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IDAHO PUBLIC
UTILITIES COMMISSION

Attorneys for Micron Technology, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER) CASE NO. IPC-E-21-12
COMPANY'S APPLICATION FOR A)
DETERMINATION ACKNOWLEDGING ITS) PETITION TO INTERVENE
NORTH VALMY POWER PLAN EXIT) OF MICRON TECHNOLOGY, INC.
DATE)
_____)

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.
c/o Austin Rueschhoff
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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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Micron Technology, Inc.
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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. Therefore, Micron is particularly susceptible to the rate and service reliability impacts inherent in major Idaho Power resource decisions, including the appropriate timing of Idaho Power’s exit from the North Valmy Power Plant Unit 2. Further, Micron is an active participant in Idaho Power’s Integrated Resource Plan Advisory Council (IRPAC) and was an active participant in Idaho Power’s most recent Integrated Resource Plan proceeding.¹ Micron seeks to intervene in this proceeding to continue the progress it has achieved in those settings. 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 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.

¹ *In the Matter of Idaho Power Company’s 2019 Integrated Resource Plan*, Case No. IPC-E-19-19.

5. Without the opportunity to intervene, Micron would be without adequate means of participation in this proceeding that may have a material impact on its electric rates, service reliability, 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 June 11, 2021.

HOLLAND & HART, LLP

By: 
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Attorneys for Micron Technology, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2021, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-21-12 was served in the manner shown to:

Electronic Mail

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s/ Gina Gargano-Amari
