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Attorney for Idaho Power Company

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)	RESPONSE TO RENEWABLE
PERFORMANCE BAND AND)	ENERGY COALITION'S SECOND
CALCULATION OF OPERATION AND)	REQUEST FOR PRODUCTION
MAINTENANCE CHARGES FOR PURPA)	
QUALIFYING FACILITIES)	
)	

COMES NOW, Idaho Power Company ("Idaho Power" or "Company"), and in response to Renewable Energy Coalition's Second Request for Production to Idaho Power dated July 10, 2018, herewith submits the following information:

REQUEST FOR PRODUCTION NO. 2.1: In response to REC's request number 1.2, Idaho Power indicated that the workpapers applying the methodology to arrive at the escalating rates on Table 1 and 2 on Schedule 72 are not available. Idaho Power produced in Attachment 2 a document with the header "WORKPAPER IDAHO POWER COMPANY QUALIFYING FACILITIES INTERCONNECTION O&M SCHEDULE Schedule No. 72" detailing the final results in the table and the inputs used. Please apply these inputs to the methodology and show how the rates in Table 1 and 2 were reached.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.1: Renewable Energy Coalition's ("REC") Request for Production No. 1.2 requested Idaho Power provide the formula and all inputs that Idaho Power used to arrive at the percentages listed in Tables 1 and 2 of Idaho Power's Third Revised Sheet No. 72-17.

Attachment 2 provided with Idaho Power's response to REC's Request for Production No. 1.2 included (1) the document referenced above, which provided the inputs, and (2) Idaho Public Utilities Commission's Staff's ("Staff") proposed formula for calculating the escalating rates. Both documents were available in paper form only. Idaho Power does not have the 1991-vintage spreadsheet that was used in the ultimate calculation that applied the inputs to Staff's proposed methodology to arrive at the final amounts used in Tables 1 and 2.

In an effort to be responsive to this Request, the Company has developed the spreadsheet provided on the enclosed CD, which produces the results matching Schedule 72 Tables 1 and 2. Please note that the model used in the spreadsheet is not identical to the Staff model, but applies similar logic.

The response to this Request is sponsored by Mark Annis, Senior Regulatory Analyst, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.2: In response to REC's request number 1.3, Idaho Power did not provide updated values for calculation of the appropriate O&M rate for interconnections 138 kV and above. Please provide the updated values necessary to perform a calculation for interconnections 138 kV and above.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.2: When responding to REC's Request for Production No. 1.3, the Company did not have the necessary information to respond. Subsequently, Staff provided that information, and the Excel spreadsheet included on the enclosed CD provides the updated values and calculation of the operation and maintenance ("O&M") rate for interconnections 138 kilovolts ("kV") and above.

The response to this Request is sponsored by Mark Annis, Senior Regulatory Analyst, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.3: Does the Operations and Maintenance charge cover the cost of replacement facilities once the facilities have reached the end of their useful life? If not, who covers the cost of replacement facilities?

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.3: The O&M charge covers the cost of replacement facilities whenever replacement is needed, regardless of the useful life assigned to the facilities.

The response to this Request is sponsored by Aubrae Sloan, Accounting Manager, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.4: Please refer to Idaho Power's responses to REC's Requests for Production Nos. 1.4 and 1.5.

a. Does Idaho Power continue to charge O&M rates on previous interconnection facilities indefinitely?

b. Consider an interconnection agreement with a length of 35 years and that provides for construction of a facility with a useful life of 32 years. Does the O&M charge still continue for years 32-35 even though the facility actually constructed is no longer useful?

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.4:

a. Yes. As described in the Company's response to REC's Request for Production No. 1.4, the O&M charge is applied to any existing facilities that are continuing in service because the Company continues to operate and maintain those facilities.

b. If the original facilities continue to be used beyond the 32-year estimated life, the O&M charge continues, based on the original cost of the facilities. Please see Tables 1 and 2 from Schedule 72, which show the rates for years 1-35 and for all years beyond 35 years.

As discussed in the Company's response to REC's Request for Production No. 2.3, when interconnection facilities fail during the contract period and are replaced, the O&M charge to the project does not change and the project is not charged for the costs of the replacement equipment.

The response to this Request is sponsored by Mark Annis, Senior Regulatory Analyst, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.5: Does Idaho Power charge FERC-Jurisdictional interconnections under its OATT for actual operations and maintenance charges or does Idaho Power use the same Schedule 72 formula for recovering operations and maintenance charges?

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.5: Please see Idaho Power's answer to J.R. Simplot Company's Interrogatory No. 11.

The response to this Request is sponsored by Mark Annis, Senior Regulatory Analyst, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.6: For each QF listed in Idaho Power's Response to J.R. Simplot's Request for Production No. 16, please provide an itemization of the interconnection facilities that were constructed including:

- a. Description of the facilities constructed (i.e. overhead lines, substations, poles, breakers, meters, etc.)
- b. Cost of each facility, and
- c. Whether each facility constructed is a transmission facility subject to the rates in Table 1 of Schedule 72 (138 kV and 161 kV) or a distribution facility subject to the rates in Table 2 of Schedule 72 (Below 138 kV)

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.6: The description of facilities constructed is contained in each Qualifying Facility's ("QF") Generator Interconnection Agreement. These agreements are voluminous and can be provided for review at Idaho Power's corporate headquarters. Please contact Tami White at (208) 388-6938 or Camilla McClusky at (208) 388-5821 to arrange.

The cost of each facility that has O&M charges applied, as well as whether they are subject to the transmission or distribution rate, is included in the Excel file provided on the enclosed CD.

The response to this Request is sponsored by Aubrae Sloan, Accounting Manager, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.7: For each QF listed in Idaho Power's Response to J.R. Simplot's Request for Production No. 16, please provide the original interconnection costs, the portion of the original interconnection cost that is subject to the rates in Table 1 of Schedule 72 (138 kV and 161 kV), the portion of the original interconnection costs that is subject to the rates in Table 2 of Schedule 72 (Below 138 kV), and the O&M charges collected per year for each year since 1990.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.7: Please see Idaho Power's response to REC's Request for Production No. 2.6 for the original interconnection costs, the portion of the original interconnection cost that is subject to the rates in Table 1 of Schedule 72 (138 kV and 161 kV), and the portion of the original interconnection costs that is subject to the rates in Table 2 of Schedule 72 (Below 138 kV). Please see Idaho Power's response to Idahydro's Request for Production No. 8 for the O&M charges collected per year for each year since 1990.

The response to this Request is sponsored by Aubrae Sloan, Accounting Manager, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.8: For the last 3 years, please list all O&M expenses incurred by Idaho Power in the operations and maintenance of Idaho Power's **distribution facilities of below 138 kV** including the following information:

- a. Description of the expense
- b. Date the expense was incurred
- c. Cost of the expense
- d. The O&M expense category from categories listed in Idaho Power's response to REC's Request for Production No. 1.2 Attachment 1
- e. The type of facility upon which the maintenance is performed (i.e. overhead lines, substations, poles, breakers, meters, etc.)
- f. The location of the facility where maintenance is performed
- g. Whether the maintenance was performed in an emergent situation and why it was emergent (i.e. to repair outages resulting from storms, etc.)
- h. If the expense was not incurred on an emergent basis, please provide the date Idaho Power identified the need for maintenance work and the date(s) the work was actually performed

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.8:

a-c. The Company records O&M expenses for distribution lines below 46 kV in Federal Energy Regulatory Commission ("FERC") Accounts 580 through 598. Please see the spreadsheet provided on the enclosed CD for the expenses incurred in the O&M of Idaho Power's distribution facilities for the time period 2015 through 2017.

d. The data provided in response to subparts a-c are included in the categories of Attachment 1 provided with the Company's response to REC's Request for Production No. 1.2 as follows:

Column A of Spreadsheet	Line in Attachment 1 Provided with the Company's Response to REC's Request for Production No. 1.2
Account 580000	Line 22 and Line 23 (total distribution operations)
Accounts 581000,582000,584000,585000,586000,587000,588000,589000	Line 23 (total distribution operations)
Account 583000	Line 21 and Line 23 (total distribution operations)
Account 590000	Line 27 and Line 28 (total distribution maintenance)
Accounts 592000,594000,595000,596000,597000,598000, 598001,599000	Line 28 (total distribution maintenance)
Account 593000	Line 26 and Line 28 (total distribution maintenance)

e. The type of facility upon which the maintenance is performed is categorized by the FERC system of accounts, as listed below:

Distribution Expenses

Operation

- 580 Operation supervision and engineering
- 581 Load dispatching (Major only)
 - 581.1 Line and station expenses (Nonmajor only)
- 582 Station expenses (Major only)
- 583 Overhead line expenses (Major only)
- 584 Underground line expenses (Major only)
 - 584.1 Operation of Energy Storage Equipment
- 585 Street lighting and signal system expenses
- 586 Meter expenses
- 587 Customer installations expenses
- 588 Miscellaneous distribution expenses
- 589 Rents

Maintenance

- 590 Maintenance supervision and engineering (Major only)
- 591 Maintenance of structures (Major only)
- 592 Maintenance of station equipment (Major only)
 - 592.1 Maintenance of structures and equipment (Nonmajor only)
 - 592.2 Maintenance of Energy Storage Equipment
- 593 Maintenance of overhead lines (Major only)
- 594 Maintenance of underground lines (Major only)
 - 594.1 Maintenance of lines (Nonmajor only)
- 595 Maintenance of line transformers
- 596 Maintenance of street lighting and signal systems
- 597 Maintenance of meters
- 598 Maintenance of miscellaneous distribution plant

The following link to the Code of Federal Regulations provides a detailed description of the type of expenses recorded to the above FERC accounts:

<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=0ae8a08d6e1697b03b739910eaa5ce06&mc=true&r=PART&n=pt18.1.101>.

f-h. Idaho Power does not separately track O&M charges in such a manner. Please see the Company's response to REC's Request for Production No. 1.11.

The response to this Request is sponsored by Aubrae Sloan, Accounting Manager, Idaho Power Company, and Mark Annis, Senior Regulatory Analyst, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.9: For the last 3 years, please list all O&M expenses incurred by Idaho Power in the operations and maintenance of Idaho Power's **transmission facilities of 138 kV and 161 kV** including the following information:

- a. Description of the expense
- b. Date the expense was incurred
- c. Cost of the expense
- d. The equivalent O&M transmission expense category to the categories listed in Idaho Power's response to REC's Request for Production No. 1.2 Attachment 1 for distribution facilities
- e. The type of facility upon which the maintenance is performed (i.e. overhead lines, substations, poles, breakers, meters, etc.)
- f. The location of the facility where maintenance is performed
- g. Whether the maintenance was performed in an emergent situation and why it was emergent (i.e. to repair outages resulting from storms, etc.)
- h. If the expense was not incurred on an emergent basis, please provide the date Idaho Power identified the need for maintenance work and the date(s) the work was actually performed

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.9:

a-c. The Company records transmission expenses for transmission lines 46 kV and above to FERC Accounts 560 through 573. Please see the spreadsheet provided on the enclosed CD for the expenses incurred in the O&M of Idaho Power's transmission facilities for the time period 2015 through 2017. Idaho Power does not track O&M specifically for 138 kV and 161 kV transmission lines.

d. The data provided in response to subparts a-c are included in Line 13 “Total Transmission O&M Expense” of the attachment provided with the Company’s response to REC’s Request for Production No. 2.2.

e. Expenses are recorded to the following accounts in the FERC system of accounts:

Transmission Expenses

Operation

- 560 Operation supervision and engineering
- 561.1 Load dispatch–Reliability
- 561.2 Load dispatch–Monitor and operate transmission system
- 561.3 Load dispatch–Transmission service and scheduling
- 561.4 Scheduling, system control and dispatch services
- 561.5 Reliability planning and standards development
- 561.6 Transmission service studies
- 561.7 Generation interconnection studies
- 561.8 Reliability planning and standards development services
- 562 Station expenses (Major only)
- 562.1 Operation of Energy Storage Equipment
- 563 Overhead line expense (Major only)
- 564 Underground line expenses (Major only)
- 566 Miscellaneous transmission expenses (Major only)
- 567 Rents
- 567.1 Operation supplies and expenses (Nonmajor only)

Maintenance

- 568 Maintenance supervision and engineering (Major only)
- 569 Maintenance of structures (Major only)
- 569.1 Maintenance of computer hardware
- 569.2 Maintenance of computer software
- 569.3 Maintenance of communication equipment
- 569.4 Maintenance of miscellaneous regional transmission plant
- 570 Maintenance of station equipment (Major only)
- 570.1 Maintenance of Energy Storage Equipment
- 571 Maintenance of overhead lines (Major only)
- 572 Maintenance of underground lines (Major only)
- 573 Maintenance of miscellaneous transmission plant (Major only)
- 574 Maintenance of transmission plant (Nonmajor only)

The following link to the Code of Federal Regulations provides a detailed description of the type of expenses recorded to the above FERC accounts:

<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=0ae8a08d6e1697b03b739910eaa5ce06&mc=true&r=PART&n=pt18.1.101>.

f-h. Idaho Power does not separately track O&M charges in such a manner. Please see the Company's response to REC's Request for Production No. 1.11.

The response to this Request is sponsored by Aubrae Sloan, Accounting Manager, Idaho Power Company, and Mark Annis, Senior Regulatory Analyst, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.10: For each value Idaho Power provided in response to REC's Request for Production No. 1.2 in Attachment 1, please provide an itemization of all the expenses that are included within that value.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.10: Idaho Power is unable to provide itemized expenses for the 1989 timeframe as they no longer exist.

The response to this Request is sponsored by Aubrae Sloan, Accounting Manager, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.11: For each of the categories listed in the attachment to Idaho Power's response to REC's Request for Production No. 1.10, please detail what kinds of facilities are included are included in that category and the dollar value.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.11: Please see the attachment provided with the Company's response to Staff's Request No. 13, column F, for a description of the amounts included in each line of the attachment provided with the Company's response to REC's Request for Production 1.10. The following link to the Code of Federal Regulations provides detailed descriptions of the types of facilities and types of expenses included in each category:

<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=0ae8a08d6e1697b03b739910eaa5ce06&mc=true&r=PART&n=pt18.1.101>.

The response to this Request is sponsored by Mark Annis, Senior Regulatory Analyst, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.12: Please list the types of facilities (poles, wires, meters, etc.) that Idaho Power uses in its distribution (below 138 kV) system. For each facility type, please provide:

- a. The total capital cost for all facilities of that type
- b. The percentage of the capital cost to the total capital cost for the distribution system
- c. The portion of the capital cost for all facilities of that type that are constructed pursuant to an interconnection agreement governed by and subject to the Schedule 72 O&M fees
- d. The percentage of the value produced in response to 2.12(c) to the total for all facilities are constructed pursuant to an interconnection agreement governed by and subject to the Schedule 72 O&M fees

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.12: In response to subparts a and b, the following table provides the total capital cost and associated percentage of the Company's facilities classified as distribution as of December 31, 2017:

Account	Account Description	12/31/2017 Balance	Percentage
360	Land and Land Rights	\$ 6,052,619.68	0.35%
361	Structures and Improvements	37,463,373.49	2.19%
362	Station Equipment	237,332,108.55	13.88%
364	Poles, Towers and Fixtures	265,381,383.03	15.52%
365	Overhead Conductors, Devices	136,069,937.48	7.96%
366	Underground Conduit	50,759,070.08	2.97%
367	Underground Conductors, Devices	258,499,754.18	15.12%
368	Line Transformers	560,033,827.33	32.75%
369	Services	60,786,068.28	3.55%
370	Meters	90,021,167.68	5.26%
371	Installations, Cust Premises	3,057,356.02	0.18%
373	Street Lighting, Signal System	4,526,920.85	0.26%
374	Asset Retirement Cost-Dist Plt	142,630.04	0.01%
Total Distribution Plant		\$ 1,710,126,216.69	

Please note that Idaho Power's transmission assets include some line assets that are operated at less than 138 kV. The value of those transmission assets is included within the Company's response to REC's Request for Production No. 2.13.

Regarding subparts c and d, all capital costs associated with QF interconnection facilities are to be reimbursed by the project when initially constructed, so those facilities are recorded at net zero cost and thus not included in the response to subparts a and b. Any remaining unreimbursed original facilities construction costs and any capital expenditure to replace these facilities are deemed a part of Idaho Power's plant, the same as any other plant that is not customer funded and is not uniquely identified or tracked in the Company's accounting records.

The response to this Request is sponsored by Donna Wheeler, Finance Team Leader, Idaho Power Company, and Aubrae Sloan, Accounting Manager, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.13: Please list the types of facilities (poles, wires, meters, etc.) that Idaho Power uses in its transmission (138 kV and 161 kV) system. For each facility type, please provide:

- a. The total capital cost for all facilities of that type
- b. The percentage of the capital cost to the total capital cost for the transmission system
- c. The portion of the capital cost for all facilities of that type that are constructed pursuant to an interconnection agreement governed by and subject to the Schedule 72 O&M fees
- d. The percentage of the value produced in response to 2.13(c) to the total for all facilities are constructed pursuant to an interconnection agreement governed by and subject to the Schedule 72 O&M fees

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.13: In response to subparts a and b, the following table provides the total capital cost and associated percentage of the Company's facilities classified as transmission as of December 31, 2017:

Account	Account Description	12/31/2017 Balance	Percentage
350	Land and Land Rights	\$37,127,446.32	3.19%
352	Structures and Improvements	80,263,617.42	6.90%
353	Station Equipment	428,949,668.65	36.88%
354	Towers and Fixtures	206,552,728.83	17.76%
355	Poles and Fixtures	183,335,656.95	15.76%
356	Overhead Conductors, Devices	226,621,105.58	19.48%
359	Roads and Trails	390,266.18	0.03%
Total Transmission Plant		\$ 1,163,240,489.93	

Please note that Idaho Power's transmission assets also include line assets that are operated at less than 138 kV and at above 161 kV. The value of those transmission assets is included within the table above.

Regarding subparts c and d, all capital costs associated with QF interconnection facilities are to be reimbursed by the project when initially constructed, so those facilities are recorded at net zero cost and thus not included in the response to subparts a and b. Any remaining unreimbursed original facilities construction costs and any capital expenditure to replace these facilities are deemed a part of Idaho Power's plant, the same as any other plant that is not customer funded and is not uniquely identified or tracked in the Company's accounting records.

The response to this Request is sponsored by Donna Wheeler, Finance Team Leader, Idaho Power Company, and Aubrae Sloan, Accounting Manager, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.14: What is the average age of all of Idaho Power's distribution facilities?

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.14: The Company periodically engages a depreciation consultant to study and review its plant records for the purpose of preparing and proposing updated depreciation rates that reflect analysis of historical plant activity, management's practice and outlook of plant operations, and current practice in the electric industry. The Company's most recent depreciation study was performed by Gannett Flemming using Idaho Power's available plant data as of December 31, 2015. The complete depreciation study, as prepared and proposed by Gannett Flemming, is available at:

<http://www.puc.idaho.gov/fileroom/cases/elec/IPC/IPCE1623/company/20161021SPANOS%20EXHIBIT%202%20-%202015%20DEPRECIATION%20STUDY.PDF>.

The depreciation study results provide a summary table that includes a calculated annual Composite Remaining Life value based upon Future Accruals divided by the Calculated Annual Accrual Amount for each plant account studied. The Composite Remaining Life values that are reflective of the approved depreciation rates provided for in the Idaho Public Utilities Commission's Order No. 33770 related to the Company's distribution facilities, subject to the study, are included in the table below:

Account	DISTRIBUTION PLANT	COMPOSITE REMAINING LIFE
361.00	STRUCTURES AND IMPROVEMENTS	54.4
362.00	STATION EQUIPMENT	42.9
364.00	POLES, TOWERS AND FIXTURES	44.1
365.00	OVERHEAD CONDUCTORS AND DEVICES	34.4
366.00	UNDERGROUND CONDUIT	49.1
367.00	UNDERGROUND CONDUCTORS AND DEVICES	39.4

<u>Account</u>	DISTRIBUTION PLANT	COMPOSITE REMAINING LIFE
368.00	LINE TRANSFORMERS	34.8
369.00	SERVICES	43.4
370.00	METERS	25.7
370.10	METERS - AMI	14.0
371.20	INSTALLATION ON CUSTOMER PREMISES	14.7
373.20	STREET LIGHTING AND SIGNAL SYSTEMS	29.0

The response to this Request is sponsored by Donna Wheeler, Finance Team Leader, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.15: What is the average age of the distribution facilities constructed pursuant to an interconnection agreement governed by and subject to the Schedule 72 O&M fees?

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.15: First energy dates, which approximates the completion of construction, have been included in the information provided in the Company's response to REC's Request for Production No. 2.6. The first energy date can be used to derive the average age of the distribution facilities.

The response to this Request is sponsored by Aubrae Sloan, Accounting Manager, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.16: What is the average age of all of Idaho Power's transmission facilities?

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.16: The Company periodically engages a depreciation consultant to study and review its plant records for the purpose of preparing and proposing updated depreciation rates that reflect analysis of historical plant activity, management's practice and outlook of plant operations, and current practice in the electric industry. The Company's most recent depreciation study was performed by Gannett Flemming using Idaho Power's available plant data as of December 31, 2015. The complete depreciation study, as prepared and proposed by Gannett Flemming, is available at:

<http://www.puc.idaho.gov/fileroom/cases/elec/IPC/IPCE1623/company/20161021SPANOS%20EXHIBIT%202%20-%202015%20DEPRECIATION%20STUDY.PDF>.

The depreciation study results provide a summary table that includes a calculated annual Composite Remaining Life value based upon Future Accruals divided by the Calculated Annual Accrual Amount for each plant account studied. The Composite Remaining Life values that are reflective of the approved depreciation rates provided for in the Idaho Public Utilities Commission's Order No. 33770 related to the Company's transmission facilities, subject to the study, are included in the table below:

Account	DISTRIBUTION PLANT	COMPOSITE REMAINING LIFE
350.20	LAND RIGHTS AND EASEMENTS	85.2
352.00	STRUCTURES AND IMPROVEMENTS	53.2
353.00	STATION EQUIPMENT	42.0
354.00	TOWERS AND FIXTURES	71.1
355.00	POLES AND FIXTURES	53.9
356.00	OVERHEAD CONDUCTORS AND DEVICES	62.3

<u>Account</u>	DISTRIBUTION PLANT	COMPOSITE REMAINING LIFE
359.00	ROADS AND TRAILS	<u>33.3</u>

The response to this Request is sponsored by Donna Wheeler, Finance Team Leader, Idaho Power Company.

REQUEST FOR PRODUCTION NO. 2.17: What is the average age of the transmission facilities constructed pursuant to an interconnection agreement governed by and subject to the Schedule 72 O&M fees?

RESPONSE TO REQUEST FOR PRODUCTION NO. 2.17: First energy dates, which approximates the completion of construction, have been included in the information provided in the Company's response to REC's Request for Production No. 2.6. The first energy date can be used to derive the average age of the transmission facilities.

The response to this Request is sponsored by Aubrae Sloan, Accounting Manager, Idaho Power Company.

DATED at Boise, Idaho, this 31st day of July 2018.



DONOVAN E. WALKER
Attorney for Idaho Power Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 31st day of July 2018 I served a true and correct copy of IDAHO POWER COMPANY'S RESPONSE TO RENEWABLE ENERGY COALITION'S SECOND REQUEST FOR PRODUCTION upon the following named parties by the method indicated below, and addressed to the following:

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