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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
SIMPLOT COMPANY, AND RENEWABLE)
ENERGY COALITION FOR MODIFICATION) SECOND 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 FACILITIES.)**

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 **WEDNESDAY, AUGUST 1, 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. 5: Has the 90/110 performance band restricted your access to capital? If so, please provide specific examples.

REQUEST NO. 6: How many times has your facility fallen outside the performance band over the duration of your power purchase agreement? By how much as a percentage?


REQUEST NO. 7: What sort of expenditure in time and resources does it require 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 your power purchase agreement, you received because your power sales fell outside the performance band in any given month? What percent is this of your annual gross revenue?

REQUEST NO. 9: How do you define “firm energy” in regards to QF energy sales in Idaho? How does this definition differ from what you consider the industry definition standard of “firm energy?”

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

Dated at Boise, Idaho, this 11th day of July 2018.



Edith Pacillo
Deputy Attorney General

i:umisc:prodreq/ipce18.7epejep prod req2 J.R. Simplot

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 11th DAY OF JULY 2018, SERVED THE FOREGOING **SCOND 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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SECRETARY

CERTIFICATE OF SERVICE