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IDAHO PUBLIC UTILITIES COMMISSION

JENNIFER M. REINHARDT-TESSMER
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September 12, 2013

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83702

Re: Case No. IPC-E-13-17
J. R. Simplot Company's Petition – Idaho Power Company's Supplement to
Its Motion to Dismiss

Dear Ms. Jewell:

Enclosed for filing in the above matter are an original and seven (7) copies of Idaho Power Company's Supplement to Its Motion to Dismiss.

Sincerely,

Jennifer M. Reinhardt-Tessmer

JRT:csb
Enclosures

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Attorneys for Idaho Power Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)
J.R. SIMPLOT COMPANY FOR A) CASE NO. IPC-E-13-17
DETERMINATION OF PRICE)
REGARDING THE PURCHASE AND) IDAHO POWER COMPANY'S
ACQUISITION OF CERTAIN ASSETS) SUPPLEMENT TO ITS MOTION TO
OWNED BY IDAHO POWER COMPANY.) DISMISS
_____)

Idaho Power Company's ("Idaho Power" or "Company") Motion to Dismiss filed on August 28, 2013, was crafted specifically to respond to the J. R. Simplot Company's ("Simplot") Application and Request to Determine Price ("Application")¹ filed pursuant to I.C. § 61-328 for "approval of its purchase and acquisition of certain assets owned by the Idaho Power Company . . . and to set a price for said purchase." Application, p. 1. In light of the confusion expressed in Simplot's Answer to Idaho Power's Motion to Dismiss for Lack of Subject Matter Jurisdiction ("Answer"), the Company respectfully

¹ The Commission processed Simplot's Application as a Petition under its Rules of Procedure in Order No. 32870.