

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)	SECOND REQUEST FOR
CALCULATION OF OPERATION AND)	PRODUCTION
MAINTENANCE CHARGES FOR PURPA)	TO IDAHO POWER
QUALIFYING FACILITIES)	
_____)	

Dated: July 10, 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. “Idaho Power” refers to Idaho Power Company, any affiliated company, or any officer, director or employee of Idaho Power, 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, Idaho Power 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. SECOND REQUEST FOR PRODUCTION:

- 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.
- 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.
- 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?
- 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?
- 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?
- 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)
- 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.
- 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

- 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
- 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.
- 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.
- 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
- 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
- 2.14 What is the average age of all of Idaho Power's distribution facilities?
- 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?
- 2.16 What is the average age of all of Idaho Power's transmission facilities?
- 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?