Thomas J. Budge, ISB No. 7465 RACINE OLSON, PLLP P.O. Box 1391; 201 E. Center St. Pocatello, Idaho 83204-1391 (208) 232-6101 tj@racineolson.com

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 AUTHORITY TO INCREASE ITS RATES AND CHARGES IN IDAHO AND APPROVAL OF PROPOSED ELECTRIC SERVICE SCHEDULES AND REGULATIONS

CASE NO. PAC-E-24-04

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:

Thomas J. Budge Racine Olson, PLLP P.O. Box 1391; 201 E. Center Pocatello, Idaho 83204-1391 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

Kevin Higgins Neal Townsend Energy Strategies LLC 111 East Broadway, Suite 1200 Salt Lake City, UT, 84111

Email: khiggins@energystrat.com ntownsend@energystrat.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 13th day of June, 2024.

RACINE OLSON, PLLP

THOMAS L BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 13th day of June, 2024, 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 P.O. Box 83720 Boise, ID 83720-0074 secretary@puc.idaho.gov

PacifiCorp

Data Request Response Center datarequest@pacificorp.com

Mark Alder Idaho Regulatory Affairs Manager mark.alder@pacificorp.com

Joe Dallas Senior Attorney Rocky Mountain Power joseph.dallas@pacificorp.com

Idaho Irrigation Pumpers Association

Eric L. Olsen *ECHO HAWK & OLSEN, PLLC* elo@echohawk.com

Lance Kaufman, Ph.D. lance@aegisinsight.com

PIIC

Ronald L. Williams HAWLEY TROXELL rwilliams@hawleytroxell.com

PIIC Electronic Service Only:

Val Steiner: Val.Steiner@itafos.com Kyle Williams: williamsk@byui.edu Adam Gardner: AGardner@idahoan.com

THOMAS J. BUDGE