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UTILITIES COMMISSION

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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)	
IDAHYDRO, SHOROCK HYDRO, INC., J.R.)	CASE NO. IPC-E-18-07
SIMPLIT COMPANY, AND RENEWABLE)	
ENERGY COALITION FOR MODIFICATION)	FIRST PRODUCTION
OF THE 90/110 PERFORMANCE BAND AND)	REQUEST OF THE
CALCULATION OF OPERATION AND)	COMMISSION STAFF TO
MAINTENANCE CHARGES FOR PURPA)	IDAHO POWER COMPANY
<u>QUALIFYING FACILITES.</u>)	

The Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Edith Pacillo, Deputy Attorney General, request that Idaho Power Company (Idaho Power or Company) provide the following documents and information as soon as possible, by **FRIDAY, JUNE 28, 2018.**

This Production Request is continuing, and Idaho Power is requested to provide, by way of supplementary responses, additional documents that it or any person acting on its behalf may later obtain that will augment the documents produced.

Please provide answers to each question and supporting workpapers that provide detail or are the source of information used in calculations. Idaho Power is reminded that responses pursuant to Commission Rules of Procedure must include the name and phone number of the person preparing the document, and the name, location and phone number of the record holder and if different the witness who can sponsor the answer at hearing if need be. IDAPA 31.01.01.228.

In addition to the written copies provided as response to the questions, please provide all Excel and electronic files on CD with formulas activated.

REQUEST NO. 1: Does Idaho Power believe 90/110 contributes to more accurate avoided costs? If so, please explain why. If not, why not?

REQUEST NO. 2: Please explain how the 90/110 contract provision relates to the cost of integrating variable resources.


REQUEST NO. 3: Please explain how the 90/110 contract provision relates to the cost of holding system reserves.

REQUEST NO. 4: Is it practical and feasible to conduct an integration study on hydro QFs on the Idaho Power system?

REQUEST NO. 5: The current monthly operation and maintenance (O&M) service charges for QF interconnection facilities are based upon a percentage of actual interconnection investment: 0.7% for distribution facilities (below 138kV) and 0.4% for transmission facilities (138kV and 161Kv) *See* Case No. IPC-E-90-20. Does Idaho Power believe this methodology is still reasonable and appropriate today? Please explain.

REQUEST NO. 6: Please update the percentages mentioned above (0.7% and 0.4%) used to calculate the current O&M levelized rates by using the most recent input data (i.e. 12 months ending December 31, 2017), and provide worksheets (with formula intact) to show the calculation steps.

Dated at Boise, Idaho, this 7th day of June 2018.


Edith Pacillo
Deputy Attorney General

Technical Staff: Yao Yin (1-6)

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 7th DAY OF JUNE 2018, SERVED THE FOREGOING **FIRST PRODUCTION REQUEST OF THE COMMISSION STAFF TO IDAHO POWER COMPANY**, IN CASE NO. IPC-E-18-07, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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