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IDAHO PUBLIC  
UTILITIES COMMISSION

Attorney for J. R. Simplot Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF )	<b>CASE NO. PAC-E-05-1</b>
PACIFICORP DBA UTAH POWER & LIGHT )	
COMPANY FOR AUTHORITY TO INCREASE )	<b>PETITION OF</b>
ITS RATES FOR ELECTRIC SERVICE TO )	<b>J. R. SIMPLOT COMPANY</b>
ELECTRIC CUSTOMERS IN THE STATE OF )	<b>FOR LEAVE TO</b>
IDAHO. )	<b>INTERVENE</b>
_____ )	

COMES NOW, the J. R. Simplot Company, a corporation duly authorized to conduct business in the state of Idaho, hereinafter referred to as "Intervenor", and pursuant to the "Notice of Application" issued in the above captioned case by the Secretary of the Idaho Public Utilities Commission (Commission), and pursuant to this Commission's Rules of Procedure, Rule 071, IDAPA 31.01.01071, petitions the Commission for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states as follows:

1. The name and address of Intervenor is:

J. R. Simplot Company  
Attn: David Hawk  
Director, Energy Natural Resources  
999 Main Street  
P. O. Box 27  
Boise, Idaho 83702  
(208) 389-7306  
(208) 389-7333 telefax  
E-Mail: [dhawk@simplot.com](mailto:dhawk@simplot.com)

Intervenor will be represented herein by:

R. Scott Pasley  
Assistant General Counsel  
J. R. Simplot Company  
999 Main Street  
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(208) 389-7321  
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E-Mail: [spasley@simplot.com](mailto:spasley@simplot.com)

Copies of all pleadings, production requests, production responses, Commission orders and other documents should be provided to David Hawk and R. Scott Pasley as noted above.

2. This Intervenor, the J. R. Simplot Company, is a Nevada Corporation duly authorized to conduct business in the state of Idaho.

3. This Intervenor is directly and substantially interested in the above-captioned proceeding in that it is both an industrial and irrigation customer of Pacificorp in Idaho and as a rate payer has an interest in these proceedings

4. This Intervenor intends to participate herein as a party, and if necessary to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in

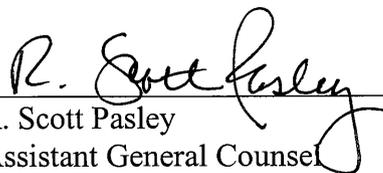
argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

5. Without the opportunity to intervene herein, this Intervenor would be without any manner or means of participating in the lawful determination of issues raised by the Commission in its Notice of Application.

WHEREFORE, the J. R. Simplot Company requests that this Commission grant this 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 at Boise, Idaho this 15th day of February, 2005.

Respectfully submitted,

By:   
R. Scott Pasley  
Assistant General Counsel  
J. R. Simplot Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 15th day of February, 2005, served the foregoing Petition to Intervene by the J. R. Simplot Company upon all parties of record in this proceedings, by mailing a copy thereof, properly addressed with postage prepaid, to:

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