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December 23, 2011

IDAHO PUBLIC
UTILITIES COMMISSION

**VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY**

Jean D. Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

Re: Case No. PAC-E-11-12
In the Matter of the Application of Rocky Mountain Power for Approval of Changes to its Electric Service Schedules and a Price Increase of \$32.7 Million, or Approximately 15.0 Percent

Dear Ms. Jewell:

Please find enclosed an original and seven copies of Rocky Mountain Power's Response to Monsanto's Comments.

If you have any questions regarding this filing, please contact Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Very truly yours,

Jeffrey K. Larsen
Vice President, Regulation

cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd of December, 2011, I caused to be served, via e-mail and/or US mail, a true and correct copy of the foregoing document in PAC-E-11-12 to the following:

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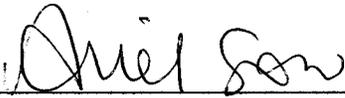
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Attorneys for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE)
APPLICATION OF ROCKY) CASE NO. PAC-E-11-12
MOUNTAIN POWER FOR)
APPROVAL OF CHANGES TO ITS)
ELECTRIC SERVICE SCHEDULES)
AND A PRICE INCREASE OF \$32.7)
MILLION, OR APPROXIMATELY)
15.0 PERCENT)
)**

**ROCKY MOUNTAIN POWER'S RESPONSE TO
MONSANTO'S COMMENTS**

COMES NOW Rocky Mountain Power ("RMP" or "Company") by and through its attorneys and files its response to "Monsanto Comments" which were filed and served at the conclusion of the December 19, 2011 hearing. Monsanto had an opportunity to file comments in support of the Stipulation and make any other comment that they deemed necessary on

November 2, 2011, as both the Idaho Public Utilities Commission Staff and the Company chose to do, but Monsanto failed to take advantage of.

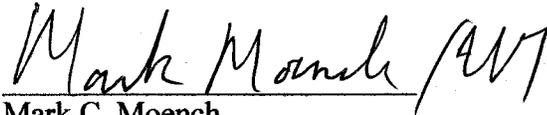
The Chairman correctly acknowledged that the purpose of the December 19 hearing was to consider the Stipulation dated October 17, 2011. Objection to oral commentary by Monsanto's counsel on issues well beyond those addressed in the hearing on the Stipulation, was properly sustained. Similarly, Monsanto's written comments should be disregarded. Furthermore, the offered comments are not accurate in many respects and appear to be an attempt to bias the Commission on matters yet to be presented to the Commission for consideration. The information that Monsanto has offered is speculative, misleading, or unchallenged by other parties, including their claims on price comparisons, percentage increases of prices, and future capital investment need and justification. They have also misrepresented comparisons between transmission investment merger commitments and actual transmission projects. The Company respectfully requests that the Commission give no weight to the matters addressed by Monsanto not directly relevant to Monsanto's support of the Stipulation pending in this Docket and reserve judgment on any future matters until the proper facts are presented to the Commission for consideration.

CONCLUSION

RMP respectfully requests that the Commission approve the October 17, 2011, Stipulation supported by Rocky Mountain Power, Monsanto, Commission Staff, Idaho Irrigation Pumpers Association, and PacifiCorp Idaho Industrial Customers.

DATED this 23rd day of December 2011.

Respectfully submitted,
ROCKY MOUNTAIN POWER



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