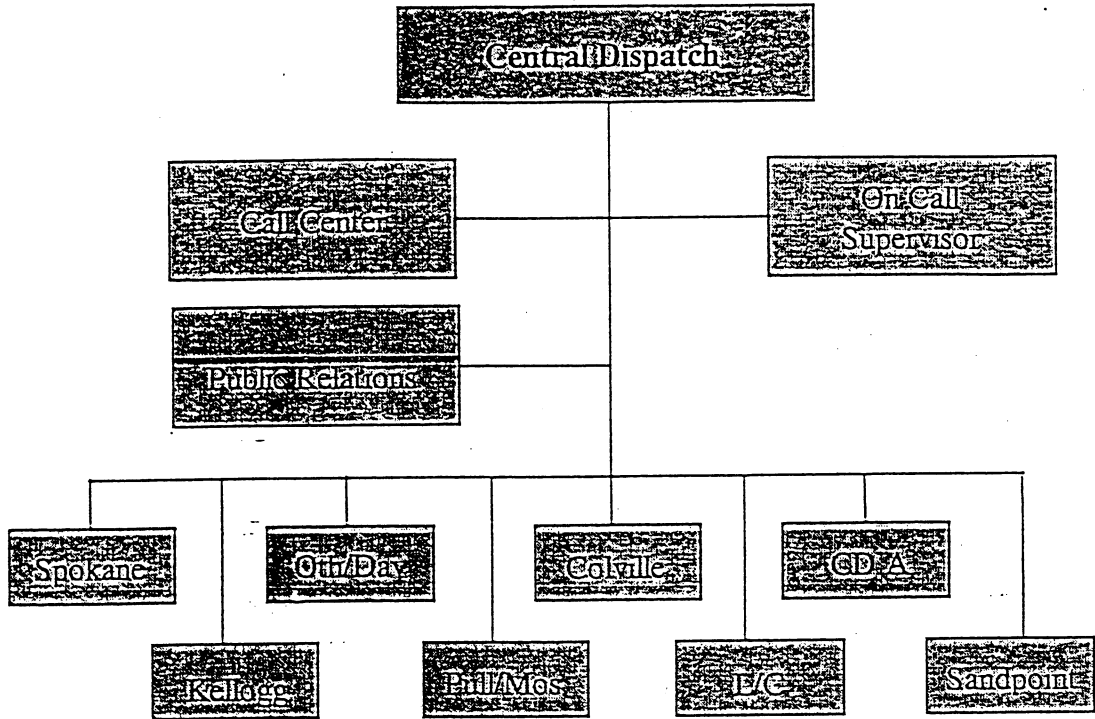
The Customer Service Manager will call in the appropriate number of Call Center representatives to handle the incoming calls based on data provided by the Service Dispatcher. If two or less is requested, they are to report to the Dispatch Center. If more are needed, they should report to the Call Center.

The Service Dispatcher will assume the duties of Call Center Coordinator, designating one representative as Gas Dispatcher, if necessary.

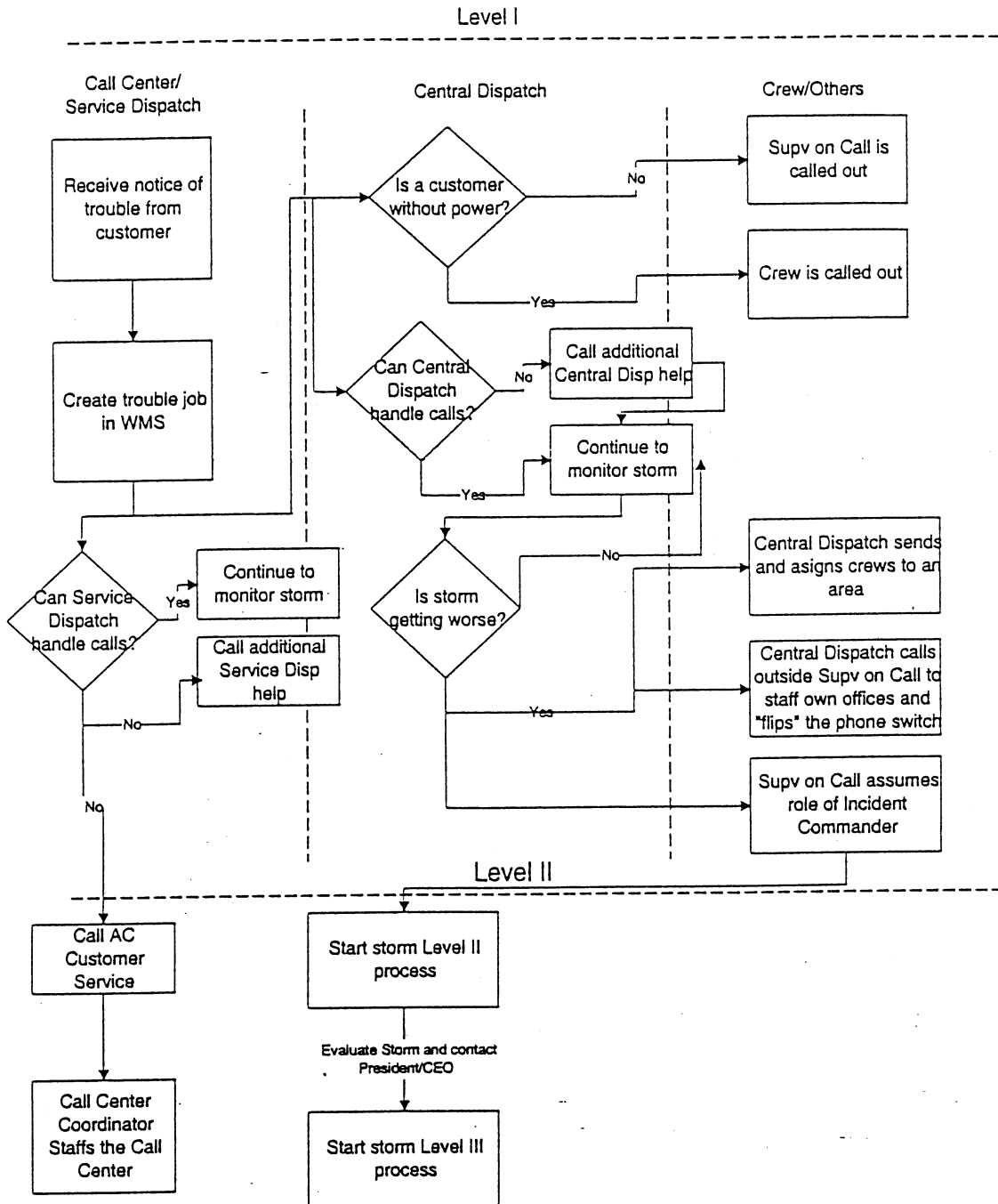
Avista Utilities Emergency Operating Plan

- 8) The Supervisor On-Call and the Customer Service Manager will remain available or provide an alternate contact to the dispatchers should additional assistance be necessary.
- 9) If total restoration cannot be achieved with this level of resources, proceed to Level II procedures.

Level I



EOP Progression From Level I to Levels II, III

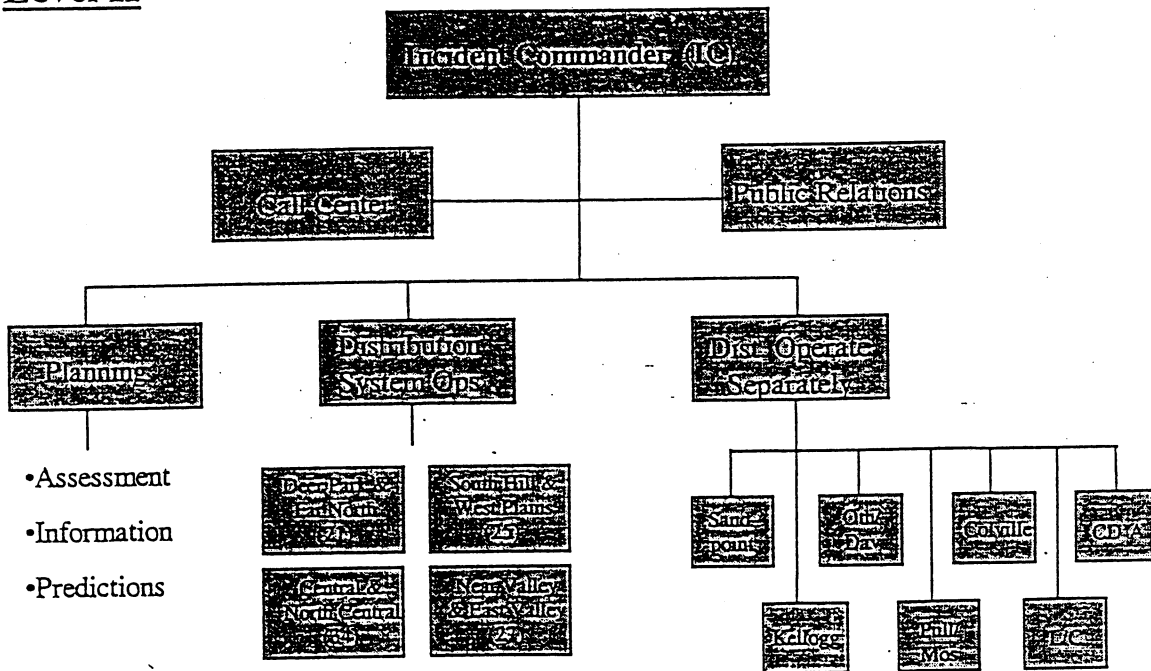


Level II – Average restoration time is between 16 and 48 hours

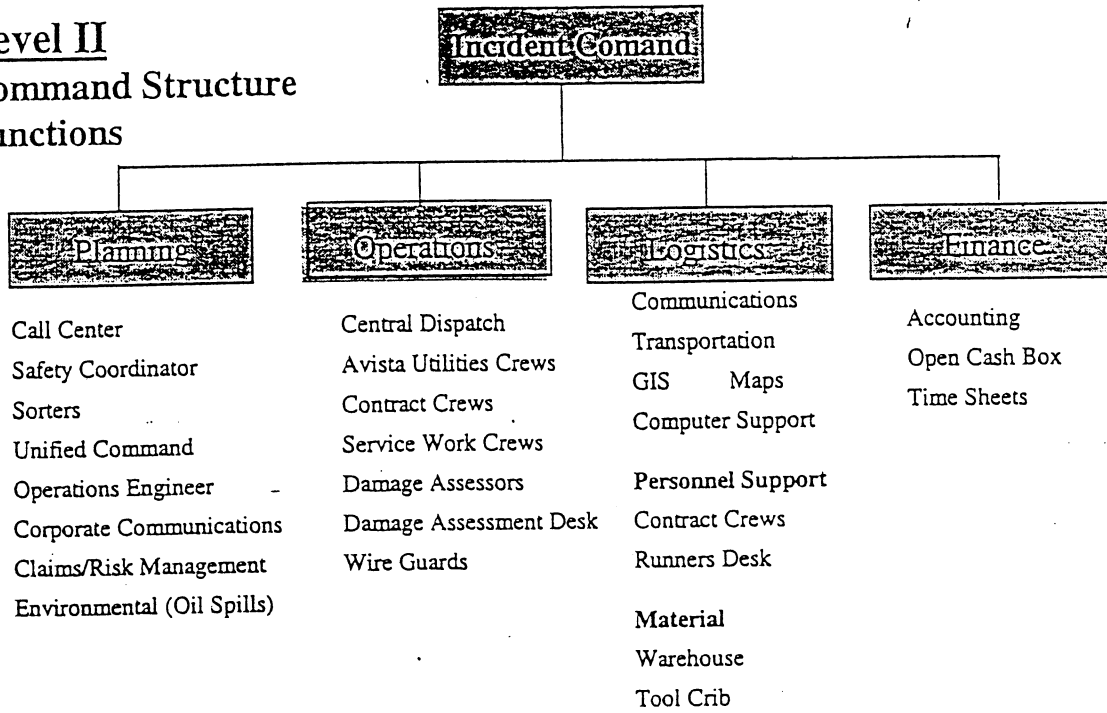
- 1) After the briefing by the Central Dispatcher, or upon arrival to the Dispatch Center, the Spokane Supervisor On-Call will assume the duties of Incident Commander. The Incident Commander will then assess the outage situation with the Central Dispatcher. It is the responsibility of the Incident Commander and the Central Dispatcher to continually assess outage status and reclassify the emergency as necessary.
- 2) The outlying area Supervisor On-Call will become the Incident Commander for that area.
- 3) The Incident Commander will:
 - Assess the incident priorities
 - Develop the incident command structure appropriate for the incident
 - Assess resource needs and will start recruiting the personnel needed for the incident command structure.
- 4) Every storm or emergency will be different. As the emergency situation continues to escalate/decrease, the Incident Commander (considering input from all areas) will add/scale back personnel and resources.
- 5) The Incident Commander will assess the situation to determine what resources are needed for Planning, Logistics, Operation, and Finance. (See Level III for a detailed list of these functions)

If total restoration cannot be achieved in a reasonable time frame while using all of Avista Utilities operational resources, a Level III emergency should be declared.

Level II



Level II
Command Structure
Functions



Level III – Average restoration time is over 48 hours

1. After the briefing by the Central Dispatcher, or upon arrival to the Dispatch Center, the Spokane Supervisor On-Call will assume the duties of Incident Commander. The Incident Commander will then assess the outage situation with the Central Dispatcher. It is the responsibility of the Incident Commander and the Central Dispatcher to continually assess outage status and reclassify the emergency as necessary. The Incident Commander will change the command structure to provide sufficient resources to handle the Level III incident.
2. As the incident becomes more complex, fielders and planners will be added for assistance. The foreman may be assigned responsibility for all the feeders out of a substation or out of several substations. The foreman in this instance becomes a local Incident Commander to direct the work for his crew and for any contract crews working out of the substations he is assigned.
3. The job of the planner is to gather and report information on the feeder and substation status back to the Planning Coordinator or Planning Chief. The Substation Coordinator will direct the resources needed at the different substations.
4. The command structure may include some or all of the following personnel:

Command

- Incident Commander
- Administrative Coordinator
- Additional Staff as required

Planning

- Planning Chief
- Damage Assessment Coordinator
- Safety Coordinator
- Damage Assessors
- Wire Guards
- Damage Assessment Desk
- Sorters
- Call Center Coordinator
- Corporate Communications Coordinator
- Public Emergency Coordinator
- System Operators/Transmission Coordinator
- Information Technology Specialist (Support Maps/Sorting/Outage Analysis)
- Operations Engineer
- Environmental Compliance Specialist
- Marketing Coordinator

Operations

- Electric Operations Chief
- Central Dispatch
- Substation Coordinators
- Avista Utilities Crews
- Forestry Coordinator

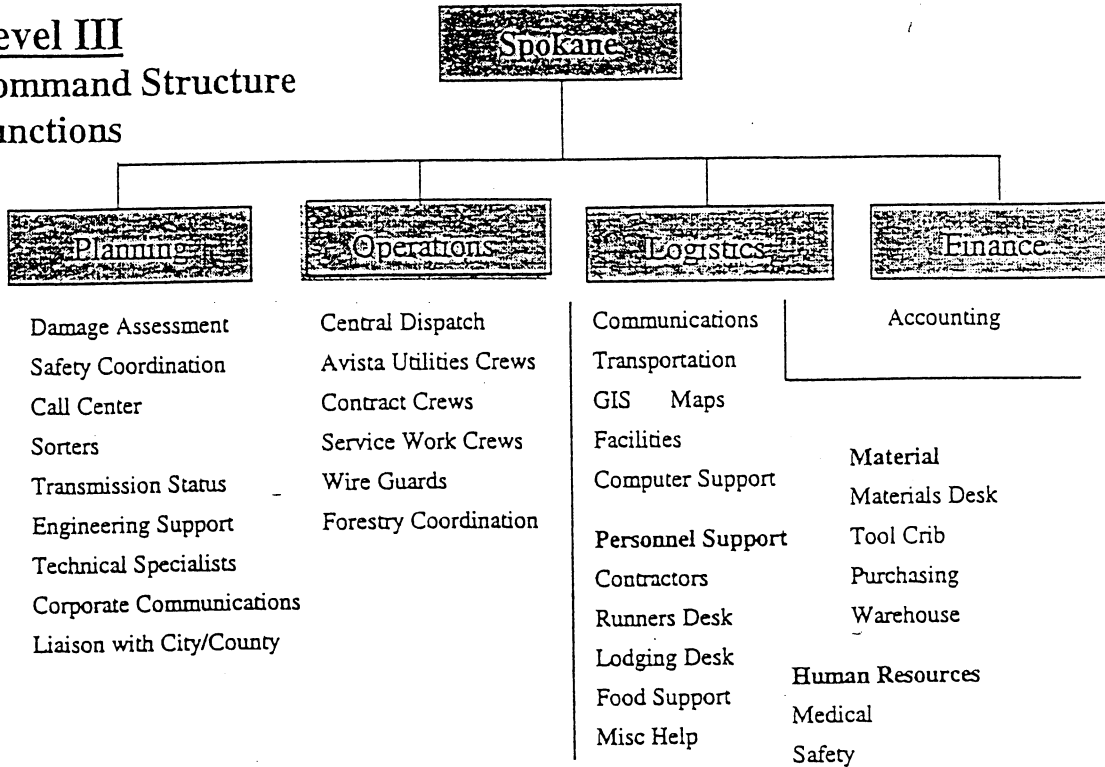
Logistics

- Logistics Chief
- Communication Coordinator
- Human Resources Coordinator
- Public Safety Coordinator
- Occupational Safety and Health Coordinator
- Risk Management Coordinator
- Material/Purchasing Coordinator
- Contract Crew Coordinator
- Lodging Desk
- Food
- Transportation
- Meter Reading
- Facilities
- Information Systems Coordinator

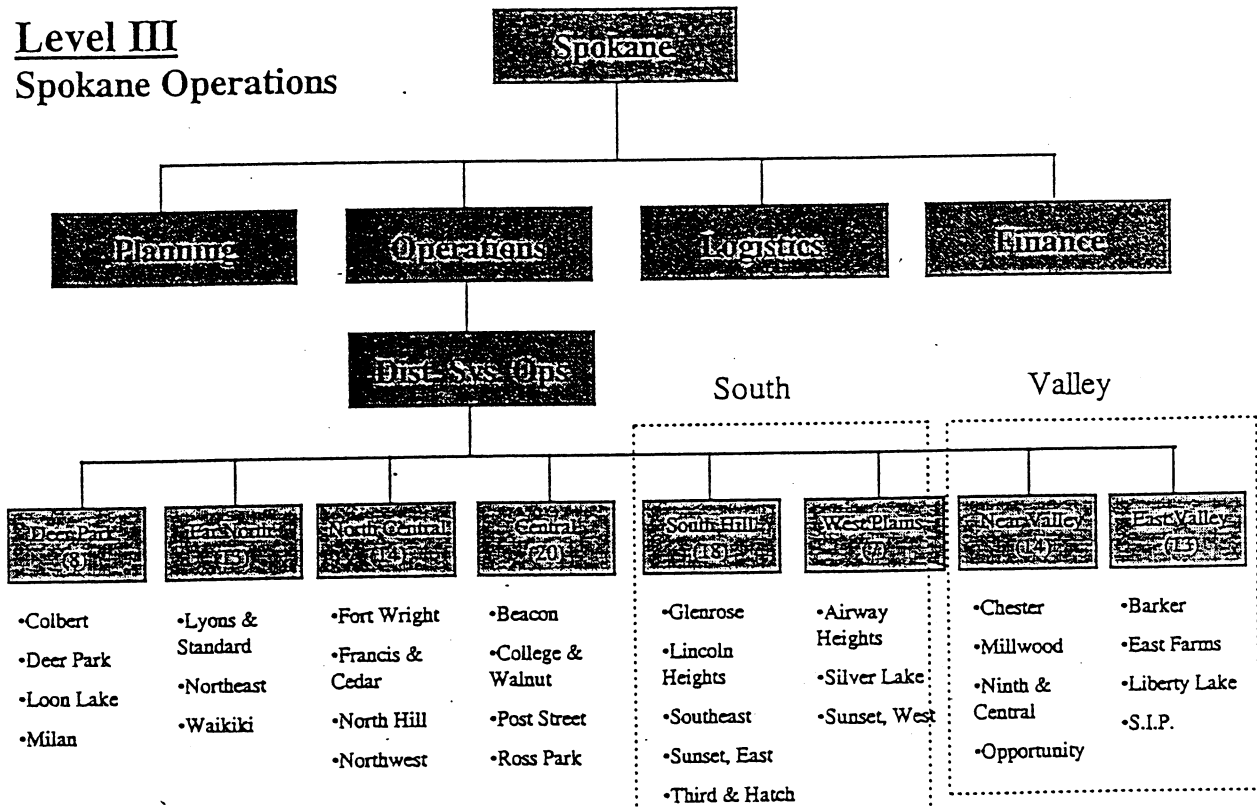
Finance

- Finance Chief

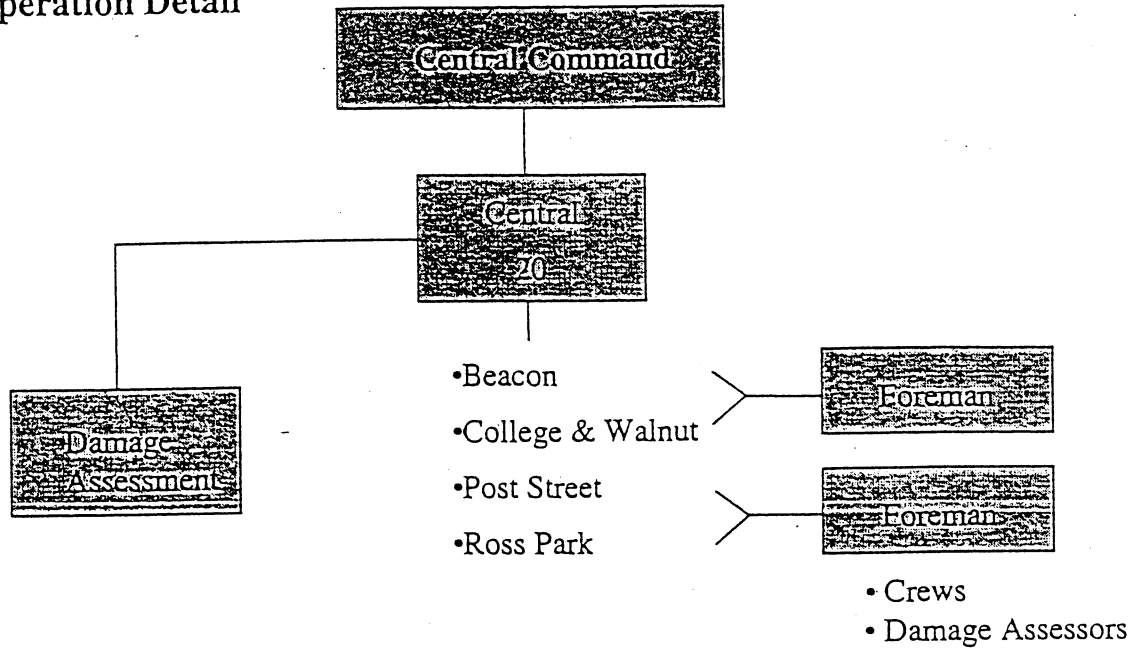
**Level III
Command Structure
Functions**



**Level III
Spokane Operations**



Level III
Operation Detail



ESSENTIAL SERVICES/AREA MANAGERS

At the direction of the Primary Decision Maker, Area Managers or their designee will facilitate the flow of information and coordinate necessary activities with local essential services providers.



Avista Utilities
1411 E Mission
Spokane, WA 99220
Phone number line
Fax number line
www.avistautilities.com

DRAFT

August 7, 2000

AVISTA UTILITIES CALL FOR ENERGY CONSERVATION Power Demand High Due to _____

(Spokane, WA) Due to _____

Avista Utilities urges customers to watch their energy consumption and curtail their use of electricity whenever possible.

With high expected to reach _____ degrees, air conditioners are expected to create a heavy demand for electricity. The peak demand on the Avista system is expected to climb to _____ megawatts by _____. The record peak was _____ Megawatts on _____.

Recently, the rising demand for electricity and unusually high temperatures have left customers wondering if their electric needs can be met. By providing updates on system conditions and peak demand forecasts, Avista Utilities hopes to convey the importance of using electricity wisely on days when electricity reserves may run low.

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Spokane, WA 99220
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www.avistautilities.com



DRAFT

August 7, 2000

CONTINUED CONSERVATION EFFORTS ENCOURAGED BY AVISTA Stage One Electrical Emergency Issued

(Spokane, WA) Avista Utilities is calling a Stage One emergency at _____, asking electric customers to continue their conservation efforts. Electricity continues to be in short supply throughout the western region of the United States.

Customers throughout the Inland Northwest are being asked to voluntarily reduce their use of electricity today, especially during the peak hours between 12 noon and 7 PM to prevent more severe curtailment measures. Peak demand on the Avista transmission system is expected to reach _____ megawatts by _____.

Stage One of Avista's Electrical Emergency Plan is initiated to advise customers of potential power shortages and to ask all customers to conserve electricity to ensure there will be enough power to meet future demand. The request for demand reduction is not intended to disrupt employment or curtail industrial production or commerce. However, if the conservation measures are insufficient in lowering the demand for power, load management programs that implement voluntary curtailments of power are probable.

Avista Utilities
1411 E Mission
Spokane, WA 99220
Phone number line
Fax number line
www.avistautilities.com



DRAFT

August 7, 2000

AVISTA DECLARES A STAGE TWO ELECTRICAL EMERGENCY Voluntary Curtailment Programs Are Activated

A Stage Two emergency was declared by Avista Utilities from _____, today, _____, due to a loss of _____ megawatts caused by _____ at a _____ generator.

Avista Utilities will make every effort to maintain stability of the transmission system while initiating the voluntary curtailment programs. However, Avista may implement involuntary curtailment if reserves dip to lower levels.

A Stage One emergency, urging customers to conserve as much energy as possible was called at _____.

Peak demand on the electrical grid is expected to reach _____ megawatts by _____. As continued _____ conditions affect the Western U.S., Avista expects to see unusually high demand for electricity to keep homes and businesses cool.

A Stage Two emergency is declared when operating reserves dip below _____ or are expected to within the next two hours.

POWER CURTAILMENT

CENTRAL DISPATCH RESPONSIBILITIES

During regular work hours

Central dispatch is notified that feeders will be opened by feeder groups.

- Verify feeder groups to be opened & length of outage.
- Notify John McClain.
- Notify crews working on feeders that will be affected.
- Recruit crew & servicemen for standby for when feeders are closed back in.
- Prepare outage messages for contact center.
- Be prepared for possibility of public accident with Avista facilities during outage.
- Co-ordinate restoration of feeders with S.O. i.e. what was loading before feeder was opened, do we need to open @ mid point to allow for cold load pick up etc.

During non-regular hours

Central dispatch is notified that feeders will be opened by feeder groups.

- Verify feeder groups to be opened & length of outage.
- Call in additional central dispatchers.
- Notify SOC in the districts involved.
- Call out a service crew for each district affected & two service crews for Spokane.
- Prepare outage messages for contact center.
- Be prepared for possibility of public accident with Avista facilities during outage.
- Co-ordinate restoration of feeders with S.O. i.e. what was loading before feeder was opened, do we need to open @ mid point to allow for cold load pick up etc.

Dick Sayman 7/25/00



*Interoffice Memorandum
Spokane Operations*

DATE: 6/29/00
TO: File
SUBJECT: Rolling Blackout Procedures

Should a Rolling Blackout condition exist, please keep the following in mind:

- The Outage Coordination and Communication Plan will be activated showing what steps to take at each level of the Load Curtailment Emergency. The EOP plan will be in effect and have priority over all plans during rolling blackouts.
- The length of the Rolling Blackout will be approximately 30 minutes. It is believed that a longer duration will increase chances of Cold Load Pick-up and shorter durations may not be practical for restoration.
- System Operators will follow NERC Energy Emergency Alert Levels (See Below). NERC defines an "Energy Emergency" as "A condition when a system or power pool does not have adequate energy resources to provide its customers' expected energy requirements"
- Rolling Blackouts will occur throughout the Avista Service Area. Feeders have been grouped together with 6 feeders per group. The lowest priority feeders (least amount of Essential Services) are in the first groups. It is estimated that there will be 25 MW per group with 16 groups shown (400 MW total). In each group, there are 3 feeders from Spokane, 1 feeder from CDA, and 2 feeders from outside areas. All the feeders selected are SCADA feeders so they can be opened and closed remotely.
- The number of groups taken out will depend on the amount of load Avista needs to shed. The System Operators will determine the number of feeder groups to open to satisfy load requirements. The next groups will be opened before the first groups are closed back in. We will rotate through each of the groups on a rolling basis until the load no longer needs to be curtailed. Cold load pickup procedures will be initiated as required. System Operators will create a SCADA screen to help monitor and list the feeders to open during a rolling blackout.
- Under-frequency load shedding will also take place with existing relays in place. This could occur when sudden changes happen on the system and there is no time to implement the manual Rolling Blackout Procedures. Should this occur, System operators can start implementing the Rolling Blackout Procedures as needed. A table for the Avista Under-Frequency Load Shedding is attached.

NERC Energy Emergency Alert Levels (Summary)

Alert 1 – All available resources in use

- Conditions where all available resources are committed to meet firm load, firm transactions, and reserve commitments.
- Non-Firm energy sales have been curtailed

Alert 2 – Load management procedures in effect

- Foresees or has implemented procedures up to but excluding interruption of firm load commitments. These procedures may include:
 - Public appeals to reduce demand
 - Voltage reduction
 - Interruption of non-firm retail loads
 - Demand-side management
 - Utility load conservation measures
- Before declaring an Alert 3, All available resources must be in use. This includes but is not limited to:
 - All generation units available are on line, regardless of cost
 - Purchases made regardless of cost
 - Non-firm sales recalled and interruptible loads curtailed
 - Operating reserves are being utilized below the required minimum.

Alert 3 – Firm load interruption imminent or in progress

- Load shedding will take place

Alert 0 – Termination

- Notify that Energy Emergency Alert has ended

FEEDER GROUPS FOR BLACKOUTS

Feeder	Grouping	Area	Notes
DALTON 133	A	CDA	
POUNDLN 1202	A	L/C	
BEACON 12F3	A	SPO	
CHESTER 12F4	A	SPO	
SOUTHEAST 12F1	A	SPO	
SUNSET 12F3	A	SPO	
C'DALENE 123	B	CDA	
MOSCOW 512	B	PALOUSE	
F&C 12F2	B	SPO	
GLENROSE 12F2	B	SPO	
ROSS PARK 12F1	B	SPO	
SUNSET 12F1	B	SPO	
POSTFALL 213	C	CDA	
10TH STW 1254	C	L/C	
SPULLMAN 121	C	PALOUSE	
C & W 12F5	C	SPO	
MILLWOOD 12F2	C	SPO	
NORTHWEST 12F3	C	SPO	
DALTON 132	D	CDA	
LOLO 1266	D	L/C	
FORT WRIGHT 12F2	D	SPO	
L&S 12F3	D	SPO	
LIBERTY LAKE 12F3	D	SPO	
SIP 12F4	D	SPO	
HUETTER 141	E	CDA	
SLEWISTN 1348	E	L/C	
MOSCOW 515	E	PALOUSE	
EAST FARMS 12F2	E	SPO	
F&C 12F6	E	SPO	
FORT WRIGHT 12F1	E	SPO	
C'DALENE 122	F	CDA	
SLEWISTN 1358	F	L/C	
PULLMAN 112	F	PALOUSE	
COLBERT 12F1	F	SPO	
F&C 12F5	F	SPO	
L&S 12F2	F	SPO	
APPLEWAY 112	G	CDA	
SLEWISTN 1368	G	L/C	
MOSCOW 514	G	PALOUSE	
CHESTER 12F3	G	SPO	
F&C 12F4	G	SPO	
LIBERTY LAKE 12F1	G	SPO	
POSTFALL 212	H	CDA	
HOLBROOK 1205	H	L/C	
PULLMAN 117	H	PALOUSE	
CHESTER 12F1	H	SPO	
EAST FARMS 12F1	H	SPO	
F&C 12F3	H	SPO	
COLVILLE 12F2	I	BIGBEND	
PLESNTVW 241	I	CDA	
SPULLMAN 124	I	PALOUSE	Power to WSU East campus sub
9TH & CENTRAL 12F3	I	SPO	Synders Bakery
BARKER ROAD 12F2	I	SPO	
CHESTER 12F2	I	SPO	
COLVILLE 12F4	J	BIGBEND	
DALTON 131	J	CDA	
HOLBROOK 1207	J	L/C	
9TH & CENTRAL 12F4	J	SPO	
BARKER ROAD 12F3	J	SPO	
BEACON 12F6	J	SPO	Fairgrounds
C'DALENE 124	K	CDA	
10TH STW 1256	K	L/C	
DOVER 4S21	K	SANDPOINT	
C & W 12F2	K	SPO	

30 Minute Outage per group
 Groups are sorted from least critical to most critical
 6 feeders per group
 25 MW per group
 Essential Service Feeders avoided
 47 Feeder from Spokane
 18 Feeders from CDA
 4 Feeders from Big Bend
 13 Feeders from L/C
 10 Feeders from Palouse
 2 Feeders from Sandpoint

FEEDER GROUPS FOR BLACKOUTS

Feeder	Grouping	Area	Notes
NORTHWEST 12F1	K	SPO	Landfill
ROSS PARK 12F5	K	SPO	
APPLEWAY 111	L	CDA	
10TH STW 1257	L	L/C	
POUNDLN 1203	L	L/C	
9TH & CENTRAL 12F2	L	SPO	
C & W 12F1	L	SPO	
ROSS PARK 12F4	L	SPO	
LEE REYN 511	M	BIGBEND	
DALTON 134	M	CDA	
POUNDLN 1204	M	L/C	
BEACON 12F5	M	SPO	
L&S 12F4	M	SPO	Darigold
OPPORTUNITY 12F1	M	SPO	Valley Mall
C'DALENE 125	N	CDA	
HUETTER 142	N	CDA	
MOSCOW 511	N	PALOUSE	Primary feed to University of Idaho
PULLMAN 113	N	PALOUSE	Remaining parts of downtown commercial
BEACON 12F1	N	SPO	Felts Field
LIBERTY LAKE 12F4	N	SPO	
KETTLEFL 12F1	O	BIGBEND	
POSTFALL 211	O	CDA	
SLEWISTN 1316	O	L/C	
9TH & CENTRAL 12F1	O	SPO	
FORT WRIGHT 12F4	O	SPO	Fairchild Water, SFCC
ROSS PARK 12F2	O	SPO	Gonzaga
APPLEWAY 113	P	CDA	
Rathdrum 231	P	CDA	
SPULLMAN 122	P	PALOUSE	WSU core Science, Communications, Mathematics, and Theatre buildings
URBAN 4S30	P	SANDPOINT	
3&H 12F5	P	SPO	
Silver Lake 12F3	P	SPO	



*Interoffice Memorandum
Spokane Operations*

DATE: 2/15/1999
TO: Central Dispatch
FROM: John McClain, Spokane Operations Engineer
SUBJECT: Cold Load Pickup Policy for Urban 500 Amp Feeders

Cold Load Pickup is defined as the load on a feeder after restoration of service in which some or most of the load diversity has been lost after a sustained outage. A sustained outage would be defined as any outage lasting longer than 5 minutes. When this occurs, the load diversity of the feeder changes since motors, electric heat, etc. will all want to operate at the same time.

The effect of the load starting at the same time will cause the feeder load to increase from 100% of load at the time of the outage to several times normal in the first few cycles to perhaps 1.5 to 2 times normal after several minutes or even hours. Load on the feeder will slowly drop off until it is again back to the nominal 100% load value. The time needed to return to the 100% load value would vary but may last up to an hour or longer.

When a Cold Load Pickup condition occurs, such as when a feeder has been out for a sustained period of time, certain switching practices should be followed to successfully re-energize the feeder. If these practices are not followed, the feeder may trip on overload or equipment may fail due to the excessive load.

The relay settings for our urban 13 kV feeders are typically set to operate as a nominal 500 amp feeder. The pickup of the phase overcurrent relays is normally set about 960 amps. This setting will allow about twice the normal peak load (500 amps) to pickup feeder cold load. The feeder will also carry an emergency peak load of 750 amps.

The following page has some instructions to properly energize a feeder when cold load is expected. Cold Load would be common in the winter during the heating season and during the summer when air conditioning is used. Loading of 350 amps prior to the outage is used to determine the type of switching needed. This loading value was chosen since expected cold load could be twice the load prior to the outage. When a feeder is energized in a cold load pickup situation we would like the cold load amps to be less than the emergency peak load value for the feeder of 750 amps.

Cold Load Pickup Instructions

- Have a switchman stand-by for any needed switching on the feeder.
- Change tripping on the breaker to block instantaneous tripping and to block reclosing.
- Check on SCADA what the load was on the feeder PRIOR to the outage. If SCADA is not available than estimate the loading on the feeder.

Lock Regulators on Neutral

- 350 amps or less feeder load prior to the outage:
 - Energize the feeder with the substation feeder breaker.
 - Check feeder load to ensure it remains less than 750 amps.
 - If the load is above 750 amps the feeder must be de-energized and energized as described below.
- Feeder load is greater than 350 amps prior to the outage:
 - Open a midline switch to sectionalize the feeder load.
 - Energize the feeder to the open switch.
 - Check feeder load to ensure it remains under 750 amps
 - Monitor the load until it has dropped sufficiently to energize the remainder of the feeder by closing the open switch.