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Attorneys for Petitioners, Idahydro and Shorock Hydro, Inc.

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)	IDAHYDRO AND SHOROCK
MODIFICATION OF THE 90/110)	HYDRO, INC.'S FIRST SET OF
PERFORMANCE BAND AND)	INTERROGATORIES, REQUESTS
CALCULATION OF OPERATION AND)	FOR ADMISSION AND REQUESTS
MAINTENANCE CHARGES FOR PURPA)	FOR PRODUCTION OF
QUALIFYING FACILITIES)	DOCUMENTS TO IDAHO POWER
)	COMPANY
)	

Pursuant to Rule 225 of the Rules of Procedure of the Idaho Public Utilities Commission (the "IPUC" or "Commission"), Idahydro and Shorock Hydro, Inc., ("Petitioners") by and through their counsel of record, C. Tom Arkoosh of Arkoosh Law Offices and David H. Arkoosh of Law Office of David Arkoosh, hereby request that Idaho Power Company ("Idaho Power" or the "Company") provide responses to the following interrogatories, requests for admission and production requests.

DEFINITIONS

Unless otherwise specified in an individual request, the following words have the following meanings in these interrogatories, requests for admission and production requests:

1. “Documents” refers to all writings and records of every type in your possession, control, or custody, whether or not claimed to be privileged or otherwise excludable from discovery, including but not limited to: testimony and exhibits, memoranda, papers, correspondence, letters, reports (including drafts, preliminary, intermediate, and final reports), surveys, analyses, studies (including economic and market studies), summaries, comparisons, tabulations, bills, invoices, statements of services rendered, charts, books, pamphlets, photographs, maps, bulletins, corporate or other minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, microfiche, computer data (including E-mail), computer files, computer tapes, computer inputs, computer outputs and printouts, vouchers, accounting statements, budgets, work papers, engineering diagrams (including “one-line” diagrams), mechanical and electrical recordings, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical, or otherwise, and drafts of any of the above.

“Documents” includes copies of documents, where the originals are not in your possession, custody or control.

“Documents” includes every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy.

“Documents” also includes any attachments or appendices to any document.

2. “Identification” and “identify” mean:

When used with respect to a document, stating the nature of the document (e.g., letter,

memorandum, minutes); the date, if any, appearing thereon; the date, if known, on which the document was prepared; the title of the document; the general subject matter of the document; the number of pages comprising the document; the identity of each person who wrote, dictated, or otherwise participated in the preparation of the document; the identity of each person who signed or initiated the document; the identity of each person to whom the document was addressed; the identity of each person who received the document or reviewed it; the location of the document; and the identity of each person having possession, custody, or control of the document.

When used with respect to a person, stating his or her full name; his or her most recently known home and business addresses and telephone numbers; his or her present title and position; and his or her present and prior connections or associations with any participant or party to this proceeding.

3. "Idaho Power Company" and "the Company" and "Idaho Power" refer to Idaho Power Company, any affiliated company, or any officer, director or employee of Idaho Power Company or any affiliated company.
4. "You" refers to Idaho Power Company.
5. "Person" refers to, without limiting the generality of its meaning, every natural person, corporation, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or organization.
6. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular, whenever appropriate in order to bring within the scope of this discovery request any information or documents which might otherwise be

considered to be beyond their scope.

7. "O&M" charges are the operation and maintenance of interconnection charges identified in Idaho Power Company's Schedule 72.
8. "PURPA" is the federal Public Utilities and Regulatory Policy Act of 1978.
9. "Projects" means Petitioner's projects specifically identified in footnote 1.¹

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1: Please admit the purpose of charges by you under Schedule 72 for O&M is to reimburse you for the cost to you of the actual cost to you of the operation and maintenance of interconnection facilities of PURPA projects.

INTERROGATORIES

INTERROGATORY NO. 1: If you denied RFA 1, please define exactly what is the purpose of the O&M charges.

INTERROGATORY NO. 2: Please identify how you calculated the O&M charges.

INTERROGATORY NO. 3: Please identify how the O&M charges correspond to actual cost to you of operation and maintenance of PURPA interconnection facilities.

INTERROGATORY NO. 4: Please define "original interconnection investment" and what components are incorporated in original interconnection investment as the phrase is used in Schedule 72.

INTERROGATORY NO. 5: Because "original interconnection investment" is the multiplicand in the calculation of O&M, please identify how each component of "original interconnection investment" identified in Interrogatory 4 relates to the actual cost to you of operation and maintenance of interconnection facilities.

¹ List of Projects: Please see **Exhibit A**.

INTERROGATORY NO. 6: Please identify how you track or account for both payments taken in for O&M and actual cost to you for O&M.

INTERROGATORY NO. 7: For each Project since its inception, please identify for each project all payments made to you by the Projects for O&M by year and all costs expended by you for each Project for O&M by corresponding year.

INTERROGATORY NO. 8: For all PURPA projects since 1978, inclusive of the Projects, please identify the sum of all payments made for O&M by all PURPA projects inclusive of the Projects by year and all costs expended by you for all PURPA projects inclusive of the Projects for O&M by corresponding year.

INTERROGATORY NO. 9: Does any prohibition or impediment exist preventing or inhibiting you from charging actual O&M costs as they occur? If so, please identify those prohibitions or impediments.

INTERROGATORY NO. 10: Please identify those persons in your company with actual knowledge which will either support or contradict your answers to this discovery.

INTERROGATORY NO. 11: Please identify those persons in your company whom you will identify at this time to depose in an I.R.C.P. Rule 30(b)(6) deposition to discuss each issue presented by this discovery.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1: Please identify and produce all documents which track or account for both payments taken in by you for O&M of the Projects and the actual cost to you for O&M of the Projects.

REQUEST FOR PRODUCTION NO. 2: Please identify and produce those documents in your possession or control or to which you have access which will support or contradict your answers to this discovery.

DATED this 23rd day of May, 2018.

ARKOOSH LAW OFFICES



C. Tom Arkoosh
Attorney for Idahydro & Shorock Hydro, Inc.

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 23rd day of May, 2018, I served a true and correct copy of the foregoing document(s) upon the following person(s), in the manner indicated:

Diane Hanian	_____	U.S. Mail, Postage Prepaid
Commission Secretary	_____	Overnight Courier
Idaho Public Utilities Commission	_____	Hand Delivered
472 W. Washington	_____	Via Facsimile
Boise, ID 83702	<u> X </u>	E-mail diane.holt@puc.idaho.gov

Donovan Walker	_____	U.S. Mail, Postage Prepaid
Idaho Power Company	_____	Overnight Courier
PO Box 70	_____	Hand Delivered
Boise, ID 83707	_____	Via Facsimile
	<u> X </u>	E-mail dwalker@idahopower.com

Irion Sanger	_____	U.S. Mail, Postage Prepaid
Sanger Law, P.C.	_____	Overnight Courier
1117 SE 53 rd Avenue	_____	Hand Delivered
Portland, OR 97215	_____	Via Facsimile
	<u> X </u>	E-mail irion@sanger-law.com

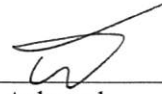
J. Kahle Becker	_____	U.S. Mail, Postage Prepaid
Attorney at Law	_____	Overnight Courier
223 North 6 th Street, #325	_____	Hand Delivered
Boise, ID 83702	_____	Via Facsimile
	<u> X </u>	E-mail kahle@kahlebeckerlaw.com

Peter J. Richardson	_____	U.S. Mail, Postage Prepaid
Gregory M. Adams	_____	Overnight Courier
Richardson Adams, PLLC	_____	Hand Delivered
515 N. 27 th Street	_____	Via Facsimile
Boise, ID 83702	<u> X </u>	E-mail peter@richardsonadams.com
		greg@richardsonadams.com

Edith Pacillo	_____	U.S. Mail, Postage Prepaid
Idaho Public Utilities Commission	_____	Overnight Courier
472 W. Washington	_____	Hand Delivered
Boise, ID 83702	_____	Via Facsimile
	<u> X </u>	E-mail edithpacillo@puc.idaho.gov

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C. Tom Arkoosh

EXHIBIT A

(List of Projects)

Bypass
Hazelton A
Hazelton B
Wilson Lake
Hd. Of U
Low Line Midway
Low Line #2
South Forks
Birch Power
Dry Creek
Pancheri
Lemhi
Marsh Valley
St. Anthony
Rock Creek Joint Venture
Shorock Hydro
Lateral No. 10
Briggs Creek
BC Hydro – Kaster Riverview
HK Hydro – Mud Creek
Crystal Springs Hydro
Mink Creek
Little Wood #1
Little Wood #2
Marco
Koyle Hydro
GeoBon II
Little Mac
Dietrick Drop
Barber Dam
Elk Creek
Rock Creek #2