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Attorneys for Petitioner J.R. Simplot Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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|--------------------------------|---|--------------------------------------|
| 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 |) | J.R. SIMPLOT COMPANY'S SECOND |
| MODIFICATION OF THE 90/110 |) | SET OF REQUESTS FOR |
| PERFORMANCE BAND AND |) | PRODUCTION TO IDAHO POWER |
| CALCULATION OF OPERATION AND |) | COMPANY |
| MAINTENANCE CHARGES FOR PURPA |) | |
| QUALIFYING FACILITIES |) | |

Pursuant to Rule 225 of the Rules of Procedure of the Idaho Public Utilities Commission (the "IPUC" or "Commission"), the J.R. Simplot Company ("Simplot") by and through its attorneys of record, Gregory M. Adams and Peter J. Richardson, hereby requests that Idaho Power Company ("Idaho Power" or the "Company") provide responses to the following discovery requests. Please use the definitions and instructions supplied with the J.R. Simplot Company's First Set of Interrogatories, Requests for Admission, and Requests for Production.

SECOND REQUESTS FOR PRODUCTION

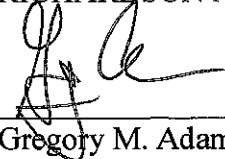
Production Request 21: Please provide Idaho Power's monthly system load (in MWh) in Excel spreadsheet format for each month from January 2008 through the most recent month available.

Production Request 22: Please provide Idaho Power's system load for each hour (in MWh) in Excel spreadsheet format for the three years preceding the date of production requests

12, 13, and 14, i.e. the same dates as used for the data supplied in response to those production requests.

Dated: April 30, 2018.

RICHARDSON ADAMS, P.L.L.C.

A handwritten signature in black ink, appearing to read 'G. Adams', written over a horizontal line.

Gregory M. Adams, ISB No. 7454
Attorneys for Petitioner J.R. Simplot
Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of April 2018, a true and correct copy of the within and foregoing SECOND SET OF REQUESTS FOR PRODUCTION of the J.R. Simplot Company to Idaho Power Company in Case No. IPC-E-18-07 were delivered via electronic mail to the following:


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