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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 ) SHOROCK HYDRO, INC.  
QUALIFYING FACILITIES. )

The Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Edith Pacillo, Deputy Attorney General, request that Shorock Hydro, Inc. (Shorock) provide the following documents and information as soon as possible, by **FRIDAY, AUGUST 10, 2018**.

This Production Request is continuing, and Shorock 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. Shorock 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. 11:** In “Idaho Hydro, Shorock Hydro, Inc., J.R. Simplot Company and Renewable Energy Coalition’s Petition,” the Petitioners state in Paragraph 20 that “...actual O&M costs for QF interconnected interests instructs that annual, percentage-based charges in most, if not all, cases far exceed the actual O&M expenses for QF interconnection facilities, thus indicating that the average O&M on IPCo system-wide transmission and distribution facilities is either inapplicable or inaccurate as a reflection of the cost of O&M actually performed on QF interconnection facilities.” Please answer the following questions:

- a. Please provide evidence that supports “the average O&M on IPCo system-wide transmission and distribution facilities is either inapplicable or inaccurate as a reflection of the cost of O&M actually performed on QF interconnection facilities”.
- b. Please define “actual O&M costs for QF interconnected interests.”
- c. Please provide a list and a detailed description of the types of O&M costs that Shorock believes a QF should be responsible for paying.

**REQUEST NO. 12:** If Idaho Power offers the option of charging actual O&M costs for interconnections used by QF projects, please explain how QFs would financially cope with catastrophic events that may cause significant damage to interconnection facilities?

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



Edith Pacillo  
Deputy Attorney General

i:umisc:prodreq/ipcc18.7epyy prod req3 Shorock Hydro

## 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 SHOROCK HYDRO, INC.** 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