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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
IDAHO POWER FOR APPROVAL OR) CASE NO. IPC-E-19-01
REJECTION OF AN ENERGY SALES)
AGREEMENT WITH J.R. SIMPLOT COMPANY) FIRST PRODUCTION
- POCATELLO COGENERATION AND SMALL) REQUEST OF THE
PURCHASED POWER PROJECT) COMMISSION STAFF TO
) IDAHO POWER COMPANY
)
_____)

The Staff of the Idaho Public Utilities Commission, by and through its attorney of record, Edward Jewell, Deputy Attorney General, request that Idaho Power Company (Company) provide the following documents and information as soon as possible, or by **TUESDAY, FEBRUARY 5, 2019.**¹

This Production Request is continuing, and the Company 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, supporting workpapers that provide detail or are the source of information used in calculations. The Company 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

¹ Staff is requesting an expedited response. If responding by this date will be problematic, please call Staff's attorney at (208) 334-0314.

and if different the witness who can sponsor the answer at hearing if need be. Reference 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. 1: Page 3 of the Application states that “Under the terms of this ESA, Simplot elected to contract with Idaho Power for a three-year term using the non-levelized, non-seasonal hydro published avoided cost rates as currently established by the Commission in Order No. 34062 dated May 16, 2018, for replacement contracts and for energy deliveries of less than 10aMW.” Please confirm whether the term “non-seasonal hydro” is correct. Please provide an explanation.

REQUEST NO. 2: Order No. 29632 requires a 48-hour minimum forced outage requirement to discourage unreasonable numbers of forced outage declarations that could result in a burdensome amount of accounting and contract administration activities. Please confirm that parties agree to apply the 48-hour minimum requirement to both forced outage and force majeure events even though the Commission order only requires it to be applied to forced outages.

REQUEST NO. 3: Page 5 of the Application states, “Simplot requested that the notification of Net Energy Amount monthly adjustments described in paragraph 6.2.3 be reduced from one-month advanced notice to five business days’ notice prior to the upcoming month...Idaho Power agrees that these are reasonable modifications that can be accommodated with Idaho Power’s operations.” Please provide justification and evidence to support why Idaho Power believes (1) it is a reasonable modification, and (2) it can be accommodated with Idaho Power’s operations.

REQUEST NO. 4: Please describe and quantify the benefit that the Company will lose by reducing notification of Net Energy Amount monthly adjustments from one-month advanced notice to five-day advanced notice prior to the delivery month for the Simplot project at issue in this case.

REQUEST NO. 5: Does Idaho Power believe it is reasonable and/or appropriate to reduce notification of Net Energy Amount monthly adjustments from one-month advanced notice to five-day advanced notice prior to the delivery month for all existing “other” category of PURPA projects when they renew their contracts? Please explain why or why not.

REQUEST NO. 6: Does Idaho Power believe it is reasonable and/or appropriate to reduce notification of Net Energy Amount monthly adjustments from one-month advanced notice to five-day advanced notice prior to the delivery month for all new “other” category of PURPA projects? Please explain why or why not.

REQUEST NO. 7: Does Idaho Power believe it is appropriate to reduce notification of Net Energy Amount monthly adjustments from one-month advanced notice to five-day advanced notice prior to the delivery month for all new seasonal hydro, non-seasonal hydro, solar, and wind PURPA projects? Please explain why or why not.

REQUEST NO. 8: Does Idaho Power believe it is appropriate to reduce notification of Net Energy Amount monthly adjustments from one-month advanced notice to five-day advanced notice prior to the delivery month for all existing seasonal hydro, non-seasonal hydro, solar, and wind PURPA projects when they renew their contracts? Please explain why or why not.

REQUEST NO. 9: Please describe and quantify the benefits that the Company will lose by reducing notification of Net Energy Amount monthly adjustments from one-month advanced notice to five-day advanced notice prior to the delivery month for both new contracts and existing contracts of all resource types.

REQUEST NO. 10: Does Idaho Power believe it should allow existing PURPA contracts that are not up for renewal to reduce notification of Net Energy Amount monthly adjustments from one-month advanced notice to five-day advanced notice prior to the delivery month, as it did in Case Nos. IPC-E-15-11, IPC-E-15-21, and IPC-E-15-22? Please explain why or why not.

REQUEST NO. 11: In Idaho Power’s view, what effect, if any, do the clauses found in the Applications in Case Nos. IPC-E-17-14, IPC-E-18-04, and IPC-E-18-09 have on the need for a QF to request an amendment to the 90-110 provisions in the QFs’ contracts from Idaho Power? In Idaho Power’s view, would Idaho Power need to file an amendment with the Commission in order to effectuate the five-day notice provision in these contracts?

REQUEST NO. 12: Is Idaho Power aware of any other Applications that contain similar language as referenced in the above Request No. 11?

REQUEST NO. 13: The “Answer to Interrogatory No. 2” of “Idaho Power Company’s Answers and Responses to J.R. Simplot’s First Interrogatories, Requests for Admission, and Requests for Production to Idaho Power Company” in Case No. IPC-E-18-07 describes how estimates of generation on a monthly basis are used in the monthly Operating Plan, which is part of the Company’s risk management process. Please describe how reducing notification of Net Energy Amount monthly adjustments from one-month advanced notice to five-day advanced notice prior to the delivery month would affect the monthly Operating Plan and the risk management process in general.

REQUEST NO. 14: The “Response to Request for Admission No. 1” of “Idaho Power Company’s Answers and Responses to J.R. Simplot’s First Interrogatories, Requests for Admission, and Requests for Production to Idaho Power Company” in Case No. IPC-E-18-07 states that “there is an entire process of estimating generation from the month-ahead through the day-ahead, and into real time required to serve load and balance the system, for which a QF’s monthly estimates are used.” Please describe the impacts of reducing notification of Net Energy Amount monthly adjustments from one-month advanced notice to five-day advanced notice prior to the delivery month on the month-ahead level, the day-ahead level, and the real-time level.

Dated at Boise, Idaho, this 24th day of January 2019.

A handwritten signature in cursive script, appearing to read "Edward Jewell".

Edward Jewell
Deputy Attorney General

i:umisc:prodreq/ipce19.1ejyrf prod req1

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 24TH DAY OF JANUARY 2019, SERVED THE FOREGOING **FIRST PRODUCTION REQUEST OF THE COMMISSION STAFF TO IDAHO POWER COMPANY** IN CASE NO. IPC-E-19-01, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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