

EDITH PACILLO  
DEPUTY ATTORNEY GENERAL  
IDAHO PUBLIC UTILITIES COMMISSION  
PO BOX 83720  
BOISE, IDAHO 83720-0074  
(208) 334-0318  
IDAHO BAR NO. 5430

RECEIVED  
2018 JUL 11 PM 3:40  
IDAHO PUBLIC  
UTILITIES COMMISSION

Street Address for Express Mail:  
472 W. WASHINGTON  
BOISE, IDAHO 83702-5918

Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

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

The Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Edith Pacillo, Deputy Attorney General, request that Renewable Energy Coalition (REC) provide the following documents and information as soon as possible, by **WEDNESDAY, AUGUST 1, 2018.**

This Production Request is continuing, and REC 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. REC 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. 5:** Has the 90/110 performance band restricted access of your members to capital? If so, please provide specific examples.

**REQUEST NO. 6:** How many times have your members' facilities fallen outside the performance band over the duration of their respective power purchase agreements? By how much as a percentage of total months?

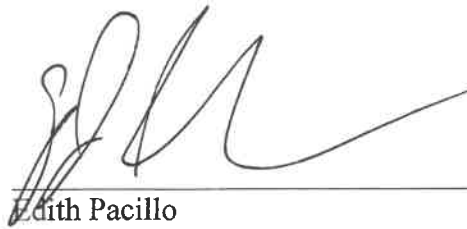
**REQUEST NO. 7:** What sort of expenditure in time and resources does it require of each individual QF subject to the 90/110 performance band to comply with and provide the estimate requirement on a monthly basis?

**REQUEST NO. 8:** What is the reduced dollar difference, over the term of the respective power purchase agreements, your member QFs received because their power sales fell outside the performance band in any given month? What percent is this of their annual gross revenue?

**REQUEST NO. 9:** How does your organization define "firm energy" in regards to QF energy sales in Idaho? How does this definition differ from what your organization considers the industry definition standard of "firm energy?"

**REQUEST NO. 10:** At the time the legally enforceable obligation is incurred, do your member QFs know whether they will receive published avoided costs or Surplus Energy Price for the electricity they sell to the utility?

Dated at Boise, Idaho, this 11<sup>th</sup> day of July 2018.



---

Edith Pacillo  
Deputy Attorney General

i:\umisc:prodreq\ipce18.7epejep prod req2 Renewable Energy Coalition

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 11<sup>th</sup> DAY OF JULY 2018, SERVED THE FOREGOING **SCOND PRODUCTION REQUEST OF THE COMMISSION STAFF TO RENEWABLE ENERGY COALITION** IN CASE NO. IPC-E-18-07, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

DONOVAN WALKER  
LEAD COUNSEL  
IDAHO POWER COMPANY  
PO BOX 70  
BOISE ID 83707-0070  
E-mail: [dwalker@idahopower.com](mailto:dwalker@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

C TOM ARKOOSH  
ARKOOSH LAW OFFICES  
PO BOX 2900  
BOISE ID 83701  
E-mail: [tom.arkoosh@arkoosh.com](mailto:tom.arkoosh@arkoosh.com)

DAVID H ARKOOSH  
LAW OFFICE OF DAVID  
ARKOOSH  
PO BOX 2817  
BOISE ID 83701  
E-mail: [david@arkooshlaw.com](mailto:david@arkooshlaw.com)

PETER J RICHARDSON  
GREGORY M ADAMS  
RICHARSON ADAMS PLLC  
515 N 27<sup>TH</sup> STREET  
BOISE ID 83702  
E-mail: [peter@richardsonadams.com](mailto:peter@richardsonadams.com)  
[greg@richardsonadams.com](mailto:greg@richardsonadams.com)


J KAHLE BECKER  
ATTORNEY AT LAW  
223 N 6<sup>TH</sup> STREET #325  
BOISE ID 83702  
E-mail: [kahle@kahlebeckerlaw.com](mailto:kahle@kahlebeckerlaw.com)

IRION SANGER  
SANGER LAW PC  
1117 SE 53<sup>RD</sup> AVE  
PORTLAND OR 97215  
E-mail: [irion@sanger-law.com](mailto:irion@sanger-law.com)

TAMARACK ENERGY PARTNERSHIP  
c/o MICHAEL C CREAMER  
PRESTON N CARTER  
601 W BANNOCK  
BOISE ID 83702  
E-mail: [mcc@givenspursley.com](mailto:mcc@givenspursley.com)  
[pnc@givenspursley.com](mailto:pnc@givenspursley.com)

MICHAEL G ANDREA  
SENIOR COUNSEL  
AVISTA CORPORATION  
1411 E MISSION AVE, MSC-23  
SPOKANE WA 99202  
E-mail: [michael.andrea@avistacorp.com](mailto:michael.andrea@avistacorp.com)

CLINT KALICH, MANAGER  
RESOURCE PLANNING & ANALYSIS  
AVISTA CORPORATION  
1411 E MISSION AVE, MSC-7  
SPOKANE WA 99202  
E-mail: [clint.kalich@avistacorp.com](mailto:clint.kalich@avistacorp.com)



SECRETARY

CERTIFICATE OF SERVICE