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P.O. Box 1391
Pocatello, ID 83204
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IDAHO PUBLIC
UTILITIES COMMISSION

RANDALL C. BUDGE
rcb@racinelaw.net

March 3, 2015

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

Sent Via Email & U.S. Mail

Re: IPUC Case No. PAC-E-14-10

Dear Ms. Jewell:

Enclosed you will find the original and seven (7) copies of *Petition of Monsanto Company for Leave to Intervene*. Please file the same with the commission's records and return a file-stamped PDF copy to me. If you have any questions, please don't hesitate to call.

Thank you.

Sincerely,

RANDALL C. BUDGE

RCB:ts
cc: Service List

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Randall C. Budge, ISB No. 1949
Thomas J. Budge, ISB No. 7465
RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED
P.O. Box 1391; 201 E. Center
Pocatello, Idaho 83204-1391
Telephone: (208) 232-6101
Fax: (208) 232-6109
rcb@racinelaw.net

Attorneys for Intervenor Monsanto Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR APPROVAL OF A TRANSACTION TO CLOSE DEER CREEK MINE AND FOR A DEFERRED ACCOUNTING ORDER	)	**Case No. PAC-E-14-10**

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 Steven D. Spinner, Manager, Energy Procurement
800 N. Lindburg Blvd., Mailzone C2NF
St. Louis, Missouri 63167

This Intervenor will be represented by:

Randall C. Budge
Thomas J. 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:

Randall C. Budge
Racine, Olson, Nye, Budge & Bailey, Chartered
P.O. Box 1391; 201 E. Center
Pocatello, Idaho 83204-1391
Telephone: (208) 232-6101
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E-mail: rcb@racinelaw.net

Brad Mullins
333 SW Taylor Street, Suite 400
Portland, OR 97204
E-mail: brmullins@mwanalytics.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 3rd day of March, 2015.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By: _____
RANDALL C. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 3rd day of March, 2015, 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
P.O. Box 83720
Boise, ID 83720-0074
E-mail: jean.jewell@puc.idaho.gov — U.S. Mail + Email

Ted Weston
Rocky Mountain Power
201 South Main, Suite 2300
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for Lisa Spanos

RANDALL C. BUDGE