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WILLIAM D. OLSON, OF COUNSEL

June 2, 2011

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

Re: Case No. PAC-E-11-12

Dear Mrs. Jewell

Please find enclosed for filing the original and seven copies of Monsanto Company's *Petition to Intervene*.

Thank you for your assistance.

Sincerely,


RANDALL C. BUDGE

RCB:rr

Enclosures

cc: Service List (w/encls.)

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UTILITIES COMMISSION

Randall C. Budge, ISB No. 1949
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Attorneys for Intervenor Monsanto Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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

PETITION OF MONSANTO COMPANY
FOR LEAVE TO INTERVENE

COMES NOW Monsanto Company, herein called "this Intervenor" and pursuant to Rule 72 of the rules of Procedure of the Idaho Public Utility Commission, and by this Petition asks leave to intervene herein and to appear and participate as a party herein, and as basis therefor states as follows:

(1) The name and address of this Intervenor is:

Monsanto Company
c/o Gary Kajander, Manager, Energy Procurement
800 N. Lindburg Blvd., Mailzone C2NF
St. Louis, Missouri 63167

This Intervenor will be represented by:

Randall C. Budge
Racine, Olson, Nye, Budge & Bailey, Chartered
P.O. Box 1391; 201 E. Center
Pocatello, Idaho 83204-1391

and requests that copies of all pleadings and production requests and responses should be provided to the following:

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Brubaker & Associates
16690 Swingley Ridge Rd., #140
Chesterfield, MO 63017
E-Mail: bcollins@consultbai.com

James R. Smith
Monsanto Company
P.O. Box 816
Soda Springs, Idaho 83276
Fax: 208-547-3312
E-Mail: jim.r.smith@monsanto.com

(2) This Intervenor has a direct and substantial interest in this proceeding as a special contract customer of Applicant Rocky Mountain Power and intends to participate in all respects herein as a party as may be required to represent its interests.

(3) Without the opportunity to intervene herein, this Intervenor would be without a manner or means of participating in the lawful determination of issues which will result in affecting its rates for electric service.

WHEREFORE, this Intervenor requests that this Commission confirm this Intervenor's leave 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, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

DATED this 2nd day of June, 2011.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By Randall C. Budge
RANDALL C. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 2nd day of June, 2011, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Jean D. Jewell, Secretary (original and 7)
Idaho Public Utilities Commission
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