LAW OFFICES OF

## RACINE OLSON NYE BUDGE & BAILEY CHARTERED

JOHN A. BAILEY, JR.

JOHN R. GOODELL

JOHN B. INGELSTROM

DANIEL C. GREEN

BRENT O. ROCHE

KIRK B. HADLEY

201 EAST CENTER STREET

POST OFFICE BOX 1391

POCATELLO, IDAHO 83204-1391

TELEPHONE (208) 232-6101 FACSIMILE (208) 232-6109

www.racinelaw.net

BOISE OFFICE 101 SOUTH CAPITOL BOULEVARD, SUITE 300 BOISE, IDAHO 83702 TELEPHONE: (208) 395-0011 FACSIMILE: (208) 433-0167

IDAHO FALLS OFFICE
477 SHOUP AVENUE
SUITE 107
POST OFFICE BOX 50698
IDAHO FALLS, ID 83405
TELEPHONE: (208) 528-6101
FACSIMILE: (208) 528-6109

ALL OFFICES TOLL FREE (877) 232-6101

LOUIS F. RACINE (1917-2005) WILLIAM D. OLSON, OF COUNSEL JONATHON S. BYINGTON, OF COUNSEL

2013 FEB 13 AM 8: 2

SENDER'S E-MAIL ADDRESS: rcb@racinelaw.net

February 11, 2013

Mrs. Jean Jewell, Secretary Idaho Public Utilities Commission P.O. Box 83720 Boise, Idaho 83720-0074

Re: Case No. PAC-E-13-02

Dear Jean:

W. MARCUS W. NYE

RANDALL C. BUDGE

FRED J. LEWIS ERIC L. OLSEN

CONRAD J. AIKEN

RICHARD A. HEARN, M.D. LANE V. ERICKSON

FREDERICK J. HAHN, III

PATRICK N. GEORGE

DAVID E. ALEXANDER

CANDICE M. MCHUGH

CAROL TIPPI VOLYN JONATHAN M. VOLYN THOMAS J. BUDGE

BRENT L. WHITING DAVE BAGLEY JASON E. FLAIG FERRELL S. RYAN, III

AARON A. CRARY JOHN J. BULGER BRETT R. CAHOON NOLAN E. WITTROCK

SCOTT J. SMITH JOSHUA D. JOHNSON STEPHEN J. MUHONEN

Enclosed for filing please find the original and seven copies of *Petition of Monsanto Company for Leave to Intervene.* Thank you for your assistance.

Sincerely,

RANDALL C. BUDGI

RCB:rr Enclosures

cc: Service List

RECEIVED

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

### 2013 FEB 13 AM 8: 26

IDAMO PUBLIC UTILITIES COMMISSION

### BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

POWER'S APPLICATION FOR AN ORDER	)	Case No. PAC-E-13-02
AUTHORIZING CHANGES IN	)	
DEPRECIATION RATES APPLICABLE TO	)	
ELECTRIC PROPERTY	)	
	)	
	)	
	)	

# 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. Lindbergh Blvd., Mailzone C2NF St. Louis, Missouri 63167

This Intervenor will be represented by:

Randall C. 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

Brubaker & Associates 16690 Swingley Ridge Rd., #140 Chesterfield, MO 63017 E-Mail: 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

- (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 11th day of February, 2013.

RACINE, OLSON, NYE, BUDGE & BAILEY, CHARTERED

By Eucle C. Budge
RANDALL C. BUDGE

#### **CERTIFICATE OF MAILING**

I HEREBY CERTIFY that on this 11<sup>th</sup> day of February, 2013, 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: jjewell@puc.state.id.us

U.S. Mail

Ted Weston Rocky Mountain Power 201 South Main, Suite 2300 Salt Lake City, Utah 84111

E-mail: ted.weston@pacificorp.com

E-Mail

Daniel E. Solander Mark C. Moench Rocky Mountain Power 201 South Main, Suite 2300 Salt Lake city, Utah 84111

E-Mail

E-mail: <u>Daniel.solander@pacificorp.com</u> <u>Mark.moench@pacificorp.com</u>

RANDALL C. BUDGE