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2019 MAY -2 AM 10: 25

IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for Micron Technology, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF) CASE NO. IPC-E-18-15
IDAHO POWER COMPANY TO STUDY)
THE COSTS, BENEFITS, AND) PETITION TO INTERVENE
COMPENSATION OF NET EXCESS) OF MICRON TECHNOLOGY, INC.
ENERGY SUPPLIED BY CUSTOMER ON-)
SITE GENERATION)
_____)

Micron Technology, Inc. ("Micron" or "Intervenor"), pursuant to this Commission's Rules of Procedure, Rules 71-73 IDAPA 31.01.01.71-73, hereby petitions the Commission for leave to intervene and to appear and participate in these proceedings as a party, and as grounds therefore states:

- 1. The name and address of this Intervenor is:

Micron Technology, Inc.
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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. Micron recognizes that this Petition to Intervene is being filed well after the November 30, 2018 deadline established to intervene in this proceeding. Concurrent with this Petition to Intervene, Micron is filing a timely Petition to Intervene in Case No. IPC-E-19-15. Micron understands that the Commission is considering consolidating this proceeding with Case No. IPC-E-19-15 to determine the single issue of the value of net excess energy for all on-site generation classes (Schedules 6, 8, 84). Micron therefore seeks late intervention in this proceeding to ensure that its interests are represented in this proceeding, Case No. IPC-E-19-15, or a combined proceeding, depending on how the Commission determines it will proceed with the related cases. The potential for this proceeding to be combined with the recently-initiated Case No. IPC-E-19-15 has just arisen. Therefore, Micron's delay for seeking intervention in this proceeding is reasonable. Micron will abide by orders and notices entered earlier in this proceeding in accordance with IDAPA 31.01.01.73. Micron's intervention will not result in disruption in this proceeding, prejudice to existing parties, or undue broadening of the issues presented in this proceeding.

3. Micron receives electric utility services from Idaho Power (“Idaho Power”) as a Special Contract customer. Micron is Idaho Power’s single largest customer. In this proceeding and Proceeding No. IPC-E-19-15, Idaho Power seeks to set a just, reasonable, and sustainable value of net excess energy for all on-site generation classes under Schedules 6, 8, and 84. Micron also seeks to ensure that compensation paid to customers with on-site generation does not result in inappropriate cost shifts to customers without on-site generation. As a large customer, Micron is particularly susceptible to the impact of potential cost shifts to customers without on-site generation. Therefore, Micron has a direct and substantial interest in this proceeding.

4. Micron 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 Micron will introduce is dependent upon the nature and effect of other evidence in this proceeding.

5. Without the opportunity to intervene herein, Micron 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.

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.

Respectfully submitted May 2, 2019.

HOLLAND & HART, LLP

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2019, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-18-15 was served in the manner shown to:

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s/ Gina Gargano-Amari
