

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
MODIFICATION OF THE 90/110)	FOURTH 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.

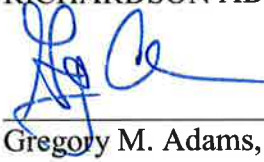
FOURTH REQUESTS FOR PRODUCTION

Production Request 26: Reference Idaho Power's response to Interrogatory No. 2 of J.R. Simplot Company, discussing the monthly Operating Plan, which is used to "derive the preliminary plan for the day" and further updated "based on three-day trending average output from generation resources." Please provide all such monthly Operating Plans, preliminary plans, and updates thereto throughout each month for each of the last 12 months, organized

chronologically by month.

Dated: July 16, 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 16th day of July 2018, a true and correct copy of the within and foregoing J.R. SIMPLOT COMPANY'S FOURTH SET OF PRODUCTION REQUESTS TO IDAHO POWE COMPANY 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

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

Michael G. Andrea
Senior Counsel, Avista Corporation
1411 E. Mission Ave, MSC-23
Spokane, WA 99202
Michael.andrea@avistacorp.com

Donovan Walker
Idaho Power Company
1221 West Idaho Street
Boise, Idaho 83702
dwalker@idahopower.com

Tamarack Energy Partnership
Michael Cream and Preston Carter
601 W. Bannock
Boise, Idaho 83702
mcc@givenspursley.com
pnc@givenspursley.com

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, OR 97215
irion@sanger-law.com

J. Kahle Becker
223 North 6th St, #325
Boise, Idaho 83702
kahle@kahlebeckerlaw.com

David H. Arkoosh
P.O. Box 2817
Boise, Idaho 83701
david@arkooshlaw.com

Edith Pacillo
Edward Jewell
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702
edith.pacillo@puc.idaho.gov
Edward.jewell@puc.idaho.gov



Gregory M. Adams