

**BEFORE THE IDAHO PUBLIC UTILITY COMMISSION**

IN THE MATTER OF PETITION OF	)	
IDAHYDRO, SHOROCK HYDRO, INC.,	)	
J.R. SIMPLOT COMPANY, AND	)	Case No. IPC-E-18-07
RENEWABLE ENERGY COALITION FOR	)	
MODIFICATION OF THE 901110	)	RENEWABLE ENERGY COALITION’S
PERFORMANCE BAND AND	)	FIRST REQUEST FOR PRODUCTION
CALCULATION OF OPERATION AND	)	TO AVISTA
MAINTENANCE CHARGES FOR PURPA	)	
QUALIFYING FACILITIES	)	
_____	)	

Dated: July 6, 2018

I. DEFINITIONS

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, workpapers, 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, corporate 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. “Avista” refers to Avista Corporation, Washington Water Power, any affiliated company, or any officer, director or employee of Avista, or any affiliated company.
4. “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.
5. “Studies” or “study” includes, without limitation, reports, reviews, analyses and audits.
6. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of this discovery any information or documents which might otherwise be considered to be beyond their scope.
7. 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.

## II. INSTRUCTIONS

1. These requests call for all information, including information contained in documents, which relate to the subject matter of the Request and which is known or available to you.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. The time period encompassed by these Requests is from 2002 to the present unless otherwise specified.
4. Each response should be furnished on a separate page. In addition to hard copy, electronic versions of the document, including studies and analyses, must also be furnished if available.

5. If you cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why you cannot answer the Request in full, and state what information or knowledge you have concerning the unanswered portions.
6. If, in answering any of these Requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the Request.
7. If a document requested is unavailable, identify the document, describe in detail the reasons the document is unavailable, state where the document can be obtained, and specify the number of pages it contains.
8. If you assert that any document has been destroyed, state when and why it was destroyed and identify the person who directed the destruction. If the document was destroyed pursuant to your document destruction program, identify and produce a copy of the guideline, policy, or company manual describing such document destruction program.
9. If you refuse to respond to any Request by reason of a claim of privilege, confidentiality, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document, and specify the number of pages it contains. Please provide: (a) a brief description of the document; (b) date of document; (c) name of each author or preparer; (d) name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis for withholding it.
10. Identify the person from whom the information and documents supplied in response to each Request were obtained, the person who prepared each response, the person who reviewed each response, and the person who will bear ultimate responsibility for the truth of each response.
11. If no document is responsive to a Request that calls for a document, then so state.
12. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
13. Whenever these Requests specifically request an answer rather than the identification of documents, the answer is required and the production of documents in lieu thereof will not substitute for an answer.
14. Wherever these requests ask for a formula, if the formula is contained in an excel or other workbook please provide an electronic copy of the workbook with all formulas intact.

15. Wherever these requests ask for a specific number or input for a formula, Avista may respond by providing the underlying documents that contain the specific number or input with an explanation of where the requested information can be found.
16. To the extent that the Company believes it is burdensome to produce specific information requested, please contact REC to discuss the problem prior to filing an answer objecting on that basis to determine if the request can be modified to pose less difficulty in responding.
17. To the extent the Company objects to any of the requests please contact REC to determine if the request can be modified to produce a less objectionable request.

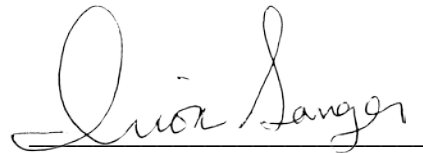
### III. FIRST REQUEST FOR PRODUCTION:

- 1.1 Please provide copies of Avista's responses to all other parties requests for production of documents. This is an ongoing request.
- 1.2 Please provide the methodology that Avista uses to calculate and charge qualifying facilities ("QFs") for operations and maintenance ("O&M") expenses for the QF's interconnection facilities.
- 1.3 Please provide the methodology that Avista uses to calculate and charge all non-QF generators for O&M expenses for the generator's interconnection facilities.
- 1.4 In order No. 24025, the Idaho Public Utility Commission ("IPUC") approved O&M charges to be paid by QFs to Idaho Power Company on QF-provided, utility-owned interconnection facilities as set forth in Idaho Power's Schedule 72. In that order, it was noted that Idaho Power's methodology was "a common methodology used by other Idaho and northwest utilities, with the exception of Washington Water Power Company." Since Avista is the successor to Washington Water Power Company, please provide the methodology that Washington Water Power Company used at the time Order No. 24025 came out on December 1, 1991, if known.
- 1.5 Does Avista have a Schedule approved by the IPUC that governs Interconnections to Non-Utility Generation that is akin to Idaho Power's Schedule 72. If so, please provide the most recent version of this Schedule.
- 1.6 Does Avista charge O&M expenses to QFs for the operation and maintenance of interconnection facilities that were constructed under a prior agreement? If so, please describe the methodology.
- 1.7 When a QF or other electricity generator that historically operated under an interconnection agreement with Avista seeks to enter a new interconnection agreement, how does Avista account for prior O&M payments under the new agreement?

- 1.8 At present, what is Avista's current average O&M costs for its distribution and transmission facilities? Please also provide the total O&M costs and total capital costs upon which that average is based and/or any other inputs Avista used to arrive at the average O&M costs.
- 1.9 Please provide a list of all QFs that have an interconnection agreement with Avista. For each facility please provide an accounting of the amount collected by Avista each year for O&M of the interconnection facilities and the actual O&M expenses incurred by Avista each year to operate and maintain the interconnection facilities.
- 1.10 For each electric utility in the Pacific Northwest, please identify whether interconnection O&M costs are recovered through a formula rate, actual costs incurred by the utility, or some other methodology.
- 1.11 Does Avista's O&M charge cover the cost of replacement facilities once the interconnection facilities have reached the end of their useful life? If not, who covers the cost of replacement facilities?
- 1.12 How does Avista charge FERC-Jurisdictional interconnections under its OATT for O&M expenses? Is this the same or different than the methodology used to charge QFs for O&M of QF provided, utility-owned interconnection facilities?
- 1.13 For each QF listed in response to Request for Production No. 1.9, 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)

Dated: July 6, 2018.

SANGER LAW, P.C.



Irion Sanger  
Attorney for Petitioner  
Renewable Energy Coalition

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6th day of July 2018, a true and correct copy of the within and foregoing RENEWABLE ENERGY COALITION'S FIRST REQUEST FOR PRODUCTION TO AVISTA in Case No. IPC-E-18-07 were delivered via electronic mail to the following:

Diane Hanian  
Commission Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
Boise, Idaho 83702  
[Diane.holt@puc.idaho.gov](mailto:Diane.holt@puc.idaho.gov)

Clint Kalich  
Manager, Resource Planning and Analysis  
Avista Corporation  
1411 E. Mission Ave, MSC-7  
Spokane, WA 99202  
[clint.kalich@avistacorp.com](mailto:clint.kalich@avistacorp.com)

Michael G. Andrea  
Senior Counsel, Avista Corporation  
1411 E. Mission Ave, MSC-23  
Spokane, WA 99202  
[Michael.andrea@avistacorp.com](mailto:Michael.andrea@avistacorp.com)

Donovan Walker  
Idaho Power Company  
1221 West Idaho Street  
Boise, Idaho 83702  
[dwalker@idahopower.com](mailto:dwalker@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

Tamarack Energy Partnership  
Michael Cream and Preston Carter  
601 W. Bannock  
Boise, Idaho 83702  
[mcc@givenspursley.com](mailto:mcc@givenspursley.com)  
[pnc@givenspursley.com](mailto:pnc@givenspursley.com)

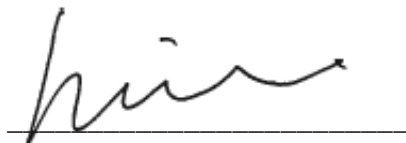
C. Tom Arkoosh  
Arkoosh Law Offices  
P.O. Box 2900  
Boise, Idaho 83701  
[tom.arkoosh@arkoosh.com](mailto:tom.arkoosh@arkoosh.com)

Peter J. Richardson  
Gregory M. Adams  
Richardson Adams, PLLC  
P.O. Box 7218  
515 N. 276 Street  
Boise, ID 83702  
[peter@richardsonadams.com](mailto:peter@richardsonadams.com)  
[greg@richardsonadams.com](mailto:greg@richardsonadams.com)

J. Kahle Becker  
223 North 6th St, #325  
Boise, Idaho 83702  
[kahle@kahlebeckerlaw.com](mailto:kahle@kahlebeckerlaw.com)

David H. Arkoosh  
Law Office of David Arkoosh  
PO Box 2817  
Boise, ID 83701  
[david@arkooshlaw.com](mailto:david@arkooshlaw.com)

Edith Pacillo  
Deputy Attorney General  
Idaho Public Utilities Commission  
472 W. Washington (83702)  
PO Box 83720  
Boise, ID 83720-0074  
[edith.pacillo@puc.idaho.gov](mailto:edith.pacillo@puc.idaho.gov)



Min Hu