

## DECISION MEMORANDUM

**TO:** COMMISSIONER KJELLANDER  
COMMISSIONER RAPER  
COMMISSION SECRETARY  
COMMISSION STAFF

**FROM:** BRANDON KARPEN  
DEPUTY ATTORNEY GENERAL

**DATE:** JULY 17, 2015

**SUBJECT :** APPLICATION TO UPDATE AND REVISE CURTAILMENT PLAN,  
CASE NO. PAC-E-15-10

On June 25, 2015, PacifiCorp dba Rocky Mountain Power (“Rocky Mountain” or “Company”) filed an Application seeking authority to update and revise its 1993 Curtailment Plan. The Curtailment Plan sets out the actions that the Company will employ during periods when it experiences energy shortages. Application at 2. According to the Company, the current Curtailment Plan addresses only contingencies for long-term energy shortages, but does not address short-term supply emergencies. Over the last 22 years, changes in technology, industry practices, and increases in generation capacity have made the 1993 Curtailment Plan obsolete.

Rocky Mountain proposes to update the plan to include new provisions for load reduction with demand-side management and emergency load shed groups, removal of financial penalties, and clarification regarding what entity can initiate load curtailment. A. Shingleton Direct at 2. The proposed plan covers a broader range of events that could lead to a load curtailment situation, incorporates new curtailment sources, and addresses long- and short-term supply emergencies. *Id.* at 2-5

### THE APPLICATION

Rocky Mountain is a public utility engaged in the generation, transmission and distribution of electricity. Rocky Mountain’s service area includes parts of southeastern Idaho. In 1993, by Order of the Commission,<sup>1</sup> Rocky Mountain adopted provisions relating to electric service curtailment during periods of prolonged energy shortages. These provisions formed the

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<sup>1</sup> Case No. GNR-E-93-2, Order No. 25259.

Curtailement Plan that Rocky Mountain filed with the Commission in 1993, which was the last time the Company filed such a plan with the Commission.

Rocky Mountain claims the existing Curtailement Plan (the “1993 Plan”) is deficient in addressing contingencies for short-term emergencies, and is also obsolete due to changes in technology, new industry practices, and advanced generation capacity developed over the past 22 years. The Company proposes to modify the 1993 Plan to: “(a) include new provisions for load reduction with demand-side management and emergency load shed groups; (b) remove financial penalties [from the 1993 plan]; and (c) clarify the types of entities that can initiate load curtailment.” Application at 2. The proposal also increases the range of activates that can precipitate load curtailment activities. *Id.*

Rocky Mountain claims that the proposed plan combines elements of the Company Emergency Management Plan filed in 2001, using the 1993 Plan as a starting point. The Company claims that the updated plan will focus on “practical and actionable operational activities the Company can initiate during emergencies to minimize adverse impacts to consumers and restore system stability.” *Id.*

Rocky Mountain also proposed elimination of portions of the 1993 Plan that relate to financial penalties and how curtailment is audited and tracked. *Id.* at 3. The Company argues that the 1993 Plan’s inclusion of financial penalties is inappropriate in light of Commission Order No. 25259, which “states [the Commission’s] preference that utilities not incorporate monetary penalties within their respective plans.” *Id.* Finally, the proposed plan incorporates new curtailment sources, “including DSM capabilities and interruptible customer load shed programs.” Further, the proposed plan includes the ability for the Company to utilize block rotation in scheduled two-hour periods during emergency periods.

Rocky Mountain has requested that this Application be processed under Modified Procedure.

#### **STAFF RECOMMENDATION**

Staff recommends that the Commission issue a Notice of Application and set a 14-day intervention deadline, and direct Staff to informally confer with the parties about scheduling. Finally, Staff recommends the setting of an informal scheduling meeting take place once the Notice of Parties has been issued.

**COMMISSION DECISION**

Does the Commission wish to issue a Notice of Application, establish a 14-day intervention deadline, and direct Staff to informally confer with the parties about scheduling?

Brandon Karpen  
Brandon Karpen  
Deputy Attorney General

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