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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
REQUESTING APPROVAL OF \$32.5
MILLION ECAM DEFERRAL

CASE NO. PAC-E-23-09

BAYER PETITION OF 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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Brian C. Collins
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16690 Swingley Ridge Rd., #140
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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 20th day of April, 2023.

RACINE OLSON, PLLP

By: 
THOMAS J. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 20th day of April, 2023, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Idaho Public Utilities Commission

Commission Secretary
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