

SOA 2024-01

**Priest Rapids Coordinating Committee  
Statement of Agreement on  
Energy Emergency Alert Level 3 (EEA 3)  
exception from Fish Mode.**

Submitted to PR Coordinating Committee: June 25, 2024

Approved by PR Coordinating Committee: July 23, 2024

**Statement**

The Priest Rapids Coordinating Committee (PRCC) agrees that in an Energy Emergency Alert Level 3 (EEA 3), as defined by the North American Electric Reliability Corporation (NERC) in the Reliability Standard Emergency Operations Procedure (EOP-011-2), Grant PUD may utilize the generating capacity of a turbine unit in excess of its maximum operating limit imposed by operating in “Fish Mode”. If and when an Energy Emergency Alert Level 3 (EEA 3) has been declared by Grant PUD or one of the Priest Rapids Project participants, the generation capacity in excess of “Fish Mode” may be utilized until the EEA 3 has ended. Within five (5) business days of an event, Grant PUD shall provide an incident report to the PRCC explaining the incident and all actions taken, to include data about the magnitude of energy generation provided by operating out of “Fish Mode”. At the September PRCC meeting of each year, an annual report of that year’s usage of this SOA will be presented for review. This SOA will remain valid for five (5) years from the approval date or the September following a cumulative count of five (5) EEA 3 incidents. The PRCC also reserves the right of evaluating the use and effectiveness of this SOA, with the understanding that authorization for use of these turbine units as during an EEA 3 during “Fish Mode” season can be withdrawn by a vote from the PRCC.

## Background

In rare but extreme conditions GPUD or one of our Balancing Authority Participants may run out of energy, energy reserves, or capacity. In these energy situations, Balancing Authorities may issue an Energy Emergency Alert (EEA). The purpose of an EEA is to provide real-time indication of potential and actual energy emergencies. To ensure that all Reliability Coordinators clearly understand potential and actual Energy Emergencies the North American Electric Reliability Corporation (NERC) has established three levels of EEAs.

An **EEA Level 1** is an indication that all available generation resources are in use and the Balancing Authority is experiencing conditions where all available generation resources are committed to meet firm Load, firm transactions, and reserve commitments, and is concerned about sustaining its required Contingency Reserves. In an **EEA Level 2**, the Balancing Authority is no longer able to provide its expected energy requirements and is energy deficient but is still able to maintain minimum Contingency Reserve requirements. In the most severe level, **EEA Level 3**, a Balancing Authority is unable to meet minimum Contingency Reserve and load interruption or load shedding is imminent or in progress (i.e. rolling black outs or brown outs). During an **EEA Level 3**, the Reliability Coordinator may direct generation and transmission utilities across the region to implement temporary, rotating power interruptions to prevent the system from reaching its breaking point. Load shedding involves systematically cutting power to different areas for short periods. This intentional reduction in demand helps prevent the electric system from overloading and potential equipment failures and gives the grid a chance to stabilize, as well as prevent extensive power outages.

We are proposing to allow GPUD to open capacity that is held back by fish mode if GPUD, or any of our load serving participants enter an **EEA Level 3**. We are proposing to keep the capacity above fish mode available until the **EEA Level 3** is resolved.