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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 THIRD</b>
MODIFICATION OF THE 90/110	)	<b>SET OF REQUESTS FOR</b>
PERFORMANCE BAND AND	)	<b>PRODUCTION TO IDAHO POWER</b>
CALCULATION OF OPERATION AND	)	<b>COMPANY</b>
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.

**THIRD REQUESTS FOR PRODUCTION**

**Production Request 23:** Please provide all documents filed with the Federal Energy Regulatory Commission requesting approval of 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.

**Production Request 24:** Please provide all orders issued by the Federal Energy Regulatory Commission approving of 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.

**Production Request 25:** Please provide all documents made available in Idaho Power Open Access Transmission Tariff and its Open Access Same-time Information System website, for prospective interconnection customers, describing 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.

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 THIRD SET OF REQUESTS FOR PRODUCTION 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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