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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) 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 **FRIDAY, AUGUST 10, 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. 11: In “Idahohydro, 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 J.R. Simplot Company 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 *20th* day of July 2018.



Edith Pacillo
Deputy Attorney General

i:\umisc:prodreq\ipce18.7epyy prod req3 J.R. Simplot

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 20th DAY OF JULY 2018, SERVED THE FOREGOING **THIRD 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

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