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Attorney for P4 Production, L.L.C., an affiliate of Bayer Corporation

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF COMMISSION
STAFF'S APPLICATION TO UPDATE
INPUTS TO THE "SURROGATE AVOIDED
RESOURCE" METHOD AVOIDED COST
RATES

CASE NO. GNR-E-22-01

BAYER PETITION FOR
LEAVE TO INTERVENE

P4 Production, L.L.C., an affiliate of Bayer Corporation (referred to herein as "Bayer"), hereby petitions the Idaho Public Utilities Commission for leave to intervene in this matter pursuant to Rules 71 and 72 of the Rules of Procedure of the Commission. In support of this Petition, Bayer states as follows:

1. The name and address of Bayer is:

Bayer Corporation
P4 Production, L.L.C.
Mike Veile
P.O. Box 816
Soda Springs, Idaho 83276
E-Mail: mike.veile@bayer.com

2. Bayer will be represented by Racine Olson, PLLP. All pleadings and other documents should be served to the following:

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3. Bayer is an Idaho electric utility ratepayer and a customer of PacifiCorp. Bayer has a direct and substantial interest in this proceeding because its electricity rates depend in part upon natural gas forecasts and avoided cost rates. While Bayer is not a qualifying facility (“QF”) under the Public Utility Regulatory Policies Act of 1978, Bayer is a special contract customer of Rocky Mountain Power, under which Bayer receives a credit for interruptibility whose value may be affected by the natural gas forecast used to calculate avoided cost rates. Furthermore, avoided costs paid to QFs are included in Rocky Mountain Power’s Net Power Costs (“NPC”). As a substantially large load in Idaho and the PacifiCorp system as a whole, any increases in NPC can materially affect Bayer’s total electricity costs paid to PacifiCorp. Without the opportunity to intervene herein, Bayer would be unable to effectively participate in the Commission’s determination of issues which may affect its rates for electric service.
4. Allowing Bayer to intervene in this matter will not unduly broaden the issues.

Based on the foregoing, Bayer respectfully requests that the Commission grant to Bayer leave to intervene in this proceeding, with all rights afforded to a party under the Rules of Procedure of the Commission.

DATED this 12th day of May, 2022.

RACINE OLSON, PLLP

By: 
THOMAS J. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 12th day of May, 2022, I served a true, correct and complete copy of the foregoing document by email to each of the following:

Commission Secretary
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