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IDAHO PUBLIC
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
SIMPLOT 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) J.R. SIMPLOT COMPANY
QUALIFYING FACILITES.)**

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

This Production Request is continuing, and Simplot 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. Simplot 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: The footnote on Page 5 of the Petition lists five circumstances under which the 90/110 rule was adopted. Does the Petitioner agree with any or all of these statements? Please explain.

REQUEST NO. 2: Please provide any data and evidence that supports the three circumstances listed on page 6, paragraph number 13, of the Petition.

REQUEST NO. 3: Please categorize the root causes that prevent QF projects from meeting the 90/110 requirement and provide project examples that fall under each category.

REQUEST NO. 4: Please list the projects that are or should be able to consistently comply with the 90/110 contract provisions. For each project, please provide a detailed explanation why these projects are more predictable and more able to comply with the 90/110 requirements.

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



Edith Pacillo
Deputy Attorney General

Technical Staff: Yao Yin (1-4)

i:umisc:prodreq/ipce18.7epyy prod req1 J.R. Simplot

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 J.R. SIMPLOT COMPANY** IN CASE NO. IPC-E-18-07, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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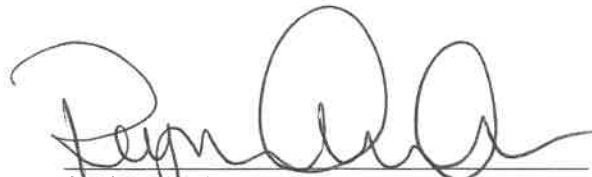
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