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IDAHO PUBLIC
UTILITIES COMMISSION

LISA D. NORDSTROM
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October 6, 2021

VIA ELECTRONIC FILING

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
In the Matter of Idaho Power Company's Application for Approval of Its Load
Curtailment and Interruption Plan

Dear Ms. Noriyuki:

Enclosed for electronic filing, pursuant to Order No. 35058, please find Idaho
Power Company's Reply Comments.

If you have any questions about the attached document, please do not hesitate to
contact me.

Very truly yours,

Lisa D. Nordstrom

LDN:sg
Enclosure

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Attorney for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)	CASE NO. IPC-E-21-13
COMPANY'S APPLICATION FOR)	
APPROVAL OF ITS LOAD CURTAILMENT)	IDAHO POWER COMPANY'S
AND INTERRUPTION PLAN)	REPLY COMMENTS
_____)	

Idaho Power Company ("Idaho Power" or "Company"), respectfully submits the following Reply Comments pursuant to Order No. 35149 in response to Comments of the Idaho Public Utilities Commission ("Commission") Staff dated September 22, 2021.

I. BACKGROUND

On May 11, 2021, Idaho Power applied for approval of its 2021 Load Curtailment and Interruption Plan and for authority to update its Electric Service Rule J, Continuity, Curtailment, and Interruption of Electric Service ("Rule J") (the "Application"). The Application summarized the history of the Company's curtailment plan and laid out its proposed 2021 Load Curtailment and Interruption Plan ("LCIP") and the associated updates to Rule J intended to increase transparency for customers and stakeholders. The Company's filing was made pursuant to Idaho Code § 61-531, Plan for Curtailment of Electric or Gas Consumption, which requires all suppliers of electric power and energy to

file a plan for curtailment with the Commission.

On September 22, 2021, Commission Staff filed Comments in this matter. Staff's review found the LCIP to be in compliance with Idaho Code § 61-532 and recommended approval of the Company's Application as filed. Staff further recommended the Commission direct the Company to meet with Staff and interested parties to gather feedback, and based on that feedback, update notification procedures related to the LCIP and contained within the Company's Emergency Response Communication Plan ("ERCP").

II. IDAHO POWER'S REPLY

Idaho Power appreciates Staff's recommendation that the Commission approve the Company's Application as filed. These comments respond to Staff's additional recommendations for the Company to (1) hold a meeting with Staff, the Idaho Office of Emergency Management ("OEM"), and Emergency Support Function #12 ("Energy") to develop a plan to clearly define communication requirements to be exercised in the event of an emergency or disaster, and (2) meet with Staff, electric providing municipalities, electric cooperatives, Demand-Side Management ("DSM") participants, and other stakeholders to improve upon the plan's notification procedures to minimize stakeholder impact of future curtailment.

A. Communication Requirements and Protocols

With wildfire risks, resource adequacy concerns, climate change and other factors prominently impacting portions of the Pacific Northwest and Western Interconnection, clear communication processes among the Company and state agencies are essential. Idaho Power commits to meet with the identified stakeholders to more clearly define

communication requirements and protocols. The Company will rely on this feedback to ensure its ERCP contains the right level of detail to enhance its effectiveness. The Company expects that, pending availability of the other participants, that it would be able to initiate these discussions by the end of 2021 and incorporate any enhancements into its annual internal ERCP review and update in early 2022.

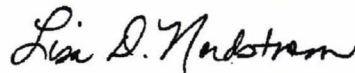
B. Improvements to Notification Procedures

The Company also agrees with Staff's recommendation to meet with Staff, electric providing municipalities, electric cooperatives, DSM participants, and other stakeholders to improve upon the LCIP's notification procedures to minimize stakeholder impact of future curtailment. One of the primary goals of the LCIP is to minimize the impact of curtailments and interruptions on customers. Notification to stakeholders of impending system events as early as practicable is one of the ways the Company can achieve this goal. The Company anticipates holding discussions with the identified stakeholders in advance of the 2022 summer season.

III. CONCLUSION

Idaho Power respectfully requests that the Commission issue an order accepting the Company's LCIP and Rule J revisions.

Respectfully submitted this 6th day of October 2021.



LISA NORSTROM
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of October, 2021, I served a true and correct copy of the within and foregoing IDAHO POWER COMPANY'S REPLY COMMENTS upon the following named parties by the method indicated below, and addressed to the following:

Commission Staff

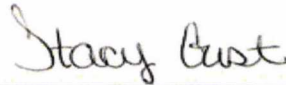
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