

JUN 21 2011

Boise, Idaho

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Sup-E-11-01

Attorneys for Intervenor Monsanto Company

**IN THE SUPREME COURT FOR THE STATE OF IDAHO**

IN THE MATTER OF THE APPLICATION OF )  
ROCKY MOUNTAIN POWER FOR APPROVAL )  
OF CHANGES TO ITS ELECTRIC SERVICE )  
SCHEDULES AND A PRICE INCREASE OF )  
\$27.7 MILLION, OR APPROXIMATELY )  
13.7 PERCENT )  
)  
ROCKY MOUNTAIN POWER )  
*APPELLANT* )  
)  
V. )  
)  
IDAHO PUBLIC UTILITIES COMMISSION )  
*RESPONDENT* )  
\_\_\_\_\_ )

Supreme Court Docket No.  
38930 -2011  
Idaho Public Utilities Commission  
PAC-E-10-07

**PETITION FOR  
INTERVENTION**

COMES NOW Monsanto Company ("Monsanto") through counsel and pursuant to Rule 7.1 of the Idaho Appellate Rules and hereby petitions the Supreme Court for Leave to Intervene as a party to this appeal. In support of this Petition Monsanto hereby states and represents as follows:

- (1) Monsanto has a direct and substantial interest in this proceeding as a special contract customer of Appellant Rocky Mountain Power. Monsanto is the largest customer of Appellant in Idaho and the largest single point customer in Appellants six state service territory.

Monsanto takes electric service from Appellant at its Soda Springs plant to produce elemental phosphorous.

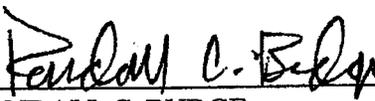
(2) Monsanto was granted intervention by the Idaho Public Utilities Commission in Appellant's general rate Case No. PAC-E-10-07 and fully participated in all proceedings presenting testimony, evidence and cross-examining witnesses.

(3) Monsanto has a direct and substantial interest and will be affected by the outcome of this appeal. Without the opportunity to intervene Monsanto would be without a manner or means of participating in the lawful determination of issues determined by the Idaho Public utilities Commission which result will affect the rates Monsanto pays Appellant for electric services.

Wherefore, Monsanto respectfully requests that the Court exercise its discretion and grant Monsanto Leave to Intervene as a party Respondent and thereafter be a party to the appeal for all purposes.

DATED this 21st day of June, 2011.

RACINE, OLSON, NYE, BUDGE &  
BAILEY, CHARTERED

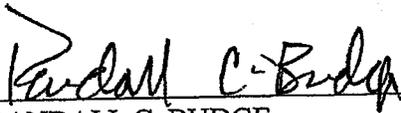
  
\_\_\_\_\_  
RANDALL C. BUDGE

VERIFICATION

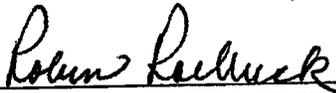
STATE OF IDAHO            )  
                                  : ss.  
COUNTY OF BANNOCK    )

I, RANDALL C. BUDGE, being first duly sworn, upon my oath state that I am authorized to verify this Petition for Intervention on party Respondent's behalf, that I have read the foregoing Petition, that I know the contents thereof, and that the facts stated therein are true and correct to the best of my knowledge and belief.

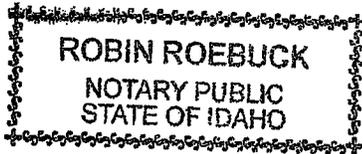
DATED this 21<sup>st</sup> day of June, 2011.

  
\_\_\_\_\_  
RANDALL C. BUDGE

SUBSCRIBED AND SWORN TO before me this 21<sup>st</sup> day of June, 2011.

  
\_\_\_\_\_  
NOTARY PUBLIC FOR IDAHO  
Residing at Pocatello  
My Commission Expires 8/18/2012

(SEAL)



**CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on this 21<sup>st</sup> day of June, 2011, 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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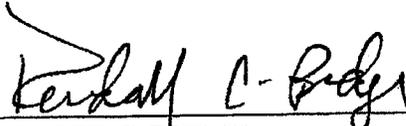
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