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April 19, 2012

OVERNIGHT MAIL:

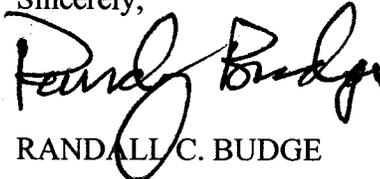
Jean D. Jewell, Secretary
Idaho Public Utilities Commission
P.O. Box 83720
Boise, Idaho 83720-0074

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

Dear Mrs. Jewell:

Enclosed for filing please find the original and nine copies of *Monsanto Company's Petition for Reconsideration, Brief in Support of Motion for Reconsideration, Direct Testimony and Exhibits of Kathryn E. Iverson and Direct Testimony and Exhibits of Mark T. Widmer* in Case No. PAC-E-12-03, together with a CD containing the Direct Testimonies and Exhibits. Thank you for your assistance.

Sincerely,


RANDALL C. BUDGE

RCB:rr

Enclosures

cc: Service List (w/encls.)

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IDAHO PUBLIC
UTILITIES COMMISSION

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) | PETITION FOR |
| NET POWER COSTS THROUGH THE ENERGY) | RECONSIDERATION |
| COST ADJUSTMENT MECHANISM) | |
| _____) | |

COMES NOW Monsanto Company, through counsel, and hereby petitions the Commission pursuant to Rule 331 of the IPUC Rules of Procedure of IPUC for reconsideration Order No. 32507 issued on April 3, 2012, on the grounds that the Order is unreasonable, unlawful, erroneous or not in conformity with the law or evidence presented with respect to the transmission line loss and excess outage adjustments which were not accurately or correctly established and applied resulting in a Schedule 94 Transmission Loss Differentiated Energy Rate that is incorrect and not fair, just or reasonable for Monsanto. This Petition is based on the record and further supported by the direct testimony and exhibits of Monsanto witnesses, Kathryn E. Iverson and Mark Widmer, together with Monsanto's Supporting Brief filed herewith which further detail the nature and quantity of evidence and argument Monsanto offers if reconsideration is granted. Monsanto does not request a hearing, instead that the issues raised in this Petition be decided based upon the record.

DATED this 19th day of April, 2012.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By Randall C. Budge
RANDALL C. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 19th day of April, 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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