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IDAHO PUBLIC STILITIES COMMISSION

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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)	PETITION TO INTERVENE
)	OF MICRON TECHNOLOGY, INC.
)	

Micron Technology, Inc. ("Micron" or "Intervenor"), pursuant to this Commission's Rules of Procedure, Rule 71 IDAPA 31.01.01.71, 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. c/o Austin Rueschhoff Thorvald A. Nelson Holland & Hart LLP 6380 S. Fiddlers Green Circle, Ste. 500 Greenwood Village, CO 80111 Telephone: 303-290-1600 Fax: 303-290-1606 darueschhoff@hollandhart.com tnelson@hollandhart.com

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

1 MICRON TECHNOLOGY, INC. PETITION TO INTERVENE IPC-E-19-15 Jim Swier Micron Technology, Inc. 8000 South Federal Way Boise, ID 83707 jswier@micron.com Austin Rueschhoff Thorvald A. Nelson Holland & Hart, LLP 6380 S. Fiddlers Green Circle, Ste. 500 Greenwood Village, CO 80111

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- 2. 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, Idaho Power seeks to ensure that compensation paid to customers with on-site generation under Schedule 84 is just, reasonable, and sustainable. Idaho Power is also concerned that the current compensation paid under Schedule 84 could create 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.
- 3. 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.
- 4. Granting Micron's Petition to Intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

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

Bv:

Austin Rueschhoff, ISB No. 10592

Thorvald A. Nelson

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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-19-15 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

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MICRON TECHNOLOGY, INC. PETITION TO INTERVENE IPC-E-19-15

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