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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-20-26
COMPANY'S APPLICATION FOR)
AUTHORITY TO MODIFY SCHEDULE 84'S) PETITION TO INTERVENE
METERING REQUIREMENT AND TO) OF MICRON TECHNOLOGY, INC.
GRANDFATHER EXISTING CUSTOMERS)
WITH TWO METERS)

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 this proceeding 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 receives electric utility services from Idaho Power Company (“Idaho Power”) as a Special Contract customer. Micron is Idaho Power’s single largest customer. Micron was also an active participant in Idaho Power’s related proceedings IPC-E-18-15 and IPC-E-19-15 regarding customer-owned generation systems connected to the grid and the recovery of fixed and variable costs. Micron seeks to intervene in this proceeding to continue the progress achieved in those proceedings and to ensure that compensation paid to customers with on-site generation under Schedule 84 is just, reasonable, and does not result in unreasonable cost-shifts to customers without on-site generation. As a large customer, Micron is particularly susceptible to the impact of such potential cost shifts. 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.

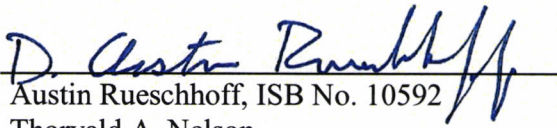
4. Granting Micron’s Petition to Intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

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 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.

Respectfully submitted August 7, 2020.

HOLLAND & HART, LLP

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2020, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-20-26 was served in the manner shown to:

Electronic Mail

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s/ Gina Gargano-Amari _____

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