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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 )** **THIRD 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**  
**QUALIFYING FACILITES. )**

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, AUGUST 10, 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. 22:** Please provide updated Schedule 72 Operation and Maintenance (O&M) flat percentage rates for both distribution-level and transmission-level interconnections using actual 2015 and 2016 data, respectively. Please provide workpapers reflecting the calculations with formula intact.

**REQUEST NO. 23:** In “Idaho Power Company’s Answer and Responses to Idahohydro and Shorock Hydro, Inc.’s First Set of Interrogatories, Requests for Admission, and Requests for Production of Documents, Idaho Power states in “Answer to Interrogatory No. 9” that “charging actual O&M costs for QF projects would mean that an entirely separate system of work order preparation and billing would have to be established just for QF projects. Idaho Power believes that such a requirement is both unreasonable and unnecessary”. Please answer the following questions:

- a. For purposes of this request, please define “actual O&M costs.”
- b. Please list the categories of costs that go into the O&M rates and provide a description of the types and nature of these costs.
- c. For each O&M cost category, please describe how the Company could track them as actual costs and describe the changes in the Company’s business processes that the Company would need to make.
- d. For each O&M cost category, please describe and roughly quantify investments needed in systems, infrastructure, labor, etc. that the Company would need to make to track them as actual costs.

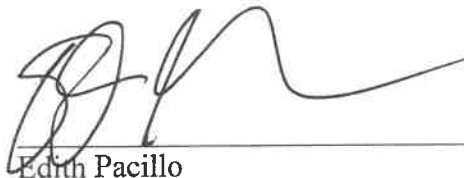
**REQUEST NO. 24:** In “Idahydro, Shorock Hydro, Inc., J.R. Simplot Company and Renewable Energy Coalition’s Petition,” the Petitioners stated on Page 8 that “In fact, IPCo and other Idaho utilities assess actual O&M costs to interconnection customers under interconnections subject to the Federal Power Act...” Please answer the following questions:

- a. Does Idaho Power agree with the statement? Please explain why or why not.
- b. If Idaho Power agrees with the Petitioner’s statement, please list the categories of costs that make up actual O&M costs and describe the overall methodology for assessing actual O&M costs to interconnection customers subject to the Federal Power Act?

**REQUEST NO. 25:** In “Idaho Power’s Answer and Responses to J.R. Simplot’s First Interrogatories, Requests for Admission, and Requests for Production to Idaho Power Company,” Idaho Power stated in its “Answer to Interrogatory No. 9” that for both large generators and small generators “The Interconnection Customer shall be responsible for its share of all reasonable expenses, including overheads associated with (1) owning, operating, maintaining, repairing, and replacing its own Interconnection Facilities; and (2) operating, maintaining, repairing, and replacing the Transmission Provider’s Interconnection Facilities.” Please answer the following questions:

- a. How does Idaho Power charge overheads associated with operating, maintaining, repairing, and replacing the Transmission Provider’s Interconnection Facilities (item 2 above). Please provide specific examples to support your answer.
- b. What is the justification for assessing O&M interconnection costs for QF facilities differently than interconnection customers subject to the Federal Power Act?

Dated at Boise, Idaho, this 20<sup>th</sup> day of July 2018.



Edith Pacillo  
Deputy Attorney General

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 20<sup>th</sup> DAY OF JULY 2018, SERVED THE FOREGOING **THIRD 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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SECRETARY

CERTIFICATE OF SERVICE