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IDAHO PUBLIC
UTILITIES COMMISSION



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December 23, 2021

ELECTRONICALLY FILED

Jan Noriyuki, Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg 8,
Suite 201-A (83714)
PO Box 83720
Boise, Idaho 83720-0074

Re: Case No. IPC-E-21-13, Application for Approval of Its Load Curtailment and Interruption Plan
Compliance Filing – Electric Service Rule J, Continuity, Curtailment and Interruption of Electric Service

Dear Ms. Noriyuki:

Idaho Power Company hereby submits the enclosed compliance filing in the above-captioned proceeding pursuant to Idaho Public Utilities Commission Order No. 35263, which includes its electric service Rule J as listed below, reflecting the modifications to Electric Service to incorporate the updated Load Curtailment and Interruption Plan with an effective date of December 20, 2021.

First Revised Sheet No. J-1 Cancelling Original Sheet No. J-1
Original Sheet No. J-2
Original Sheet No. J-3
Original Sheet No. J-4

If you have any questions regarding this filing, please contact me at (208) 388-5994 or caschenbrenner@idahopower.com.

Very truly yours,

A handwritten signature in blue ink that reads "Connie Aschenbrenner".

Connie Aschenbrenner

CA/sg
Enclosure

RULE J
CONTINUITY, CURTAILMENT AND
INTERRUPTION OF ELECTRIC
SERVICE

1. Electric Service is inherently subject to occasional interruption, suspension, curtailment, and fluctuation. The Company will 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 the 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 the 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 the Company's system is interconnected, and acts or omissions of third parties;

b. Repair, maintenance, improvement, renewal or replacement work on the Company's electrical system, which work in the sole judgment of the Company is necessary or prudent; to the extent practicable work shall be done at such time as will minimize inconvenience to the Customer and, whenever practicable, the Customer shall be given reasonable notice of such work;

c. Actions taken by the Company, which in its sole judgment are necessary or prudent to protect the performance, integrity, reliability or stability of the Company's electrical system or any electrical system with which it is inter-connected, which actions may occur automatically or manually.

2. The provisions of this rule do not affect any person's rights in tort.

3. Load curtailment and interruption carried out in compliance with an order by governmental authority shall follow the Company's plan entitled "Load Curtailment and Interruption Plan", as outlined below.

RULE J
CONTINUITY, CURTAILMENT AND
INTERRUPTION OF ELECTRIC
SERVICE

LOAD CURTAILMENT AND INTERRUPTION PLAN:**OVERVIEW**

1. The Company will comply with all state and federal mandates to curtail the electric energy used by its Customers to prevent an electrical system collapse. Events that may trigger load curtailment, either upon notice from state agencies, the Regional Reliability Coordinator, or at the discretion of the Company, include but are not limited to:

- a. Fire, flood, drought, winds, generation failures, lack of sufficient generating capacity, equipment failures, governmental authority,
- b. Actions taken to protect the performance, integrity, reliability or stability of the Company's electrical system or any electrical system to which it is interconnected, which actions may occur automatically or manually,
- c. Actions taken by the Company that in its sole judgment are necessary or prudent for the safety of people and/or equipment, or
- d. Cyber-attacks or software failure of any part of the Company's generation, transmission, and/or distribution system protection and/or control systems.

2. Load curtailment can last for a short amount of time, but also could last for hours or even days.

AUTOMATIC, REMOTE AND MANUAL ACTIONS

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

2. Where Supervisory Control and Data Acquisition (SCADA) equipment is installed, the Company will remotely control switches, circuit breakers, relays, voltage regulators or other equipment. In areas where no SCADA equipment is installed, actions are performed manually by on-site field personnel.

3. If actions are undertaken, then to the extent permitted by the operating characteristics of the electrical system, the Company will perform such actions so that interruption, curtailment, or fluctuation of service to customers will be accomplished sequentially, unless it is necessary in the sole judgment of the Company, or if required by the Regional Reliability Coordinator to vary said sequence in order to protect system performance, integrity, reliability or stability.

RULE J
CONTINUITY, CURTAILMENT AND
INTERRUPTION OF ELECTRIC
SERVICE

CURTAILMENT AND INTERRUPTION

1. Curtailment and/or interruption of electric service can occur at any time for a multitude of situations. When these situations arise, Idaho Power intends to take appropriate actions to mitigate the situation for reliability while maintaining service continuity to as many customers as practical. Depending on the nature of the situation, mitigation actions will range from actions that will not affect Customers to actions that curtail and/or interrupt service, impacting localized areas and/or the entire Idaho Power service area.

2. Idaho Power will promptly notify and keep state regulatory and reliability authorities informed of the curtailment and/or interruption to electric service.

ROTATING OUTAGES AND ONGOING CURTAILMENT

1. Curtailment and/or interruption of Customer load may be necessary to maintain the reliability of the electric system in certain situations. In the event Idaho Power must curtail or interrupt Customer load for any reason, the Company's intent is to curtail the appropriate amount of load necessary to mitigate the situation. This is accomplished by selecting the amount or percent of load reduction needed in the Energy Management System (EMS) Load Shedding application. The EMS Load Shedding application allows the operator to select the applicable localized area or necessary portions of the Company's service area to curtail the load. Load curtailment is accomplished manually in areas that do not have SCADA connected to the EMS.

2. A range of curtailment stages associated with increasing levels of energy deficiencies has been developed, incorporating North American Electric Reliability Corporation (NERC) standards. The circumstances necessitating a reduction in the consumption of electricity in the short term will normally require that immediate emergency action is taken and as such there may be little or no warning. Sudden equipment outages or loss of generation could potentially lead directly to any curtailment stage without prior notice or progression of the stages described below. These stages align with the severity of the energy deficiency and are intended to minimize customer impact.

RULE J
CONTINUITY, CURTAILMENT AND
INTERRUPTION OF ELECTRIC
SERVICE

ROTATING OUTAGES AND ONGOING CURTAILMENT (Continued)

Stage	Nature	Type of Curtailment
1	All generation resources are committed. Firm Customer load, firm transactions, and reserve commitments are met. Concerned about sustaining required Contingency Reserves	<ul style="list-style-type: none"> • Non-firm wholesale energy sales • Ask Customers to voluntarily take conservation measures • Issue communications notifying employees of the situation and asking Company departments to reduce internal utility energy use.
2	Idaho Power is no longer able to provide expected energy requirements	<ul style="list-style-type: none"> • Curtailment actions listed in Stage 1 • Interruptible Customer load and available demand response programs • Issue communications requesting government agencies to implement their programs to achieve necessary energy reductions
3	Idaho Power is unable to meet minimum Contingency Reserves as required by NERC Standards	<ul style="list-style-type: none"> • Curtailment actions listed in Stage 1 and Stage 2 • Implement Emergency Load Shed and Block Rotation
4	Emergency Load Shed due to immediate risk posed to electrical reliability.	<ul style="list-style-type: none"> • Applicable to all Customers. May be limited to a specific location if reliability risk is local to an area.

3. Demand response programs, if deployed as a required action under this plan, will not be operated under the provisions of Schedules 23, 81, and 82. The provisions of Schedules 23, 81, and 82, including but not limited to operating hours, notification requirements, and incentive payments will not apply for any time period that the Company utilizes a Load Control Device installed under the programs to interrupt a participating customer's load for an electric system emergency.

RETURN TO SERVICE

Idaho Power will return service to its Customers when:

- The Company can meet its load and required operating reserves.
- The reliability of the electric system will not be jeopardized.
- Reliability Coordinator approval has been received, if applicable.