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Attorneys for Petitioner J.R. Simplot Company

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF PETITION OF	)	
IDAHYDRO, SHOROCK HYDRO, INC.,	)	Case No. IPC-E-18-07
J.R. SIMPLOT COMPANY, AND	)	
RENEWABLE ENERGY COALITION FOR	)	<b>J.R. SIMPLOT COMPANY'S SECOND</b>
MODIFICATION OF THE 90/110	)	<b>SET OF INTERROGATORIES</b>
PERFORMANCE BAND AND	)	
CALCULATION OF OPERATION AND	)	
MAINTENANCE CHARGES FOR PURPA	)	
QUALIFYING FACILITIES	)	

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Pursuant to Rule 225 of the Rules of Procedure of the Idaho Public Utilities Commission (the "IPUC" or "Commission"), the J.R. Simplot Company ("Simplot") by and through its attorneys of record, Gregory M. Adams and Peter J. Richardson, hereby requests that Idaho Power Company ("Idaho Power" or the "Company") provide responses to the following discovery requests. Please use the definitions and instructions supplied with the J.R. Simplot Company's First Set of Interrogatories, Requests for Admission, and Requests for Production.

**SECOND INTERROGATORIES**

**Interrogatory 11:** Please describe Idaho Power's currently-used method of calculating operation and maintenance charges to interconnection customers under FERC-jurisdictional small generator interconnection agreements and large generator interconnection agreements.

**Interrogatory 12:** If Idaho Power's currently-used method of calculating operation

and maintenance charges to interconnection customers under FERC-jurisdictional small generator interconnection agreements and large generator interconnection agreements is the same as its method for calculating such charges under Schedule 72 interconnections, please describe in detail how Idaho Power notified FERC of this method of calculating the charge and describe the manner in which FERC approved of use of the charge.

**Interrogatory 13:** Please identify all of Idaho Power's currently effective FERC-jurisdictional small generator interconnection agreements and large generator interconnection agreements including such agreements for Idaho Power-owned generation. Include in the list: (i) name of interconnection customer; (ii) method of calculating the operation and maintenance charges to the interconnection customer under the agreement; and (iii) section of the interconnection agreement that explains the method of calculating the operation and maintenance charges to the interconnection customer under the agreement.

Dated: June 13, 2018.

RICHARDSON ADAMS, P.L.L.C.



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Gregory M. Adams, ISB No. 7454  
Attorneys for Petitioner J.R. Simplot  
Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13<sup>th</sup> day of June 2018, a true and correct copy of the within and foregoing SECOND SET OF INTERROGATORIES of the J.R. Simplot Company to Idaho Power Company in Case No. IPC-E-18-07 were delivered via electronic mail to the following:

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