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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)	
IDAHYDRO, SHOROCK HYDRO, INC.,)	CASE NO. IPC-E-18-07
J.R. SIMPLOT COMPANY, AND)	
RENEWABLE ENERGY COALITION FOR)	IDAHO POWER COMPANY'S
MODIFICATION OF THE 90/110)	ANSWER TO J.R. SIMPLOT
PERFORMANCE BAND AND)	COMPANY'S SECOND SET OF
CALCULATION OF OPERATION AND)	INTERROGATORIES
MAINTENANCE CHARGES FOR PURPA)	
QUALIFYING FACILITIES)	
_____)	

COMES NOW, Idaho Power Company ("Idaho Power"), and in answer to J.R. Simplot Company's Second Set of Interrogatories dated June 13, 2018, herewith submits the following information:

INTERROGATORY NO. 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.

ANSWER TO INTERROGATORY NO. 11: Idaho Power does not currently calculate operation and maintenance charges for any customers under either the small generator interconnection agreement ("SGIA") or large generator interconnection agreement ("LGIA").

The answer to this Interrogatory is sponsored by Aubrae Sloan, Accounting Manager, Idaho Power Company.

INTERROGATORY NO. 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.

ANSWER TO INTERROGATORY NO. 12: Please see Idaho Power's answer to J.R. Simplot Company's Interrogatory No. 11.

The answer to this Interrogatory is sponsored by Aubrae Sloan, Accounting Manager, Idaho Power Company.

INTERROGATORY NO. 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.

ANSWER TO INTERROGATORY NO. 13:

(i) Idaho Power currently has six Federal Energy Regulatory Commission jurisdictional, non-Public Utility Regulatory Policies Act of 1978 (PURPA) generator interconnection agreements with the following entities: Elkhorn Valley Wind Project; U.S. Geothermal, Inc.; City of Seattle, Lucky Peak Project; Caribou, Inc.; Idaho Power Company Power Supply, Evander Andrews; Idaho Power Company Power Supply, Langley Gulch.

(ii) All generator interconnection agreements for the above-referenced entities are the *pro forma* documents from Idaho Power's Open Access Transmission Tariff, and do not contain a method of calculating the operation and maintenance charges to interconnection customers.

(iii) While both the SGIA and LGIA contain statements that the interconnection customer shall be responsible for reasonable expenses associated with operating and maintaining interconnection facilities, neither the SGIA nor the LGIA contain methods of calculating operation and maintenance charges. See LGIA § 10.5; SGIA § 4.1.2.

The answer to this Interrogatory is sponsored by Jeremiah Creason, Operations Analyst II, Idaho Power Company.

DATED at Boise, Idaho, this 3rd day of July 2018.



DONOVAN E. WALKER
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of July 2018 I served a true and correct copy of IDAHO POWER COMPANY'S ANSWER TO J.R. SIMPLOT COMPANY'S SECOND SET OF INTERROGATORIES upon the following named parties by the method indicated below, and addressed to the following:

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