

ELECTRIC SERVICE REGULATION NO. 13

STATE OF IDAHO

Curtailment Plan for Electric Energy

INTRODUCTION:

The Idaho Public Utilities Commission ordered¹ the Company and other suppliers of electric service operating in the State of Idaho to adopt provisions relating to electric service curtailment. This document summarizes the curtailment plan employed by the Company to temporarily interrupt electric service to its customers during emergencies and power shortages. It is intended to provide equitable procedures for the curtailment of power, minimize adverse impacts to essential services, and customers, while maintain overall system reliability.

The curtailment plan is operational 24 hours a day, 365 days a year, to help ensure that the Company is able to:

- Match customer demand and electrical supply generation;
- Maintain the integrity of the electrical network;
- Deploy available resources to restore electrical supply to normal as soon as is practicable;
- Apply existing processes to keep customers and stakeholders informed of the state and progress of the incident or emergency;
- Utilize communication avenues to appeal to customers to reduce electricity consumption;
- Coordinate with appropriate agencies to provide options to lessen the impact to customers;
- Meet applicable operating standards.

Operating Standards

The Company is a member of the Western Electricity Coordinating Council (WECC), one of the eight Regional Entities of the North American Electric Reliability Corporation (NERC). The Company also supports Regional Reliability Coordinators, who monitor voltages, frequencies, and other reliability indices.

WECC develops and implements Regional Reliability Standards and Criteria for the Western Interconnection and is the regional entity responsible for compliance monitoring and enforcement with delegated authority from the North American Electric Reliability Corporation (NERC) and Federal Energy Regulatory Commission (FERC).

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¹ Order No. 25259, November 24, 1993.

Operating Standards (continued)

Bulk electric system reliability and operating standards for utilities in the western part of the United States provide for a coordinated effort to effectively manage energy shortage situations and includes shedding firm load in an emergency situation using the Company's Under Frequency and/or Under Voltage Load Shedding programs to arrest declining frequency, assist recovery of frequency following under frequency events and provide last resort system preservation measures to prevent a blackout or voltage collapse.

Emergencies that threaten the integrity of the electric system can develop at any time due to shortage of generation or disturbances on the system, either locally or within the Western Interconnect. The actions necessary to prevent total collapse of the system will be to; restrict customer demand, match generation availability, implement network capacity limitations. The circumstances necessitating a reduction in the demand or consumption of electricity in the short term will require that immediate emergency action is taken and may potentially lead directly to firm load curtailment.

SECTION I. PURPOSE AND OVERVIEW OF THE CURTAILMENT PLAN

This plan identifies the process by which the Company would initiate and implement regional load curtailment. The goal of this plan is to accomplish curtailment while treating customers fairly and equitably, minimizing adverse impacts from curtailment, complying with existing State laws and regulations, and providing for smooth, efficient, and effective curtailment administration.

SECTION II. LOAD CURTAILMENT

The Company will comply with all State and Federal mandates to curtail the electric energy used by its customers to stabilize system voltage and frequency in order to prevent a regional system collapse. Events that may trigger load curtailment, either upon notice from state agencies, the RC West Regional Reliability Coordinator, or at the discretion of the Company, include but not limited to:

- Loss of major generation or transmission equipment due to mechanical or electrical failure.
- Extreme hot or cold temperatures that create a network peak where generation capacity does not meet load center requirements.
- System disturbance within the regional balancing area.

Initiation of Load Curtailment

Load curtailment will be initiated when directed by the North American Electric Reliability Corporation (NERC), the Western Electricity Coordinating Council (WECC) authorities, or by order of the Idaho Public Utilities Commission under authority provided for in *Idaho Code* § 61-534. However, nothing precludes the Company from requesting voluntary load reduction at any time.

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SECTION II. LOAD CURTAILMENT (continued)

Automatic, Remote and Manual Actions

Automatic actions occur through the operation of programmed protective equipment installed in the 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 the Company, threaten system performance, integrity, reliability or stability.

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.

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 RC West Regional Reliability Coordinator to vary said sequence in order to protect system performance, integrity, reliability, or stability.

SECTION III. CURTAILMENT STAGES

State curtailment directives apply to all retail loads served within the State of Idaho. The curtailment stages are associated with increasing energy deficits. The circumstances necessitating a reduction in the demand or consumption of electricity in the short term will normally require that immediate emergency action is taken and there may be 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.

Stage #	Nature	Estimated Curtailment Percent	Type of Curtailment
Stage 1	Mandatory	5% +/-	Demand Side Management Programs activated
Stage 2	Voluntary – public appeal to restrict usage	No specified %	Uniform among all customers
Stage 3	Mandatory – peak curtailment block rotation	2.5 to 3.5% +/-	General Use Customers Residential Customers
Stage 4	Mandatory –curtailment block rotation	30% of peak +/-	General Use Customers Residential Customers
Stage 5	Mandatory – Emergency Load Shed Groups	% determinate upon RC West Regional Reliability Coordinator directive	Uniform among all customers

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SECTION IV. INITIATION OF LOAD CURTAILMENT

Block Rotation

Selected distribution feeders throughout the service territory have been grouped into blocks of approximately 100 MW in size. These blocks provide for two (2) hour rotational curtailments to be used in scheduled combinations to ensure that the required load shed amount is achieved. Block rotation may be utilized to support system stabilization following a system disturbance, or to maintain system integrity during peak load periods.

During load curtailment the Company would rotate through the blocks until curtailment is no longer necessary. Block rotation is dependent on what day of the week and time of day the curtailment event is enacted. This provides for equitable treatment to affected customers. Blocks are aggregated to match reduction thresholds during events.

Emergency Load Shed Groups

Predetermined localized load shed groups are utilized for situations where load reductions might be necessary for specific high load areas. These areas generally require specialized load curtailment schemes to accommodate transmission path restrictions. Load shed groups contain only SCADA controllable circuits.

Minimization of Impact

The Company will implement rotational curtailment in as fair and equitable a manner as practicable, with the goal of minimizing the impacts on communities. Where known and feasible within operational parameters, distribution feeders serving facilities essential to the public welfare are avoided during rotational curtailment. However, it should be noted that the Company cannot definitively account for all such facilities, nor is it possible to exclude every known facility from the impacts of curtailment.

Such essential facilities include:

- Hospitals
- 911 centers
- Airports and FAA facilities
- Large sewer and water treatment plants
- Major metropolitan downtown core areas
- Facilities critical to electric system operation
- Prisons, police, and fire stations including related computer and communication centers
- Radio, TV news, emergency broadcast stations and transmitting facilities
- U.S. Military installations

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SECTION V. NOTIFICATIONS AND ACTIONS

Throughout the curtailment period the Company will provide customers and external State and regulatory stakeholders with as much information as possible utilizing established processes and protocols.

The Company's incident management strategy for an energy emergency is consistent with the National Incident Management System and Incident Command System, and provides effective coordination through:

- Procedures that allow system and field operations to focus on critical functional responsibilities;
- Providing pertinent information to internal and external stakeholders, customers, regulators, media outlets, etc.;
- Flexible response to changing circumstances, special customer needs and emergencies.

Stage 1: Demand Side Management Programs

The Company would not normally contact the public or news media when it exercises options under demand side management programs.

Stage 2: Public Appeal for Conservation

At the Company's discretion, a public appeal for voluntary energy conservation may be issued through media outlets, social media platforms, and automated outbound calling of customers requesting voluntary curtailment of nonessential uses.

Additionally, the Company will initiate curtailment of all nonessential Company use, request curtailment of nonessential use by governmental agencies and institutions at all levels, request voluntary curtailment of nonessential use in all large buildings, and direct specific requests to major use customers for voluntary curtailment of nonessential use.

If additional curtailment is required the Company will intensify its request to the public, including requests to curtail less-essential uses, and notice that if curtailment does not occur, mandatory curtailment may be necessary by utilizing block rotation methods.

Stage 3: Peak Load Curtailment

Prior to any rotating outages, the Company, to the best of its ability will contact key external stakeholders to inform them of the situation. To the extent possible, areas targeted for rotating outages may be disclosed at this time, together with some estimate of how long the outages will be necessary. The magnitude of the event will dictate the administrative level to which external notifications will be made.

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SECTION V. NOTIFICATIONS AND ACTIONS (continued)

Key external stakeholders include, but are not limited to:

- Governor's office
- Public Utilities Commission
- State energy/emergency response officials
- Legislative leadership
- Key customer accounts

Stage 4: Block Load Curtailment

In addition to the actions above, to the extent possible, customers in the areas targeted for rotating outages will be notified as soon as practicable and provided with an estimate of the time their block will be curtailed and the expected duration.

Stage 5: Emergency Load Shed Groups

Generally, no advance notice of an event necessitating emergency load shed is available. Therefore, it is to be expected that all internal and external notifications will occur as soon as information is known.