

# Williams · Bradbury

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IDAHO PUBLIC  
UTILITIES COMMISSION

March 22, 2013

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

Re: PAC-E-13-04

Dear Ms. Jewell:

Please find enclosed an original and seven copies of Petition of PacifiCorp Idaho Industrial Customers for Leave to Intervene for filing in the above referenced case.

Thank you for your assistance in this matter. Please feel free to give me a call should you have any questions.

Sincerely,



Ronald L. Williams

RLW/jr  
Enclosures

Ronald L. Williams, ISB No. 3034  
Williams Bradbury, P.C.  
1015 W. Hays St.  
Boise ID, 83702  
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ron@williamsbradbury.com

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Attorneys for PIIC

**BEFORE THE IDAHO PUBLIC UTILITES COMMISSION**

IN THE MATTER OF THE APPLICATION )	Case No. PAC-E-13-04
OF ROCKY MOUNTAIN TO INITIATE )	
DISCUSSIONS WITH INTERESTED )	PETITION OF PACIFICORP IDAHO
PARTIES ON ALTERNATIVE RATE )	INDUSTRIAL CUSTOMERS
PLAN PROPOSALS )	FOR LEAVE TO INTERVENE
)	
)	

Pursuant to Rules 71 and 73 of the Idaho Public Utilities Commission's Rules of Practice and Procedure, PacifiCorp Idaho Industrial Customers ("PIIC") petitions the Idaho Public Utilities Commission (the "Commission") for leave to intervene. In support of this Petition, PIIC states as follows:

1. The name and address of PIIC is:  
  
PacifiCorp Idaho Industrial Customers  
c/o Williams Bradbury, P.C.  
1015 W. Hays St,  
Boise, ID 83702
2. PIIC will be represented in this proceeding by Williams Bradbury, P.C.

All documents relating to these proceedings should be served on the following persons at the addresses listed:

Ronald L. Williams  
Williams Bradbury, P.C.  
1015 W. Hays St.  
Boise ID, 83702  
Telephone: 208-344-6633  
Facsimile: 208-344-0077  
E-mail: ron@williamsbradbury.com

Tim Buller  
PacifiCorp Idaho Industrial Customers  
Agrium Us Inc./Nu-West Industries  
3010 Conda Rd  
Soda Springs, ID, 83276-5301  
E-mail: TBuller@agrium.com

Don Schoenbeck  
RCS, Inc.  
900 Washington St, Suite 780  
Vancouver WA, 98660  
E-Mail: dws@r-c-s-inc.com

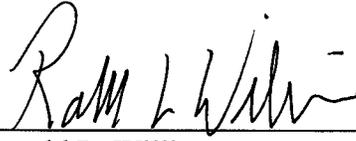
3. PIIC is a coalition of Idaho companies that are industrial customers of Rocky Mountain Power ("RMP"). RMP's application to engage in settlement discussions with its customers in Idaho with a desire to reach agreement on terms that would allow RMP to avoid having to file a 2013 general rate case greatly impacts PIIC members. PIIC has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with these proceedings. PIIC intends to participate in all respects of this proceeding and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

4 Without the opportunity to intervene herein, PIIC would be without a manner or means of participating in the lawful determination of issues which will result in affecting the rates for electric service to the PIIC members.

WHEREFORE, PIIC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding 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 22 day of March, 2013.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald L. Williams", written over a horizontal line.

Ronald L. Williams  
Williams Bradbury, P.C.  
Attorneys for PIIC

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on this 22 day of March, 2013, I caused to be served a true and correct copy of the foregoing document upon the following individuals in the manner indicated below:

Ted Weston  
**Rocky Mountain Power**  
201 South Main, Suite 2300  
Salt Lake City, UT 84111  
E-Mail: ted.weston@pacificorp.com

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- US Mail (postage prepaid)
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- Federal Express
- Electronic Transmission

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Randall C. Budge  
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Attorney for **Monsanto Company**

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Surprise, AZ 85387  
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**Monsanto Company**

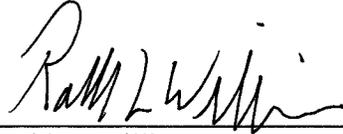
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- Electronic Transmission



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Ronald L. Williams