

Peter J. Richardson, ISB No. 3195
 Gregory M. Adams, ISB No. 7454
 RICHARDSON ADAMS, P.L.L.C.
 515 N. 27th Street
 Boise, ID 83702
 Telephone: (208) 938-2236
 Facsimile: (208) 938-7904
 Email: peter@richardsonadams.com
 Email: greg@richardsonadams.com

Attorneys for Petitioner J.R. Simplot Company

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)	J.R. SIMPLOT COMPANY'S FIRST
MODIFICATION OF THE 90/110)	INTERROGATORIES, REQUESTS
PERFORMANCE BAND AND)	FOR ADMISSION AND REQUESTS
CALCULATION OF OPERATION AND)	FOR PRODUCTION TO IDAHO
MAINTENANCE CHARGES FOR PURPA)	POWER COMPANY
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 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. The term "monthly adjusted estimated net energy amounts" means the estimate of monthly estimated net energy deliveries as adjusted by the qualifying facility under the terms of the qualifying facility's energy sales agreement with Idaho Power for purposes of implementing the Commission-approved 90/100 Performance Band.
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. "Studies" or "study" includes, without limitation, reports, reviews, analyses and audits.
7. 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.
8. 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.
9. "Work papers" means documents that show the source, calculations, and details supporting the material referenced.

INSTRUCTIONS

1. These interrogatories, requests for admission and production requests call for all information, including information contained in documents, which relate to the subject

matter of the interrogatories, requests for admission and production requests and which is known or available to you.

2. Where an interrogatory, request for admission or production 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 an interrogatory, request for admission or production request should clearly indicate the subdivision, part, or portion to which it is directed.
3. Each response should be furnished on a separate page. Electronic versions of the document, including studies and analyses, must be furnished if available.
4. If you cannot answer any of these interrogatories, requests for admission and production requests 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 in full, and state what information or knowledge you have concerning the unanswered portions.
5. If, in answering any of these interrogatories, requests for admission and production 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 interrogatories, requests for admission and production requests.
6. 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.
7. 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.
8. If you refuse to respond to any interrogatories, requests for admission and production requests 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.
9. Identify the person from whom the information and documents supplied in response to each interrogatory, request for admission and production 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.
 10. If no document is responsive to an interrogatory, request for admission and production request that calls for a document, then so state.
 11. 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.
 12. Whenever these interrogatories, requests for admission and production 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.
 13. To the extent that the Company believes it is burdensome to produce specific information requested, please contact counsel for J.R. Simplot Company 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.
 14. To the extent the Company objects to any of the requests please contact counsel for J.R. Simplot Company to determine if the request can be modified to produce a less objectionable request.

FIRST INTERROGATORIES

Interrogatory 1: Identify the employees at Idaho Power who are responsible for forecasting the output of hydro, wind, solar and other QFs for month-ahead and day-ahead power supply planning purposes. List the employees in descending order of decision-making hierarchy and list the job title of each such employee.

Interrogatory 2: Identify the employees at Idaho Power who are responsible for forecasting the output of Idaho Power's company-owned hydro, wind, solar and other generation projects for month-ahead and day-ahead power supply planning purposes. List the employees in descending order of decision-making hierarchy and list the job title of each such employee.

Interrogatory 3: Identify the employees at Idaho Power who receive the monthly adjusted estimated net energy amounts supplied by QFs with the 90/110 Performance Band contract provision. List the employees in descending order of decision-making hierarchy and list the job title of each such employee.

Interrogatory 4: Identify the employees at Idaho Power engaged in accounting of operations and maintenance expenses and assessment of operation and maintenance charges to interconnection customers that take service under FERC-jurisdictional interconnections under the Open Access Transmission Tariff's Large Generator Interconnection Agreement and Small Generator Interconnection Agreement. List the employees in descending order of decision-making hierarchy and list the job title of each such employee.

Interrogatory 5: Identify the employees at Idaho Power engaged in accounting of operations and maintenance expenses and assessment of operation and maintenance charges to interconnection customers that take service under Schedule 72. List the employees in descending order of decision-making hierarchy and list the job title of each such employee.

Interrogatory 6: Explain how Idaho Power uses the monthly adjusted estimated net energy amounts supplied by QFs under their energy sales agreements in Idaho Power's month-ahead and day-ahead power supply planning activities. Include examples of specific instances where Idaho Power has adjusted its power supply planning based upon the QF's monthly adjusted estimated net energy amounts.

Interrogatory 7: Explain how Idaho Power forecasts the energy deliveries made under ESAs that do not contain the 90/110 Performance Band. Include description of all differences between the practices used to forecast energy deliveries from hydro QFs providing monthly adjusted estimated net energy amounts under the 90/110 Performance Band and hydro QFs that do not provide monthly adjusted estimated net energy amounts under the 90/110 Performance Band.

Interrogatory 8: For intermittent (wind and solar) QFs that operate under a mechanical availability guarantee in lieu of the 90/110 Performance Band, explain how Idaho Power forecasts generation from such QFs without receiving monthly adjusted estimated net energy amounts supplied by the QF.

Interrogatory 9: Explain why Idaho Power does not use the formula-based operation and maintenance charge in Schedule 72 to assess interconnection costs to customers that take service under FERC-jurisdictional interconnections under the Open Access Transmission Tariff's Large Generator Interconnection Agreement and Small Generator Interconnection Agreement.

Interrogatory 10: Is Idaho Power aware of any other utility in the United States that assesses operation and maintenance expenses to interconnection customers based on a formula that assesses a percentage of the initial construction costs similar to the structure of the formula in Schedule 72. If so, please identify the utility, explain the structure of its charge, and location of information available to Idaho Power on this topic.

FIRST REQUESTS FOR ADMISSION

Request for Admission 1: Admit or deny that Idaho Power does not use the monthly adjusted estimated net energy amounts supplied by QFs under their energy sales agreements for purposes of balancing load and resources on its system on a day-ahead basis.

Request for Admission 2: Admit or deny that Idaho Power does not use the monthly adjusted estimated net energy amounts supplied by QFs under their energy sales agreements for purposes of balancing load and resources on its system on a week-ahead basis.

Request for Admission 3: Admit or deny that Idaho Power does not use the monthly adjusted estimated net energy amounts supplied by QFs under their energy sales agreements for purposes of balancing load and resources on its system on a two-week-ahead basis.

Request for Admission 4: Admit or deny that Idaho Power does not use the monthly adjusted estimated net energy amounts supplied by QFs under their energy sales agreements for purposes of power supply planning on its system on a month-ahead basis.

Request for Admission 5: Admit or deny that Idaho Power assesses interconnection operations and maintenance expenses to interconnection customers that take service under FERC-jurisdictional interconnections under the Open Access Transmission Tariff's Large Generator Interconnection Agreement and Small Generator Interconnection Agreement on a basis of actual costs incurred.

Request for Admission 6: Admit or deny that Idaho Power does not assess interconnection operations and maintenance expenses to interconnection customers that take service under FERC-jurisdictional interconnections under the Open Access Transmission Tariff's Large Generator Interconnection Agreement and Small Generator Interconnection Agreement on the basis of the formula contained in Schedule 72.

FIRST REQUESTS FOR PRODUCTION

Production Request 1: Please provide a list of all QFs that supplied power to Idaho Power at any time after January 1, 2008 or that have energy sales agreements but have not yet started to make deliveries. For each of these QFs, please provide the following information: name, contract capacity, nameplate capacity (if known and different than contract capacity), primary fuel (e.g, hydro, wind, solar, geothermal, cogeneration, etc.), point of interconnection, commercial operation date, date of last generation (if not still in operation) and whether the energy sales agreement contains the 90/110 Performance Band.

Production Request 2: Please provide a list of all hydro projects owned by Idaho Power that generated power at any time between January 1, 2008 and the present. For each of these hydro projects, please provide the following information: name, water source (e.g., Snake

River), nameplate capacity, planning capacity (if different than nameplate capacity), water flow at nameplate/planning capacity (in cfs), at site storage (in sfd), upstream storage controlled by Idaho Power (in sfd) and upstream storage controlled by entities other than Idaho Power (in sfd).

Production Request 3: For each QF listed in the response to Production Request 1 whose energy sales agreement contains the 90/110 Performance Band, please provide a copy of the energy sales agreement and any amendments.

Production Request 4: Has Idaho Power allowed any QFs whose energy sales agreements contain the 90/110 Performance Band to adjust their net energy amounts other than as specifically permitted under the express terms of the ESAs and any applicable amendments? If so, please describe the terms allowed for these adjustments and provide any communications with QFs pertaining to these adjustments.

Production Request 5: For each non-wind/non-solar QF listed in the response to Production Request 1, please provide monthly generation (in MWh) in Excel spreadsheet format for each month from January 2008 through the most recent month available.

Production Request 6: For each non-wind/non-solar QF listed in the response to Production Request 1 whose ESA contains the 90/110 Performance Band, please provide the monthly adjusted estimated net energy amounts (in MWh) in Excel spreadsheet format used to determine compliance with the 90/110 Performance Band for each applicable month from January 2008 through the most recent month available.

Production Request 7: For each non-wind/non-solar QF listed in the response to Production Request 1 whose ESA contains the 90/110 Performance Band, please indicate whether the monthly adjusted estimated net energy amounts were below (<90%), within (90-110%) or above (110%) the 90/110 Performance Band for each month from January 2008 through the most recent month available.

Production Request 8: For each wind or solar QF listed in the response to Production Request 1 whose ESA contains the 90/110 Performance Band, please provide monthly generation (in MWh) in Excel spreadsheet format for each month from January 2008 through the most recent month available.

Production Request 9: For each wind or solar QF listed in the response to

Production Request 1 whose ESA contains the 90/110 Performance Band, please provide the monthly adjusted estimated net energy amounts (in MWh) in Excel spreadsheet format used to determine compliance with the 90/110 Performance Band for each applicable month from January 2008 through the most recent month available.

Production Request 10: For each wind or solar QF listed in the response to Production Request 1 whose ESA contains the 90/110 Performance Band, please indicate whether the monthly generation was below (<90%), within (90-110%) or above (110%) the 90/110 Performance Band for each month from January 2008 through the most recent month available.

Production Request 11: For each hydro project owned by Idaho Power, please provide monthly generation (in MWh) for each month from January 2008 through the most recent month available.

Production Request 12: Provide total generation (MWh) of all non-intermittent QFs selling to Idaho Power for each hour for the past 3 years, in excel spreadsheet format. For purposes of this request, “intermittent” means wind or solar powered QF.

Production Request 13: Provide total generation (MWh) of all hydropower QFs selling to Idaho Power for each hour for the past 3 years in excel spreadsheet format.

Production Request 14: Provide total generation (MWh) of all QFs that would be categorized as “other” on Idaho Power’s published rate schedules selling to Idaho Power in for each hour for the past 3 years excel spreadsheet format.

Production Request 15: For each year since 1990, provide: (i) an accounting of the total amount collected by Idaho Power under the Schedule 72 operation and maintenance charges, and (ii) an accounting of the total cost incurred by Idaho Power for operation and maintenance expenses on QF interconnections.

Production Request 16: For each QF project listed in the response to Production Request 1, please provide: (i) the amount collected by Idaho Power for Schedule 72 interconnection O&M charges and (ii) the actual interconnection O&M expenses incurred by Idaho Power for each year that the QF project was in operation.

Production Request 17: Provide an accounting of actual operation and maintenance

costs incurred by Idaho Power for the interconnection facilities used for the QF at the J.R. Simplot Company's Don Plant. For each amount incurred by Idaho Power, please include the date, the work performed, equipment supplied, or description of other expenses, with supporting documents.

Production Request 18: Provide an accounting of all the payments made by the J.R. Simplot Company to Idaho Power under Schedule 72 organized chronologically for each month J.R. Simplot Company has paid Idaho Power under its ESA and/or Schedule 72 for the QF at the J.R. Simplot Company's Don Plant.

Production Request 19: Provide an accounting of actual operation and maintenance costs incurred by Idaho Power for the interconnection facilities used for the QF at the Magic Reservoir Hydroelectric Plant. For each amount incurred by Idaho Power, please include the date, the work performed, equipment supplied, or description of other expenses, with supporting documents.

Production Request 20: Provide an accounting of all the payments made by the Magic Reservoir Hydroelectric to Idaho Power under Schedule 72 organized chronologically for each month under its energy sales agreement and/or Schedule 72 for the QF at the Magic Reservoir Hydroelectric Plant.

Dated: April 25, 2018.

RICHARDSON ADAMS, P.L.L.C.



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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 25th day of April 2018, a true and correct copy of the within and foregoing FIRST SET OF INTERROGATORIES, FIRST REQUESTS FOR ADMISSION, and FIRST REQUESTS FOR PRODUCTION of the J.R. Simplot Company to Idaho Power Company in Case No. IPC-E-18-07 were delivered via U. S. Mail postage prepaid and electronically to the following:

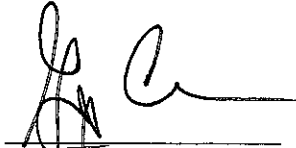
Diane Hanian
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702
diane.holt@puc.idaho.gov

C. Tom Arkoosh
Arkoosh Law Offices
P.O. Box 2900
Boise, Idaho 83701
tom.arkoosh@arkoosh.com

Irion Sanger
Sanger Law, P.C.
1117 SE 53rd Avenue
Portland, Oregon 97215
irion@sanger-law.com

Donovan Walker
Idaho Power Company
P.O. Box 70
Boise, Idaho 83707
dwalker@idahopower.com

J. Kahle Becker
Attorney at Law
223 North 6th Street, #325
Boise, Idaho 83702
kahle@kahlebeckerlaw.com



Gregory M. Adams