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March 13, 2013

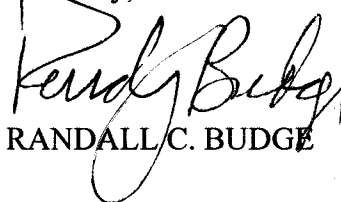
Mrs. Jean Jewell, Secretary
Idaho Public Utilities Commission
472 W. Washington Street
Boise, Idaho 83702-5918
Overnight Mail and Email (jjewel@puc.state.id.us)

Re: PAC-E-13-03 (ECAM)

Dear Jean:

Enclosed for filing in the captioned matter please find the original and three copies of *Monsanto Company's Comments* in Case No. PAC-E-13-01. Thank you for your assistance.

Sincerely,


RANDALL C. BUDGE

RCB:rr

Enclosures

cc: Ted Weston/RMP
Yvonne Hogle/RMP

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Attorneys for Intervenor Monsanto Company

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF)
ROCKY MOUNTAIN POWER FOR)
AUTHORITY TO INCREASE RATES BY)
\$2.2 MILLION TO RECOVER DEFERRED NET)
POWER COSTS THROUGH THE ENERGY)
COST ADJUSTMENT MECHANISM)
)
)
)

Case No. PAC-E-13-03

COMMENTS OF MONSANTO COMPANY

INTRODUCTION

COMES NOW Intervenor Monsanto Company ("Monsanto") through counsel and submits these Comments with respect to the February 1, 2013 Application of PacifiCorp, d/b/a Rocky Mountain Power ("Company") seeking authorization to increase rates by \$2.2 million to recover deferred net power costs through the Energy Cost Adjustment Mechanism (ECAM). Monsanto's Comments are in response to the Commission's Order No. 32478 dated February 20, 2013, giving notice of the Application, that this matter will proceed under Modified Procedure, authorizing interested persons to file written comments in support or opposition, and providing rights or participation by filing a Petition to Intervene. Monsanto previously timely filed its Petition to Intervene dated February 27, 2013.

MONSANTO COMMENTS

Based on review of the testimony, exhibits and responses to data requests in this case, Monsanto agrees with the Company's calculations and propose no adjustment to the proposed ECAM deferral account balances or ECAM rates. Monsanto has three general comments to make regarding the Company's application.

First, consistent with Monsanto's previous comments in the prior ECAM application, Case No. PAC-E-12-3 and as noted in the Commission's Order No. 32597, Monsanto requests that treatment of interrupted energy in the ECAM be preserved for debate and resolution in the Company's next general rate case filing.

Second, we also ask that the Company continue to transmit copies of its quarterly ECAM reports, and other relevant information relating to the ECAM filing to all interested parties, including Monsanto subject to confidentiality. The Commission previously determined that providing relevant information on a quarterly basis will enable "a full and insightful analysis of the Company's ECAM Application..." Order No 32554 at 8. As a result the Commission directed the Company to transmit copies of its quarterly ECAM reports, and other relevant information relating to the ECAM filing, to all interested parties, including Monsanto. Order No. 32597 at 8. Accordingly, the Commission should make it clear that this information should continue to be provided to Monsanto and other interested parties in the future. Since ECAM proceedings are typically handled by modified procedure this will enable customers to track potential rate impacts and analyze the calculations in advance and thus facilitate timely and meaningful review and comment.

Third, Monsanto requests that one particular component of the ECAM calculation warrants additional review in the next general rate case. This area of concern is with the "monthly adjustment factors for moving wholesale energy sales." These monthly adjustment factors are determined by comparing the monthly Idaho jurisdictional energy loads to the monthly customer class loads from the cost of service study. The methodology for determining these factors, as well as their application, was developed as the result of discussions between the parties in the last ECAM filing, Case No. PAC-E-12-03.

Based on energy loads from the most recent general rate case, Case No. PAC-E-11-12, the monthly adjustment factors used for this ECAM filing show huge swings, from a high of

23% down to a low of *negative* 13.6%:

January	0.19 %
February	-1.07 %
March	2.61 %
April	4.56 %
May	16.62 %
June	23.00 %
July	14.22 %
August	-13.63 %
September	-8.76 %
October	-2.75 %
November	10.47 %

In contrast, the adjustment factors the parties looked at in Case No. PAC-E-12-03 ranged from a high of 7.3% to a low of roughly 0% (- 0.007%). Clearly the factors in this ECAM application are much more divergent.

The Company maintains the adjustment factors are primarily attributable to moving wholesale energy, and generally speaking, are also attributable to the different methods used to develop jurisdictional loads and cost of service loads. These factors are important to Monsanto as they are applied to the actual loads of Monsanto in determination of their Net Power Cost ("NPC") deferral balances. Obviously, these adjustments can substantially alter the amount of NPC balances, particularly when a large positive monthly adjustment factor is paired with a large monthly NPC rate. Monsanto recommends that the huge swings in these factors warrant special review in the next general rate case as to the nature and source of such discrepancies and whether it makes sense to adjust Monsanto's actual loads by these factors for the Net Power Cost deferral balance.

RESPECTFULLY SUBMITTED this 13th day of March, 2013.

RACINE, OLSON, NYE, BUDGE &
BAILEY, CHARTERED

By _____
RANDALL C. BUDGE

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 13th day of March, 2013, I served a true, correct and complete copy of the foregoing document, to each of the following, via the method so indicated:

Jean D. Jewell, Secretary (original and 7)
Idaho Public Utilities Commission
472 W. Washington Street
Boise, ID 83702
E-mail: jjewell@puc.state.id.us

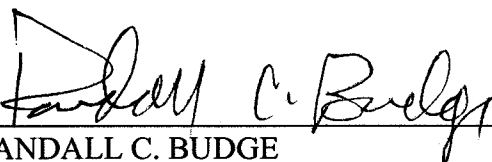
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