

February 20, 2015

**VIA HAND DELIVERY**

Jean D. Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, Idaho 83702

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2015 FEB 20 PM 2:16  
IDAHO PUBLIC  
UTILITIES COMMISSION

**Re: Case No. IPC-E-15-01**  
**In the Matter of Idaho Power Company's Petition to Modify Terms and Conditions**  
**of Prospective PURPA Energy Sales Agreements**

Dear Ms. Jewell:

Please find enclosed an original and seven (7) copies of Micron Technology, Inc.'s Petition to Intervene in the above referenced proceeding.

Should you have any questions regarding the enclosed, please do not hesitate to contact me. Thank you for your assistance.

Very truly yours,



Pamela S. Howland  
of Holland & Hart LLP

PSH:bcs

Enclosures

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IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for Micron Technology, Inc.

**BEFORE THE**

**IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER	)	CASE NO. IPC-E-15-01
COMPANY'S PETITION TO MODIFY	)	
TERMS AND CONDITIONS OF	)	PETITION TO INTERVENE
PROSPECTIVE PURPA ENERGY SALES	)	OF MICRON TECHNOLOGY, INC.
AGREEMENTS	)	
	)	

COMES NOW, Micron Technology, Inc. ("Micron" or "Intervenor"), and pursuant to this Commission's Rules of Procedure, Rule 071 IDAPA 31.01.01.071, hereby petitions the Commission for leave to intervene herein and to appear and participate herein as a party, and as grounds therefore states:

1. The name and address of this Intervenor is:

Micron Technology, Inc.  
c/o Frederick J. Schmidt  
Holland & Hart LLP  
377 South Nevada Street

PETITION TO INTERVENE  
IPC-E-12-24

Carson City, NV 89703  
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Copies of all pleadings, production requests, production responses, commission orders, and other documents should be provided to:

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2. This Intervenor, Micron, is Idaho Power Company's largest individual electricity customer. Micron receives electric utility services from Idaho Power Company as a special-contract customer. The disposition of Idaho Power Company's underlying petition in this case may have a substantial effect on customer rates; therefore Micron claims a direct and substantial interest in this proceeding because its rates for service from Idaho Power Company may be substantially affected by the outcome of this proceeding.

3. This Intervenor intends to participate herein as a party, and if necessary, to introduce evidence, cross-examine witnesses, call and examine witnesses, and be heard in argument. The nature and quality of evidence which this Intervenor will introduce is dependent upon the nature and effect of other evidence in this proceeding.

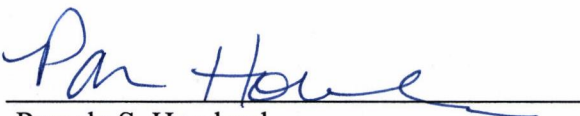
4. Without the opportunity to intervene herein, this Intervenor would be without adequate means of participation in this proceeding that may have a material impact on its electric rates and terms and conditions of service.

5. Granting Micron's petition to intervene will not unduly broaden the issues in this case, nor will it prejudice any party to this case.

**WHEREFORE**, Micron Technology, Inc. respectfully requests that this Commission grant its Petition 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, present argument, and to otherwise fully participate in these proceedings.

DATED this 20th day of February, 2015.

HOLLAND & HART, LLP

By:   
Pamela S. Howland  
Frederick J. Schmidt (*Pro Hac Vice*  
*Application Forthcoming*)

Attorneys for Micron Technology, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of February, 2015, a true and correct copy of the within and foregoing **PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-15-01** was served in the manner shown to:

**Commission Staff**

Jean Jewell (original, plus 7 copies)  
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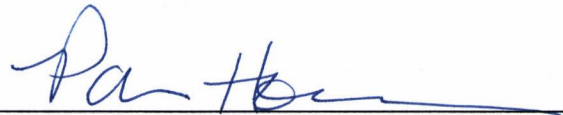
**Renewable Energy Coalition**

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