



RANDALL C. BUDGE
randy@racineolson.com

April 22, 2020

Sent Via Email

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IDAHO PUBLIC
UTILITIES COMMISSION

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

Re: IPUC Case No. PAC-E-20-04

Dear Ms. Hanian:

Attached please find for electronic filing Monsanto's *Petition of Monsanto Company for Leave to Intervene*. Please file the same with the Commission's records. The original and seven (7) copies of the Petition will be following by U.S. Mail. If you have any questions, please do not hesitate to contact us.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink that reads 'Randall C. Budge'.

RANDALL C. BUDGE

RCB:ts
cc: Service List

Randall C. Budge, ISB No. 1949
Thomas J. Budge, ISB No. 7465
RACINE OLSON, PLLP
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Attorneys for Intervenor Monsanto Company, a member of the Bayer group of companies

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION
OF ROCKY MOUNTAIN POWER FOR A
DEFERRED ACCOUNTING ORDER
REGARDING COSTS INCURRED DUE TO
THE COVID-19 PUBLIC HEALTH
EMERGENCY**

CASE NO. PAC-E-20-04
**PETITION FOR MONSANTO
COMPANY FOR LEAVE TO
INTERVENE**

COMES NOW Monsanto Company, a member of the Bayer group of companies, 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.smith1@bayer.com

This Intervenor will be represented by:

Randall C. Budge
Thomas J. Budge
Racine Olson, PLLP
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:

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Brubaker & Associates
Brian C. Collins
Maurice Brubaker
16690 Swingley Ridge Rd., #140
Chesterfield, MO 63017
E-Mail: bcollins@consultbai.com
mbrubaker@consultbai.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 22nd day of April, 2020.

RACINE OLSON, PLLP

By: 
RANDALL C. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 22nd day of April, 2020, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

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

Email + U.S. Mail

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