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March 9, 2012

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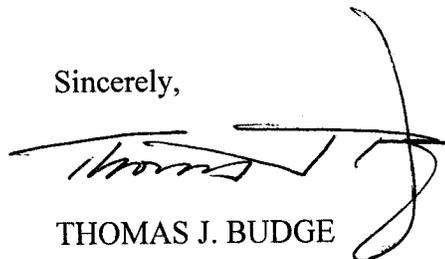
Jean D. Jewell, Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

Re: *Case No. PAC-E-12-03*

Dear Mrs. Jewell:

Yesterday Randy Budge mailed you an original and seven copies of *Monsanto Company's Motion to Extend Comment Deadline* in the above-referenced matter. After mailing those documents, we discovered that certain dates therein were cited incorrectly. We kindly ask that you destroy the documents mailed yesterday and instead file with the Commission the enclosed original and seven copies of the corrected *Monsanto Company's Motion to Extend Comment Deadline*. Thank you for your assistance.

Sincerely,



THOMAS J. BUDGE

RCB:rr

Enclosures

cc: Service List (w/encls.)

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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) **Case No. PAC-E-12-03**
AUTHORITY TO INCREASE RATES BY)
\$2.6 MILLION TO RECOVER DEFERRED)
NET POWER COSTS THROUGH THE ENERGY)
COST ADJUSTMENT MECHANISM)
_____)

MOTION TO EXTEND COMMENT DEADLINE

Intervenor Monsanto Company (“Monsanto”), acting by and through counsel, hereby moves the Idaho Public Utilities Commission (“Commission”) for the entry of an Order extending the deadline for filing written comments on PacifiCorp d/b/a Rocky Mountain Power’s (the “Company”) annual Energy Cost Adjustment Mechanism (“ECAM”) filing. This is the first time that Monsanto has been subject to the Company’s ECAM filing, and additional time is needed to review and evaluate the ECAM filing and submit meaningful comments. Monsanto respectfully requests that the deadline be extended by one week—from March 13, 2012, to March 20, 2012.

BACKGROUND

On February 1, 2012, the Company submitted its Application to the Commission seeking approval of the Company’s annual ECAM rate for all customer classes, including for the first time Monsanto and Agrium, based on the deferral period beginning December 1, 2010, through November 30, 2011 (“Deferral Period”). The Application is supported by the testimony and exhibits of Company witnesses Gregory N. Duvall (redacted) and William R. Griffith.

Effective January 1, 2011, Monsanto's and Agrium's loads are included in the calculation of the ECAM balance for the first time, pursuant to a Stipulation entered into and approved in Order No. 30904, Case No. PAC-E-08-08. In addition, as indicated in the Stipulation approved by the Commission in Order No. 32432, Case No. PAC-E-11-12, the Company will amortize and collect over three years Monsanto's and Agrium's share of the Commission-approved 2011 ECAM balances.

On February 13, 2012, Monsanto's Petition to Intervene was filed with the Commission. On February 15, 2012, the Commission issued its Notice of Application, Notice of Modified Procedure, Notice of Intervention Deadline and Order No. 32460 establishing a deadline of February 28, 2012 to file petitions to intervene and a deadline of March 13, 2012, to file written Comments and any requests for a hearing concerning the Company's ECAM Application.

REVIEW OF APPLICATION

Monsanto desires to carefully review the Company's filing because it has not previously been subject to the ECAM in Idaho. Although Monsanto's consultants sought to review the filing expeditiously, this was delayed in part because certain information designated confidential by the Company was redacted from the filing and supporting workpapers and some delay was experienced in getting a Protective Agreement signed and in place so the complete filing was available for review.

Upon review of the filing certain questions arose requiring discovery. Accordingly, on March 1, 2012, Monsanto submitted its First Set of Data Requests to the Company consisting of 30. The Company has not yet submitted its responses to Monsanto's data requests, but has agreed to expedite its responses which are not yet due under the Commission's Rules. Assuming the Company's responses will be submitted forthwith, at this late date Monsanto will not have a reasonable opportunity to review the same and submit meaningful comments by the March 13, 2012 deadline.

MOTION FOR EXTENSION

By this Motion Monsanto requests the Commission enter an Order extending the comment deadline from March 13 to March 20, 2012. Provided the Company's responses to Monsanto's data requests are received in the next few days, Monsanto believes that this extension will provide it with a reasonable and necessary opportunity to evaluate the ECAM

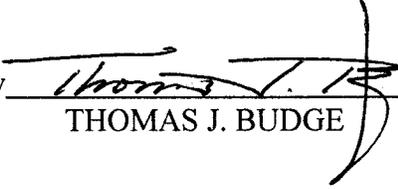
filing and submit meaningful comments. Monsanto does not request any delay in the requested April 1, 2012 date to implement the ECAM adjustments. Prior to the filing of this Motion Monsanto's counsel consulted with counsel for the Company and Staff and received authorization to represent that neither opposed this Motion.

Based on the foregoing, Monsanto respectfully requests that the Commission enter an Order extending the ECAM comment deadline by one week from March 13, 2012 to March 20, 2012.

DATED this 9th day of March, 2012.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By


THOMAS J. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 9th day of March, 2012, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

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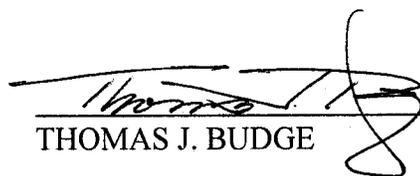
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