



July 10, 2025

ELECTRONICALLY FILED WITH RCA

Regulatory Commission of Alaska
701 W. 8th Avenue, Suite 300
Anchorage, Alaska 99501

Subject: Tariff Advice No. 575-8: Additional Modifications by Chugach Electric Association, Inc. to Address Curtailment in Compliance with Letter Order No. L2500146

Commissioners:

The tariff filing described below is submitted in compliance with the Alaska Public Utilities Regulatory Act and Sections 3 AAC 48.200 – 3 AAC 48.430 of the Alaska Administrative Code. The purpose of this filing is to provide further detail regarding Chugach Electric Association, Inc.'s (Chugach) Operating Tariff in response to Letter Order No. L2500146 regarding the interruption of electric service.

<u>TARIFF SHEET NUMBER</u>		<u>CANCELS SHEET NUMBER</u>		<u>SCHEDULE OR RULE NUMBER</u>
<u>ORIGINAL</u>	<u>REVISED</u>	<u>ORIGINAL</u>	<u>REVISED</u>	
12	4 th Revision	12	3 rd Revision	Nature
12.1	2 nd Revision	12.1	1 st Revision	of
12.2	1 st Revision	12.2	Original	Service
12.3	Original	-	-	Offered
64	4 th Revision	64	3 rd Revision	Definitions

This filing is not for a new service, will not result in the termination of an existing service, conflict with any other schedule or rate contained in Chugach's operating tariff, or in any other way adversely impact customers or the public. Chugach provides electric service to approximately 90,000 retail members across 113,000 retail metered locations and to wholesale customer the City of Seward d/b/a Seward Electric System (Seward).

On May 1, 2025, Chugach filed Tariff Advice No. 572-8 to update the rules governing Chugach's authority to interrupt electric service in the event of an energy shortage. On June 9, 2025, the Regulatory Commission of Alaska (Commission) approved the filing in Letter Order No. L2500146 but required Chugach to further modify its operating tariff with the additional curtailment provisions. Chugach's proposed modification in compliance with each requirement is discussed below:

Commission Requirement 1: Include a definition of curtailment.

Chugach Response: Chugach has defined the term “Curtailment” to mean “[t]he temporary reduction or interruption of electric service or Transmission Service by Chugach to service locations because of projected or actual supply or capacity constraints, system reliability issues, or other emergency conditions, as further defined in Rules 2.2 (Curtailment or Interruption of Electric Service) and 12.1 (Transmission Service). This definition has been included on Tariff Sheet No. 64.

Commission Requirements 2-4: Include (a) an identification of the amount of reasonable advanced notice that will be provided to the members of the public that will be curtailed; (b) a description of how communications on the expected duration of the curtailment will be conveyed to the public; and (c) an identification of the location on the Internet where reasonably up-to-date information on the curtailment will be located.

Chugach Response: To keep members informed, Chugach proposes to implement an energy watch program using Green, Yellow, and Red color conditions that represent the current state of Chugach’s system. This approach replicates the plan developed by electric and gas utilities and local government agencies in Southcentral Alaska to communicate the status of natural gas supply into the area.

A “Green” condition indicates that Chugach’s system is normal, with no curtailments anticipated. A “Yellow” condition signifies that the system remains normal but may be subject to curtailment due to forecasted disturbances or reasonably anticipated near-term supply issues. A “Red” condition reflects an abnormal system currently experiencing curtailments.

Color conditions may not progress sequentially from Green to Yellow to Red. In emergency or unforeseen circumstances, system status may shift directly from Green to Red. Depending on the circumstances and the extent to which the disturbance resulting in a curtailment is known in advance, Chugach will make its best effort to provide at least 24 hours advance notice to members before curtailments begin. Chugach will provide timely updates to its members via its website at www.chugachelectric.com, including the current color condition status, outage schedules, and any recommended actions for members to take in a curtailment situation. Links to the Association’s outage map will be available online. Information will also be shared through news releases and social media channels. Chugach’s website will be updated regularly during curtailment situations.

If Chugach transitions to a Red condition requiring curtailment, rotating outages will begin. Members will be notified as soon as practicable via local media, Chugach’s website, outbound telephone calls and emails with information estimating the curtailment start time and expected duration. Chugach’s goal is to distribute a curtailment schedule to members the evening prior to any scheduled outages, but curtailment circumstances may preclude this.

Commission Requirement 5: Include an explanation of how curtailment will occur by zone or for each type or class of customers. The explanation should also identify any customers that would be exempt from curtailment and, if not curtailed by zone, any curtailment priority based on the class or type of customer. Identified curtailment priorities must address the following types or classes of customers: (a) residences, (b) hospitals, (c) water and wastewater facilities, police, fire, (d) military and civil defense facilities, (e) locations where people may congregate in an

emergency, such as shelters, schools, or places of worship, and (f) small commercial customers that cannot practicably be curtailed without endangering critical human needs.

Chugach Response: Chugach will utilize its predefined list of 83 substation feeder breakers to implement curtailments on a rotating basis. A feeder breaker is a circuit breaker that is controlled and protects a feeder circuit that is comprised of conductors carrying electricity from a substation to a specific area or group of consumers. Through its supervisory control and data acquisition (SCADA) system, Chugach remotely controls the operation of the breaker that delivers power to members through each feeder circuit. Curtailments will be made according to the following steps:

1. Assess the gas supply constraint and quantify the necessary curtailment in megawatts.
2. Open feeder breakers as necessary to reduce system load to a level that matches the available supply.
3. Keep feeder breakers open for approximately 60 minutes before restoring power and rotating to the next group of feeder breakers on the list matching the curtailed load.
4. Continue rotating through the feeder breakers list until the curtailment is resolved.

The predefined list of 83 feeder breakers does not include feeders with critical locations such as hospitals, airports, water and wastewater processing, public safety offices, Anchorage School District administrative offices, the Alaska Railroad Depot, or military bases. Chugach is not able to efficiently curtail only one customer class of service but rather rotating curtailments are completed on a circuit basis which includes all customer classes of service.

Commission Requirement 6: Include an explanation of recommended voluntary actions that customers can take prior to, during, and after curtailment.

Chugach Response: Chugach has added an explanation to its tariff to encourage members to take the following actions during curtailment situations:

1. Adjust thermostat settings: lower temperatures in the winter and raise temperatures in the summer for buildings with air conditioning units.
2. Delay or avoid using major appliances: avoid or minimize use of washers, dryers, dishwashers, and ovens.
3. Turn off non-essential lighting and equipment: unplug televisions, computers, and other electronics when not in use.
4. Avoid using hot tubs, electric saunas, and delay charging electric vehicles.

Commission Requirement 7: Provide the following, to the extent Chugach has the information: (a) a list of large customers or members that have the ability to self-generate power; (b) fuel source used by these large members to self-generate power; and (c) whether these large members purchase power under an interruptible rate.

Chugach Response: Chugach does not collect member self-generation information in the normal course of business aside from its net metering and standby buyback members. Following receipt of Letter Order No. L2500146, however, Chugach conducted a voluntary survey of its large commercial members requesting this information. Based on those survey results, as well as internal billing data, Chugach is aware of 27 large commercial members and one wholesale customer that have at least 24 hours of full or partial backup self-generation capability. The total installed capacity of those 27 members is approximately 31.1 megawatts of gas or diesel fired generation. Chugach currently does not have any retail customers who receive interruptible service. Chugach's wholesale customer, Seward, receives power under an interruptible wholesale agreement. Eleven members expressed interest in purchasing electricity from Chugach under an interruptible rate. Chugach can provide customer specific information on a confidential basis under separate cover if the Commission deems such information necessary.

Explanation of Tariff Sheet Changes

Tariff Sheet No. 12: This sheet has been updated to include curtailment as a type of service interruption.

Tariff Sheet No. 12.1: Sections 2.3 and 2.4 have been moved to sheet 12.3, and an outline of curtailment procedures due to supply constraints have been added.

Tariff Sheet No. 12.2: Section 2.5 has been moved to sheet 12.3. Rule 2.2 has been expanded to this sheet to include further curtailment procedures. Voluntary conservation recommendations have also been added as subsection c.

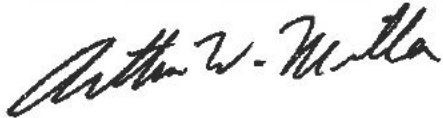
Tariff Sheet No. 12.3: This sheet has been created to accommodate Rules 2.3 and 2.4 from sheet 12.1 and Rule 2.5 from sheet 12.2.

Tariff Sheet No. 64: Chugach added a definition of "Curtailment".

Please contact David Caye, Manager, Regulatory Affairs at (907) 762-4842 or David_Caye@chugachelectric.com if additional information is needed.

Sincerely,

CHUGACH ELECTRIC ASSOCIATION, INC.



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Attachments

cc: Kat Sorenson, Seward City Manager, City of Seward (electronically)



Chugach Electric Association, Inc.

2. NATURE OF SERVICES OFFERED**2.1 Electric Service**

Chugach provides 60 cycle, alternating current, either single or three phase, at available standard voltages. Voltage, frequency, and wave form are regulated to conform to the standard practices of the industry.

Chugach shall construct, operate, and maintain the facilities necessary to deliver electrical energy to the point of receipt by the member, but Chugach will not be responsible for loss or damage caused by interruptions of service unless caused by Chugach's negligence.

2.2 Curtailment or Interruption of Electric Service

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(a) Curtailment or Interruption Generally

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Chugach shall exercise reasonable diligence and care in furnishing and delivering a continuous and adequate supply of electric energy to its members but does not guarantee continuity or sufficiency of supply. Chugach shall not be liable for any interruption, Curtailment, insufficiency, or shortage of supply, or for any resulting loss or damage of any nature related thereto, when caused by unavoidable accident, act of God, fire, labor disputes, civil disturbances, war, or any other cause beyond its reasonable control, except where such interruption or insufficiency is directly attributable to Chugach's failure to exercise reasonable diligence.

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Chugach reserves the right to interrupt or Curtail the delivery of electric service without notice or liability to its members when, in Chugach's sole discretion, such interruption or Curtailment is necessary for reasons including, but not limited to, the following:

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1. Safety of a member, a Chugach employee, or the public.
2. Breach of code or regulation on either Chugach-owned or member-owned facilities.
3. Prevention of meter tampering or fraud.
4. Emergency conditions affecting or likely to affect Chugach's electric system or any other interconnected electric utility systems.
5. Maintenance, repairs, improvements, modifications, or expansions to Chugach's electric system. Chugach shall make good faith efforts to complete such work in a reasonably expeditious manner at times that will minimize inconvenience to members while not causing additional cost to Chugach.



Chugach Electric Association, Inc.

2.2 Curtailment or Interruption of Electric Service (Cont.)

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(b) Curtailment or Interruption Due to Supply Constraints

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Chugach also reserves the right to Curtail or interrupt electric service without prior notice or liability to its members in cases of shortage of supply of electric energy for any reason including, but not limited to, shortage of natural gas supply. During supply shortages, Chugach will apportion its available supply of electric energy among its members consistent with its Curtailment procedures detailed below, as well as exercise reasonable effort to provide transparent communication with members as outlined herein.

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Chugach will utilize its predefined list of 83 substation feeder breakers to implement Curtailments on a rotating basis. A feeder breaker is a circuit breaker that is controlled and protects a feeder circuit that is comprised of conductors carrying electricity from a substation to a specific area or group of consumers. Through its supervisory control and data acquisition (SCADA) system, Chugach remotely controls the operation of the breaker that delivers power to members through each feeder circuit. Curtailments will be made according to the following steps: (1) Assess the gas supply constraint and quantify the necessary Curtailment in megawatts; (2) Open feeder breakers as necessary to reduce system load to a level that matches the available supply; (3) Keep feeder breakers open for approximately 60 minutes before restoring power and rotating to the next group of feeder breakers on the list matching the Curtailed load; and (4) Continue rotating through the feeder breakers list until the Curtailment is resolved. The predefined list of 83 feeder breakers does not include feeders with critical locations such as hospitals, airports, water and wastewater processing, public safety offices, Anchorage School District administrative offices, the Alaska Railroad Depot, or military bases.

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To keep members informed, Chugach proposes to implement an energy watch program using Green, Yellow, and Red color conditions that represent the current state of Chugach's system. This approach replicates the plan developed by electric and gas utilities and local government agencies in Southcentral Alaska to communicate the status of natural gas supply into the area.

A "Green" condition indicates that Chugach's system is normal, with no Curtailments anticipated.

A "Yellow" condition signifies that the system remains normal but may be subject to Curtailment due to forecasted disturbances or reasonably anticipated near-term supply issues.

A "Red" condition reflects an abnormal system currently experiencing Curtailment.

N, L

L – The material in sections 2.3 and 2.4 has been moved to Tariff Sheet No. 12.3



Chugach Electric Association, Inc.

2.2 Interruption or Curtailment of Electric Service (Cont.)

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Color conditions may not progress sequentially from Green to Yellow to Red. In emergency or unforeseen circumstances, system status may shift directly from Green to Red. Depending on the circumstances and the extent to which the disturbance resulting in a Curtailment is known in advance, Chugach will make its best effort to provide at least 24 hours advance notice to members before Curtailments begin. Chugach will provide timely updates to its members via its website at www.chugachelectric.com, including the current color condition status, outage schedules, and any recommended actions for members to take in a curtailment situation. Links to the Association's outage map will be available online. Information will also be shared through news releases and social media channels. Chugach's website will be updated regularly during curtailment situations.

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(c) Voluntary Member Conservation Measures

Energy conservation is always encouraged, however, during curtailment situations, Chugach members are encouraged to take the following actions:

1. Adjust thermostat settings: lower temperatures in the winter and raise temperatures in the summer for buildings with air conditioning units.
2. Delay or avoid using major appliances: avoid or minimize use of washers, dryers, dishwashers, and ovens.
3. Turn off non-essential lighting and equipment: unplug televisions, computers, and other electronics when not in use.
4. Avoid using hot tubs, electric saunas and delay charging electric vehicles.

L, N

L – The material in section 2.5 has been moved to Tariff Sheet No. 12.3

**2. NATURE OF SERVICES OFFERED (Cont.)****2.3 Member's Equipment**L¹

The member's electrical equipment and facilities shall conform and be installed in compliance with this tariff and with applicable federal, state, borough and city statutes, ordinances, and regulations. Chugach does not give an expressed or implied warranty as to the adequacy, safety or other characteristics of a structure, equipment, wire, conduit, appliance or device owned, installed or maintained by the member or leased by the member from third parties, by virtue of its inspection or non-rejection of the facilities or equipment. When inconsistencies exist between the installation standards established by the above referenced codes, the most stringent standards shall be applied.

2.4 Consequential Damages

Chugach disclaims liability for any injury, casualty, or damage resulting from the supply or use of electricity or from the presence or operation of Chugach structures, equipment, wires conduit, appliances, or devices on the member's premises, except injuries or damages resulting directly from the negligence of Chugach, its officers, or employees.

L¹**2.5 Voltage**L²

The standard practices of the industry regarding voltage, frequency and wave form referred to in Section 2.1 are as follows:

(a) Where available:

7,200	volts single phase
14,400	volts single phase
7,200/12,470	volts three phase 4-wire wye
14,400/24,900	volts three phase 4-wire wye

(b)	120/208	volts three phase 4-wire wye
	277/480	volts three phase 4-wire wye
	120/240	volts single phase
	240/480	volts single phase

(c) For existing services on overhead system only:

120/240	volts three phase 4-wire delta
240/480	volts three phase 4-wire delta

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L¹ – The material has been moved from Tariff Sheet No. 12.1

L² – The material has been moved from Tariff Sheet No. 12.2



Chugach Electric Association, Inc.

9.2 Definitions (Continued)

Conduit: a structure containing one or more ducts through which conductor(s) (wire(s)) are pulled.

Connect: the energizing of a service by the installation of a meter or in some cases the transfer of accounts on some existing services.

Consumer-Generated Electric Energy: Electric energy that is generated by a customer eligible for participation in a net metering program.

Consumer Premises: All buildings and associated grounds owned by, leased by, rented to, or licensed to a consumer at a single location where an electric utility provides service through one or more utility meters.

Corflo: A normally black colored, plastic-like flexible conduit used for the temporary above ground installation of insulated secondary voltage cables and services.

Curtailment: The temporary reduction or interruption of electric service or Transmission Service by Chugach to service locations because of projected or actual supply or capacity constraints, system reliability issues, or other emergency conditions, as further defined in Rules 2.2 (Curtailment or Interruption of Electric Service) and 12.1 (Transmission Service).

Cycle: alternating current as utilized commercially changes polarity 60 times every second. Each 1/60 second is one cycle, or one complete change of polarity. Modern electrical systems maintain 60 cycles per second to a standard tolerance, to ensure that electric motors and other equipment will operate properly.

Damage: includes, but is not limited to, vandalism, broken glass or broken seals.

Demand: the maximum amount of power measured in kW in a 15-minute period which is required by a service. The demand upon which billing to a member is based is specified in Chugach's rate schedule or an applicable contract.

Disconnect: term used when electric service is physically disconnected or taken out of a member's name.