

RANDALL C. BUDGE randy@racineolson.com

June 2, 2021

Sent Via Email

Jan Norkyuki
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720, Boise ID 83720-0074
11331 W. Chinden Blvd, Bldg. 8, Suite 201-A
Boise, ID 83714

Jan.noriyuki@puc.idaho.gov

Re: IPUC Case No. PAC-E-21-07

Dear Ms. Norkyuki:

Attached please find for electronic filing *Petition of Bayer Corporation for Leave to Intervene* regarding the above-referenced matter. Please file the same with the Commission's records. If you have any questions, please do not hesitate to contact us.

Thank you for your assistance.

Sincerely,

RANDALL C. BUDGE

RCB:ts

cc: Service List

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

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR AUTHORITY TO INCREASE ITS RATES AND CHARGES IN IDAHO AND APPROVAL OF PROPOSED ELECTRIC SERVICE SCHEDULES AND REGULATIONS CASE NO. PAC-E-21-07

PETITION OF BAYER CORPORATION FOR LEAVE TO INTERVENE

COMES NOW P4 Production, L.L.C., an affiliate of Bayer Corporation (hereinafter "Bayer" or "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 the Intervenor is:

Bayer Corporation P4 Production, L.L.C. James R. Smith 371 S. 3rd West Soda Springs, Idaho 83276

Fax: 208-547-3312

E-Mail: jim.r.smith@icloud.com

Bayer Corporation P4 Production, L.L.C. Mike Veile P.O. Box 816 Soda Springs, Idaho 83276

Fax: 208-547-3312

E-Mail: mike.veile@bayer.com

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

E-mail: <u>randy@racineolson.com</u> tj@racineolson.com

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, PLLP P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391 Telephone: (208) 232-6101

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Brubaker & Associates Brian C. Collins Maurice Brubaker 16690 Swingley Ridge Rd., #140 Chesterfield, MO 63017

E-Mail: <u>bcollins@consultbai.com</u>

mbrubaker@consultbai.com

- (2) 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, 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, Intervenor requests that this Commission confirm 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 2nd of June, 2021.

RACINE OLSON, PLLP

By:

RANDALL C. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 2nd day of June, 2021, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Jan Norkyuki Commission Secretary Idaho Public Utilities Commission P.O. Box 83720, Boise ID 83720-0074 11331 W. Chinden Blvd, Bldg. 8, Suite 201-A Boise, ID 83714

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