

RECEIVED

2019 MAY -2 AM 10: 28

IDAHO PUBLIC  
UTILITIES COMMISSION

Austin Rueschhoff, ISB No. 10592  
Thorvald A. Nelson  
HOLLAND & HART LLP  
6380 South Fiddlers Green Circle, Ste. 500  
Greenwood Village, CO 80111  
Telephone: (303) 290-1600  
Facsimile: (720) 235-0229  
Email: [darueschhoff@hollandhart.com](mailto:darueschhoff@hollandhart.com)  
[tnelson@hollandhart.com](mailto:tnelson@hollandhart.com)

Attorneys for Micron Technology, Inc.

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER'S	)	CASE NO. IPC-E-19-15
APPLICATION TO EVALUATE SCHEDULE	)	
84 – NET METERING	)	MICRON TECHNOLOGY INC.'S
	)	FORMAL COMMENTS
_____	)	

Micron Technology, Inc. ("Micron" or "Intervenor"), pursuant to this Commission's Notice of Application and Notice of Procedural Comment Deadline, Order No. 34315, filed on April 18, 2019, hereby submits its formal written comments in response to the Commission's request for comment on the following issues:

1. Whether and to what extent this Application impacts or is impacted by IPC-E-18-15 and IPC-E-18-16.

Although Micron has not participated in IPC-E-18-15 or IPC-E-18-16 to date, Micron understands that those two dockets, along with this docket (together the "Net-Metering Dockets"), all relate to the issue of net-metering of customers who have installed on-site generation, the compensation paid for net excess energy, and related rate design and fixed-cost issues. Therefore, it is likely that information produced in each proceeding will inform or impact decisions made in all of the Net-Metering Dockets.

2. Whether and to what extent the issues raised in IPC-E-18-15, IPC-E-18-16 and this docket can and should be examined holistically.

Micron supports the Commission's adoption of a procedural regime in the Net-Metering Dockets that allows the Commission, Idaho Power, and the Intervenors to come to a just and reasonable outcome in the Net-Metering Dockets in an efficient manner. It is Micron's belief that some consolidation of the Net-Metering Dockets will achieve efficiencies that will allow the parties to meaningfully engage in the Net-Metering Dockets while conserving time and resources. Such consolidation will also ensure that the information and processes are consistent among the Net-Metering Dockets. To that end, Micron is supportive of Idaho Power's recommendation to process the Net-Metering Dockets as presented on page 8 of Idaho Power's Application. Because a process for considering the separate issues of (a) the value of net excess energy; and (b) rate design and fixed-cost issues in two separate dockets (IPC-E-18-15 and IPC-E-18-16) has already been established and is well underway, Micron believes that efficiency will be furthered by continuing in this manner. Maintaining separate dockets for valuation and rate design issues will also allow parties to efficiently focus resources on the issues most important to their particular interests.

3. Whether this docket should be processed according to Idaho Power's proposal on page 8 of the Application.

Micron agrees with Idaho Power's proposal to process this docket as presented on page 8 of the Application. See Micron's response to item 2, above.

4. Whether the Commission should process this docket by modified procedure or by hearings.

Although Micron is currently not a party to IPC-E-18-15 and IPC-E-18-16, it is Micron's understanding that the parties in those dockets are working in a collaborative manner to find solutions to the issues presented in these dockets. Micron is supportive of Idaho Power's request to approach this proceeding with a similar collaborative process. As necessary to resolve any conflicts, Micron would have no objection to processing this case using modified procedures.

5. Whether the Commission should suspend Schedule 84 for new applicants while IPC-E-19-15 is being processed, and if the Commission does suspend Schedule 84 in the interim, whether the suspension should be from the date of filing—April 5, 2019—or some other date.

Micron supports Idaho Power's request to suspend Schedule 84 during the pendency of this proceeding. The information provided by Idaho Power demonstrates that the current Schedule 84 pricing for excess net energy is not aligned with the costs and benefits of on-site generation, causing a potentially unreasonable growth of new irrigation net metering customers installing on-site generation systems near the maximum allowed capacity. Indeed, it is this sudden boom of new customers seeking service under Schedule 84 that has caused Idaho Power to initiate this proceeding and request expeditious consideration. Failure to suspend Schedule 84 during the pendency of this proceeding would allow many more customers to seek service under the potentially unsustainable and unreasonable current provisions of Schedule 84.

In its Application, Idaho Power also presented a concern that the current iteration of Schedule 84 may create inappropriate cost shifts to customers without on-site generation. Further customers currently seeking service under Schedule 84 may be planning large investments in self-generation based on an unsustainable economic model. Combined, these facts demonstrate that it

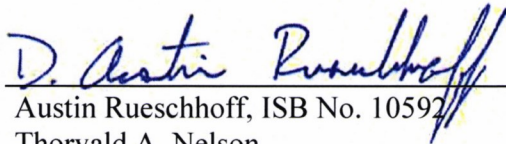
is in everyone's best interest for the Commission to suspend Schedule 84 during the pendency of this proceeding with an April 5, 2019 suspension date.

6. Whether the Company's proposed effective date of January 1, 2020, in IPC-E-19-15 is feasible.

Micron has no comment on this issue.

Respectfully submitted May 2, 2019.

HOLLAND & HART, LLP

By:   
Austin Rueschhoff, ISB No. 10592  
Thorvald A. Nelson  
6380 South Fiddlers Green Circle, Ste. 500  
Greenwood Village, CO 80111  
Telephone: (303) 290-1600  
Facsimile: (720) 235-0229  
Email: darueschhoff@hollandhart.com  
tnelson@hollandhart.com

Attorneys for Micron Technology, Inc.



## CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2019, a true and correct copy of the within and foregoing MICRON TECHNOLOGY INC.'s FORMAL COMMENTS was served in the manner shown to:

### UPS

Diane Hanian  
Commission Secretary (Original and seven copies provided)  
Idaho Public Utilities Commission  
427 W. Washington Street  
Boise, ID 83702-5983

### Electronic Mail

*Idaho Power Company*  
Lisa D. Nordstrom  
Idaho Power Company  
1221 W. Idaho Street (83702)  
PO Box 70  
Boise, ID 83707-0070  
[lnordstrom@idahopower.com](mailto:lnordstrom@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

*Commission Staff*  
Edward Jewell  
Deputy Attorney General  
Idaho Public Utilities Commission  
472 W. Washington (83702)  
PO Box 83720  
Boise, ID 83720-0074  
[edward.jewell@puc.idaho.gov](mailto:edward.jewell@puc.idaho.gov)

*Idaho Irrigation Pumpers Association, Inc.*  
Eric L. Olsen  
Echo Hawk & Olsen PLLC  
505 Pershing Avenue, Suite 100  
PO Box 6119  
Pocatello, ID 83205  
[elo@echohawk.com](mailto:elo@echohawk.com)

*City of Boise City*  
Abigail R. Germaine  
Deputy City Attorney  
Boise City Attorney's Office

Tim Tatum  
Connie Aschenbrenner  
Idaho Power Company  
1221 W. Idaho Street (83702)  
PO Box 70  
Boise, ID 83707-0070  
[ttatum@idahopower.com](mailto:ttatum@idahopower.com)  
[caschenbrenner@idahopower.com](mailto:caschenbrenner@idahopower.com)

*Idaho Conservation League*  
Benjamin J. Otto  
Idaho Conservation League  
710 N. 6th Street  
Boise, ID 83702  
[botto@idahoconservation.org](mailto:botto@idahoconservation.org)

Anthony Yankel  
12700 Lake Avenue, Unit 2505  
Lakewood, OH 44107  
[tony@yankel.net](mailto:tony@yankel.net)

*ID Clean Energy Association*  
Preston N. Carter  
Givens Pursley LLP  
601 W. Bannock Street

105 N. Capitol Blvd.  
PO Box 500  
Boise, ID 83701-0500  
[agermaine@cityofboise.org](mailto:agermaine@cityofboise.org)

*Russell Schiermeier*  
Russell Schiermeier  
29393 Davis Road  
Bruneau, ID 83604  
[buyhay@gmail.com](mailto:buyhay@gmail.com)

*Micron Technology, Inc.*  
Jim Swier  
Micron Technology, Inc.  
8000 South Federal Way  
Boise, ID 83707  
[jswier@micron.com](mailto:jswier@micron.com)

Boise, ID 83702  
[prestoncarter@givenspursley.com](mailto:prestoncarter@givenspursley.com)

Austin Rueschhoff  
Thorvald A. Nelson  
Holland & Hart, LLP  
6380 S. Fiddlers Green Circle, Suite 500  
Greenwood Village, CO 80111  
[darueschhoff@hollandhart.com](mailto:darueschhoff@hollandhart.com)  
[tnelson@hollandhart.com](mailto:tnelson@hollandhart.com)  
[aclee@hollandhart.com](mailto:aclee@hollandhart.com)  
[glgargano-amari@hollandhart.com](mailto:glgargano-amari@hollandhart.com)

*s/ Gina Gargano-Amari*

---