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J.R. SIMPLOT COMPANY ONE CAPITAL CENTER 999 MAIN STREET SUITE 1300
PO. BOX 27 BOISE, IDAHO 83707 (208) 336-2110 TELEX 368432

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CORPORATE HEADQUARTERS

90 JUN 20 AM 8 54

IDAHO PUBLIC
UTILITIES COMMISSION

M. Saeius

June 18, 1990

Ms. Myrna Walters, Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702

RE: Case No. IPC-E-90-8

Dear Myrna:

Enclosed for filing is the original and seven (7) copies of the Petition of J. R. Simplot Company for Leave to Intervene in the above-referenced case.

Sincerely,

Vicki Lower

VICKI A. LOWER
Legal Secretary

3877v

Enclosures

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

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CASE NO. IPC-E-90-8
IDAHO PUBLIC UTILITIES COMMISSION

R. Walters

IN THE MATTER OF THE APPLICATION)
OF IDAHO POWER COMPANY FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE)
AND NECESSITY FOR THE RATE BASING)
OF THE MILNER HYDROELECTRIC)
PROJECT OR, IN THE ALTERNATIVE, A)
DETERMINATION OF EXEMPT STATUS FOR)
THE MILNER HYDROELECTRIC PROJECT.)
_____)

PETITION OF J. R. SIMPLOT COMPANY FOR LEAVE TO INTERVENE

The J. R. Simplot Company ("Simplot") respectfully petitions the Idaho Public Utilities Commission for leave to intervene in the above-captioned matter upon the following grounds:

1. The J. R. Simplot Company is a Nevada corporation authorized to do business in the State of Idaho, with its principal office and business address therein being P.O. Box 27, Boise, Idaho 83707.

2. Simplot operates several facilities within the service area of Idaho Power Company ("Applicant"). Simplot receives electric utility services under a special contract with Applicant at the Simplot fertilizer facility at Pocatello, Idaho, and is supplied energy by Applicant at several potato processing facilities under Tariff Schedule 19.

3. Simplot has a direct and substantial interest in this proceeding and intends that it would participate in all respects herein as a party as may be required to represent its interests.

4. Simplot requests that it be allowed the opportunity to cross-examine witnesses, conduct discovery, and present evidence and testimony in the proceedings.

5. Without the opportunity to intervene herein, Simplot would be without any manner or means of participating in the lawful determination of issues raised by the Commission in its Notice of Application, and Simplot would be unable to participate in proceedings wherein the amounts which it pays for electric service are properly determined.

6. It is respectfully requested that all testimony, pleadings, exhibits, orders of the Idaho Public Utilities Commission, and any other documents relating to Case No. IPC-E-90-8 be served upon:

R. Scott Pasley
Assistant General Counsel
J. R. Simplot Company
P.O. Box 27
Boise, ID 83707

David H. Hawk
Director, Energy Natural Resources
J. R. Simplot Company
P.O. Box 27
Boise, ID 83707

WHEREFORE, Simplot requests that this Commission confirm its right to intervene in these proceedings, and to appear and participate in all matters as may be necessary and appropriate, including the presentation of evidence and participation in any discussion or argument and otherwise to fully participate in the proceedings.

DATED at Boise, Idaho, this 18th day of June, 1990.

J. R. SIMPLOT COMPANY

By R. Scott Pasley
R. SCOTT PASLEY
Assistant General Counsel
P.O. Box 27
Boise, ID 83707

VERIFICATION

STATE OF IDAHO)
) ss.
County of Ada)

I, R. Scott Pasley, being first duly sworn upon oath, depose and say that I am the attorney for the petitioner herein, that I have read the foregoing petition, and it is true and I verily believe.

R. Scott Pasley
R. SCOTT PASLEY

SUBSCRIBED AND SWORN to before me this 18th day of June, 1990.

Vicki A. Lowe
NOTARY PUBLIC FOR IDAHO
Residing at Meridian, Idaho
My Commission Expires: 11-06-91

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on the 18th day of June, 1990, I caused the original and seven copies of the foregoing Petition of J. R. Simplot Company for Leave to Intervene to be deposited in the United States mail, first-class postage prepaid, in an envelope addressed to:

Ms. Myrna Walters, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID 83702

and a true and correct copy to be deposited in the United States mail, first-class postage prepaid, in envelopes addressed to each of the following persons:

PARTIES OF RECORD

Larry D. Ripley, Esq.
Legal Department
Idaho Power Company
P.O. Box 70
Boise, ID 83707

Steven L. Herndon, Esq.
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Grant E. Tanner
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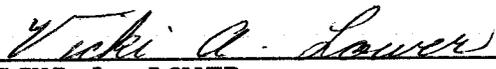
Peter J. Richardson
Lindsay, Hart, Neil & Weigler
350 N. 9th, Suite 400
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Harold C. Miles
Idaho Consumer Affairs, Inc.
316 15th Avenue South
Nampa, ID 83651

INTERESTED PARTIES

Ron Williams
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P.O. Box 739
Boise, ID 83701

Michael Wheat
26 Elm Lane
Bay City, TX 77414



VICKI A. LOWER

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