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*Attorneys for 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 A  
CERTIFICATE OF CONVENIENCE AND  
NECESSITY AUTHORIZING  
CONSTRUCTION OF THE BOARDMAN-  
TO-HEMINGWAY 500-KV TRANSMISSION  
LINE PROJECT

**CASE NO. PAC-E-23-01**

**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:

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

2. Bayer will be represented by:

Thomas J. Budge  
Racine Olson, PLLP  
P.O. Box 1391; 201 E. Center  
Pocatello, Idaho 83204-1391  
E-mail: tj@racineolson.com

3. All pleadings and other documents should be served upon:

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E-mail: tj@racineolson.com

Brian C. Collins  
Greg Meyer  
Brubaker & Associates  
16690 Swingley Ridge Rd., #140  
Chesterfield, MO 63017  
E-mail: bcollins@consultbai.com  
gmeyer@consultbai.com

4. Bayer has a direct and substantial interest in this proceeding and intends to participate in all respects as a party to represent its interests.

5. Without the opportunity to intervene, Bayer would be without a manner or means of participating in the lawful determination of issues which will affect its rates for electric service.

Therefore, Bayer respectfully requests that the Commission grant this petition for leave to intervene and allow Bayer to appear and participate in all matters as may be necessary and appropriate; to present evidence, call and examine witnesses, cross-examine witnesses, and present argument; and to otherwise fully participate in this proceeding.

DATED this 13<sup>th</sup> day of February, 2023.

RACINE OLSON, PLLP

By:   
THOMAS J. BUDGE

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 13<sup>th</sup> day of February, 2023, I served a true, correct and complete copy of the foregoing document by email to each of the following:

***Idaho Public Utilities Commission***

Commission Secretary  
P.O. Box 83720  
Boise, ID 83720-0074  
secretary@puc.idaho.gov

Riley Newton, Deputy Attorney General  
riley.newton@puc.idaho.gov

***PacifiCorp***

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***Idaho Irrigation Pumpers Association***

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