



RANDALL C. BUDGE  
rcb@racinelaw.net

September 6, 2016

Jean D. Jewell, Secretary  
Idaho Public Utilities Commission  
PO Box 83720  
Boise, Idaho 83720-0074  
[jean.jewell@puc.idaho.gov](mailto:jean.jewell@puc.idaho.gov)

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2016 SEP -8 AM 8:51  
IDAHO PUBLIC  
UTILITIES COMMISSION

**Re: IPUC Case No. PAC-E-16-12**

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. If you have any questions, please don't hesitate to call.

Thank you.

Sincerely,

RANDALL C. BUDGE

RCB:ts  
cc: Service List

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](mailto:rcb@racinelaw.net)

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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 TO  
UPDATE BASE NET POWER COSTS AND  
IMPLEMENT A RATE STABILITY PLAN**

**CASE NO. PAC-E-16-12**

**PETITION FOR 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  
Fax: (208) 232-6109  
E-mail: [rcb@racinelaw.net](mailto:rcb@racinelaw.net)

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

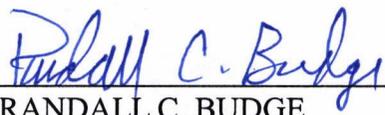
James R. Smith  
Monsanto Company  
P.O. Box 816  
Soda Springs, Idaho 83276  
Fax: 208-547-3312  
E-Mail: [jim.r.smith@monsanto.com](mailto:jim.r.smith@monsanto.com)

- (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 6<sup>th</sup> day of September, 2016.

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

By:   
RANDALL C. BUDGE

**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on this 6<sup>th</sup> day of September, 2016, 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](mailto:jean.jewell@puc.idaho.gov)

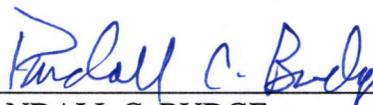
U.S. Mail + Email

Daniel E. Solander  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Facsimile No. (801) 220-4615  
E-mail: [daniel.solander@pacificorp.com](mailto:daniel.solander@pacificorp.com)

E-Mail

Ted Weston  
Idaho Regulatory Affairs Manager  
Rocky Mountain Power  
1407 West North Temple, Suite 330  
Salt Lake City, Utah 84116  
E-mail: [ted.weston@pacificorp.com](mailto:ted.weston@pacificorp.com)

E-Mail

  
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RANDALL C. BUDGE