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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 J.R. SIMPLOT
PERFORMANCE BAND AND	)	COMPANY'S THIRD SET OF
CALCULATION OF OPERATION AND	)	REQUESTS FOR PRODUCTION
MAINTENANCE CHARGES FOR PURPA	)	
QUALIFYING FACILITIES	)	
_____	)	

COMES NOW, Idaho Power Company ("Idaho Power" or "Company"), and in response to J.R. Simplot Company's Third Set of Requests for Production to Idaho Power Company dated June 13, 2018, herewith submits the following information:

**PRODUCTION REQUEST NO. 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.

**RESPONSE TO PRODUCTION REQUEST NO. 23:** Idaho Power is not aware of any Federal Energy Regulatory Commission ("FERC") documents, or Idaho Power filings with FERC, specifically addressing a method of calculating operation and maintenance charges to interconnection customers under either the small generator interconnection agreement ("SGIA") or large generator interconnection agreement ("LGIA"). Neither the SGIA nor the LGIA contain methods of calculating operation and maintenance charges. See Idaho Power's answer to J.R. Simplot Company's ("Simplot") Interrogatory No. 13 subparts (ii) and (iii). The *pro forma* SGIA and LGIA were approved by FERC as part of Idaho Power's Open Access Transmission Tariff ("OATT"), which was part of the process from FERC Order Nos. 888, 2003, etc. FERC orders and dockets are publicly available to search via FERC's website.

The response to this Production Request is sponsored by Jeremiah Creason, Operations Analyst II, Idaho Power Company.

**PRODUCTION REQUEST NO. 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.

**RESPONSE TO PRODUCTION REQUEST NO. 24:** Please see Idaho Power's response to Simplot's Production Request No. 23.

The response to this Production Request is sponsored by Jeremiah Creason, Operations Analyst II, Idaho Power Company.

**PRODUCTION REQUEST NO. 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.

**RESPONSE TO PRODUCTION REQUEST NO. 25:** The *pro forma* SGIA and LGIA are both publicly available as part of Idaho Power's OATT via the Company's Open Access Same-Time Information System ("OASIS") website, as are the Company's small and large generator interconnection procedures (SGIP and LGIP). Beyond what is set forth in the OATT, Idaho Power is not aware of any other specific information regarding methods of calculating operation and maintenance charges that is available on the OASIS website.

The response to this Production Request is sponsored by Jeremiah Creason, Operations Analyst II, Idaho Power Company.

DATED at Boise, Idaho, this 3<sup>rd</sup> day of July 2018.



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DONOVAN E. WALKER  
Attorney for Idaho Power Company

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3<sup>rd</sup> day of July 2018 I served a true and correct copy of IDAHO POWER COMPANY'S RESPONSE TO J.R. SIMPLOT COMPANY'S THIRD SET OF REQUESTS FOR PRODUCTION upon the following named parties by the method indicated below, and addressed to the following:

### **Commission Staff**

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### **Idahydro and Shorock Hydro, Inc.**

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