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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorneys for the J. R. Simplot Company

BEFORE THE  
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER )  
COMPANY'S 2013 INTEGRATED ) CASE NO. IPC-E-13-15  
RESOURCE PLAN )  
)  
) PETITION TO INTERVENE  
) OF THE J. R. SIMPLOT COMPANY  
)  
)  
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)

COMES NOW, The J. R. Simplot Company, hereinafter referred to as "Intervenor," and pursuant to this Commission's Rule of Procedure, Rule 071, IDAPA 31.10.01074, hereby petitions the Commission for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

The name of this Intervenor is:  
J. R. Simplot Company

This Intervenor will be represented herein by:

Peter J. Richardson, Esq.  
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Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to Peter J. Richardson as noted above and to:

Dr. Don Reading  
6070 Hill Road  
Boise, Idaho 83703  
(208) 342-1700  
[dreading@mindspring.com](mailto:dreading@mindspring.com)

This Intervenor, the J. R. Simplot Company, is a large consumer of electricity in the State of Idaho. The J. R. Simplot Company receives electric utility services from the Applicant under multiple tariff schedules including as an irrigator, at its commercial enterprises, and as large power service customers under Schedule 19. In addition the J. R. Simplot Company is a special contract customer at its Don Plant in Pocatello, Idaho. As such, the J. R. Simplot Company claims a direct and substantial interest in this proceeding.

This Intervenor, in its capacity as a multi-faceted electrical customer, intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on its electric rates. No other party represents this Intervenor's interests herein.

**WHEREFORE**, the J. R. Simplot Company requests that this Commission grant its Petition to Intervene in these proceedings and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, present argument and to otherwise fully participate in these proceedings.

DATED this 29th day of July, 2013.

Richardson Adams, P LLC

By   
Peter J. Richardson  
Attorneys for the J. R. Simplot Company

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 29th day of July, 2013, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE J. R. SIMPLOT COMPANY, Case No. IPC-E-13-15, was served by electronic mail and U.S. Mail, postage prepaid, to:

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Nina Curtis  
Legal Assistant