

DECISION MEMORANDUM

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

FROM: BRANDON KARPEN
DEPUTY ATTORNEY GENERAL

DATE: NOVEMBER 19, 2015

SUBJECT: ROCKY MOUNTAIN POWER'S APPLICATION TO UPDATE AND
REVISE ITS CURTAILMENT PLAN, CASE NO. PAC-E-15-10

On November 24, 1993, the Idaho Public Utilities Commission ordered that suppliers of electric service operating in the State of Idaho adopt certain provisions relating to electric service curtailment. *See* Case No. GNR-E-93-2, Order No. 25259. The curtailment provisions were based on a regional curtailment plan designed to deal with long-term energy shortages and to promote curtailment uniformity among the four Pacific Northwest states of Oregon, Washington, Idaho and Montana. *See* Application at 2. Pursuant to the Commission Order, Rocky Mountain adopted curtailment provisions in 1993. *Id.*

On June 25, 2015, Rocky Mountain Power filed an Application seeking authority to update and revise its 1993 Curtailment Plan. According to the Company, the 1993 Curtailment Plan addresses only contingencies for long-term energy shortages, but does not address short-term supply emergencies. *Id.*

Rocky Mountain proposes to update the plan to include new provisions for load reduction with demand-side management (DSM) and emergency load shed groups, removal of financial penalties, and clarification regarding what entity can initiate load curtailment. 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.

On July 22, 2015, the Commission issued a Notice of Application and set an intervention deadline of August 5, 2015. No one applied for intervention, and it is now

appropriate for the Commission to set forth a schedule and procedure for processing the Application. Staff and the Company have conferred and proposed a schedule to process this case as set out below.

THE APPLICATION

According to Rocky Mountain, over the last 22 years, changes in technology, industry practices, and increases in generation capacity have made the 1993 Curtailment Plan obsolete. Rocky Mountain further claims the existing plan is deficient in addressing contingencies for short-term emergencies. 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 events that can precipitate load curtailment activities. *Id.*

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

STAFF RECOMMENDATION

Staff recommends the Commission issue a Notice of Modified Procedure establishing the following comment deadlines to process the Application:

Comment deadline: February 25, 2016

Company response deadline: March 10, 2016

Staff has met and conferred with representatives of Rocky Mountain, and they have no objection to the proposed schedule.

COMMISSION DECISION

Does the Commission wish to issue a Notice of Modified Procedure, and establish comment deadlines consistent with Staff’s recommendation?

 /s/ *Brandon Karpen*
Brandon Karpen
Deputy Attorney General

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