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August 16, 2017 DAHO PUBLIC UTILITIES COMMISSION

Diane Hanian, Commission Secretary Idaho Public Utilities Commission PO Box 83720 Boise, Idaho 83720-0074 diane.holt@puc.idaho.gov

Re: IPUC Case No. PAC-E-17-03

Dear Ms. Hanian:

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,

Fauldelf C. Budge

RANDALL C. BUDGE

RCB:ts

Randall C. Budge, ISB No. 1949 Thomas J. Budge, ISB No. 7465 RACINE, OLSON, NYE & BUDGE, CHARTERED P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391 Telephone: (208) 232-6101 Fax: (208) 232-6109 rcb@racinelaw.net RECEIVED

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ENDER PUBLIC

Attorneys for Intervenor Monsanto Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE FILING BY PACIFICORP DBA ROCKY MOUNTAIN POWER OF ITS 2017 INTEGRATED RESOURCE PLAN

CASE NO. PAC-E-17-03

PETITION FOR MONSANTO COMPANY FOR LEAVE TO INTERVENE

<u>PETITION OF MONSANTO COMPANY</u> <u>FOR LEAVE TO INTERVENE</u>

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 James R. Smith P.O. Box 816 Soda Springs, Idaho 83276 Fax: 208-547-3312 E-Mail: jim.r.smith@monsanto.com

This Intervenor will be represented by:

Randall C. Budge Thomas J. Budge Racine, Olson, Nye & Budge, Chartered P.O. Box 1391; 201 E. Center

PETITION OF MONSANTO COMPANY FOR LEAVE TO INTERVENE - 1

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 Thomas J. Budge Racine, Olson, Nye & Budge, Chartered P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391 Telephone: (208) 232-6101 Fax: (208) 232-6109 E-mail: <u>rcb@racinelaw.net</u> tjb@racinelaw.net

Brubaker & Associates 16690 Swingley Ridge Rd., #140 Chesterfield, MO 63017 E-Mail: <u>bcollins@consultbai.com</u> <u>kiverson@consultbai.com</u>

(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 16th day of August, 2017.

RACINE, OLSON, NYE & BUDGE, CHARTERED

By:

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CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 16th day of August, 2017, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Diane Hanian, Commission Secretary (original and 7) Idaho Public Utilities Commission P.O. Box 83720 Boise, ID 83720-0074 E-mail: diane.holt@puc.idaho.gov

Ted Weston Idaho Regulatory Affairs Manager Rocky Mountain Power 1407 West North Temple, Suite 330 Salt Lake City, Utah 84116 Telephone: (801) 220-2963 Email: <u>ted.weston@pacificorp.com</u>

Yvonne R. Hogle, Assistant General Counsel Rocky Mountain Power 1407 West North Temple, Suite 320 Salt Lake City, Utah 84116 Telephone: (801) 220-4050 Email: yvonne.hogle@pacificorp.com U.S. Mail + Email

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