



RANDALL C. BUDGE
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April 19, 2021

Sent Via Email & US Mail

Jan Norkyuki
Commission Secretary
Idaho Public Utilities Commission
P.O. Box 83720, Boise ID 83720-0074
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RECEIVED
2021 APR 19 PM 12:30
IDAHO PUBLIC UTILITIES COMMISSION

Re: IPUC Case No. PAC-E-21-09

Dear Ms. Hanian:

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. 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,


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
REQUESTING APPROVAL OF \$16.1
MILLION NET POWER COST DEFERRAL**

**CASE NO. PAC-E-21-09
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
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and requests that copies of all pleadings and production requests and responses should be provided to the following:

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(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 19th day of April, 2021.

RACINE OLSON, PLLP

By: Randall C. Budge
RANDALL C. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 19th day of April, 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
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