BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY’S 2019 INTEGRATED RESOURCE PLAN ) CASE NO. IPC-E-19-19
PETITION TO INTERVENE ) PETITION TO INTERVENE
OF MICRON TECHNOLOGY, INC. )

Micron Technology, Inc. (“Micron” or “Intervenor”), pursuant to the 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
555 17th Street, Suite 3200
Denver, CO 80202
Telephone: 303-295-8000
Fax: 720-235-0229
darueschhoff@hollandhart.com
tnelson@hollandhart.com

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

MICRON TECHNOLOGY, INC. PETITION TO INTERVENE
IPC-E-19-19
2. Micron receives electric utility services from Idaho Power ("Idaho Power") as a Special Contract customer. Micron is Idaho Power’s single largest customer. Micron also participated in the Idaho Power Integrated Resource Plan Advisory Council. Idaho Power’s 2019 Integrated Resource Plan filing is intended to identify a preferred resource portfolio that will enable Idaho Power to reliably serve its customers over the 20-year planning period. Numerous assumptions were made about what will occur during the 20-year planning period. The outcome of this proceeding may impact Idaho Power’s rates for service and ability to reliably serve Micron. 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.

MICRON TECHNOLOGY, INC. PETITION TO INTERVENE
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WHEREFORE, Micron Technology, Inc. respectfully requests that the Commission grant its Petition to Intervene in this proceeding 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 this proceeding.


HOLLAND & HART, LLP

By: [Signature]

Austin Rueschhoff, ISB No. 10592
Thorvald A. Nelson
555 17th Street, Suite 3200
Denver, CO 80202
Telephone: (303) 295-8000
Facsimile: (720) 235-0229
Email: darueschhoff@hollandhart.com
tnelson@hollandhart.com

Attorneys for Micron Technology, Inc.
CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2020, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-19-19 was served in the manner shown to:

Hand Delivery

Diane Hanian
Commission Secretary (Original and seven copies provided)
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Building 8, Suite 201-A
Boise, ID 83714

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
dockets@idahopower.com

Idaho Conservation League
Benjamin J. Otto
Idaho Conservation League
710 N. 6th Street
Boise, ID 83702
botto@idahoconservation.org

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

Idahydro
C. Tom Arkoosh
ARKOOSH LAW OFFICES
802 W. Bannock Street, Suite LP 103
P.O. Box 2900
Boise, ID 83701
tom.arkoosh@arkoosh.com
erin.cecil@arkoosh.com

Idaho Power Company
Timothy Tatun
Matthew Larkin
Idaho Power Company
1221 W. Idaho Street (83702)
PO Box 70
Boise, ID 83707-0070
ttatum@idahopower.com
mlarkin@idahopower.com

Idaho Conservation League
Benjamin J. Otto
Idaho Conservation League
710 N. 6th Street
Boise, ID 83702
botto@idahoconservation.org
ICIP
Peter J. Richardson
Richardson Adams, PLLC
515 N. 27th Street
P.O. Box 7218
Boise, ID 83702
peter@richardsonadams.com

Dr. Don Reading
6070 Hill Road
Boise, ID 83703
dreading@mindspring.com

Stop B2H Coalition
Jack Van Valkenburgh
Van Valkenburgh Law, PLLC
P.O. Box 531
Boise, ID 83701
jack@vanvalkenburghlaw.com

Jim Kreider
STOP B2H Coalition
60366 Marvin Rd
La Grande, OR 97850
jim@stopb2h.org

Micron Technology, Inc.
Jim Swier
Micron Technology, Inc.
8000 South Federal Way
Boise, ID 83707
jswier@micron.com

Austin Rueschhoff
Thorvald A. Nelson
Holland & Hart, LLP
555 17th Street, Suite 3200
Denver, CO 80202
darueschhoff@hollandhart.com
tnelson@hollandhart.com
aclee@hollandhart.com
glgarganoamari@hollandhart.com

s/ Adele C. Lee

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