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IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF INTERMOUNTAIN)
GAS COMPANY'S APPLICATION TO) CASE NO. INT-G-16-02
CHANGE ITS RATES AND CHARGES FOR)
NATURAL GAS SERVICE IN THE STATE OF) PETITION TO INTERVENE
IDAHO) OF THE AMALGAMATED SUGAR
) COMPANY LLC
)
)
)
)
_____)

COMES NOW, The Amalgamated Sugar Company, LLC, hereinafter referred to as
"Intervenor," and pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA
31.01.01.71 and pursuant to that Notice of Application and Notice of Intervention Deadline
issued by the Commission on September 9, 2016, and hereby petitions the Commission for leave
to intervene herein and to appear and participate herein as a party, and as grounds therefore states
as follows:

1. The name and address of this Intervenor is:

The Amalgamated Sugar Company LLC
Scott Dale Blickenstaff
1951 S. Saturn Way, Ste. 100
Boise, Idaho 83702
Telephone: (208) 383-6584
sblickenstaff@amalsugar.com

Copies of all pleadings, discovery and other documents should be served on Mr.

Blickenstaff and Richardson Adams, PLLC at the addresses noted above.

2. This Intervenor, The Amalgamated Sugar Company LLC is a Delaware Corporation duly qualified to do business in the State of Idaho. Amalgamated Sugar Company receives natural gas utility services from Intermountain Gas Company at all three of its Idaho sugar refinery operations located in Nampa, Twin Falls and Mini Cassia. Amalgamated Sugar claims a direct and substantial interest in this proceeding in that its costs for said natural gas utility services will be affected by the outcome of this proceeding.


3. This Intervenor, intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

4. Without the opportunity to intervene herein, this Intervenor would be without any means of participation in this proceeding which may have a material impact on its cost for natural gas services.

5. Granting this Intervenor's petition to intervene will not unduly broaden the issues nor will it prejudice any party to this case.

WHEREFORE, The Amalgamated Sugar Company LLC respectfully requests that this Commission grant its Petition 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, present argument and to otherwise fully participate in these proceedings.

DATED this 22nd day of September, 2016.


Peter J. Richardson
RICHARDSON ADAMS, PLLC
Attorneys for the Amalgamated Sugar
Company LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd day of September, 2016, a true and correct copy of the within and foregoing PETITION TO INTERVENE BY THE AMALGAMATED SUGAR COMPANY LLC was served by Electronic and U.S. Mail:

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By: 

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