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IDAHO PUBLIC UTILITIES COMMISSION

Austin Rueschhoff, ISB No. 10592 Thorvald A. Nelson Austin W. Jensen HOLLAND & HART LLP 555 17th Street, Suite 3200 Denver, CO 80202

Telephone: (303) 295-8000 Facsimile: (720) 235-0229

Email: darueschhoff@hollandhart.com tnelson@hollandhart.com awjensen@hollandhart.com

Attorneys for Micron Technology, Inc.

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER	) CASE NO. IPC-E-21-17
COMPANY'S APPLICATION FOR	)
AUTHORITY TO INCREASE ITS RATES	) PETITION TO INTERVENE
FOR ELECTRIC SERVICE TO RECOVER	) OF MICRON TECHNOLOGY, INC.
COSTS ASSOCIATED WITH THE JIM	)
BRIDGER POWER PLANT.	)

Micron Technology, Inc. ("Micron" or "Intervenor"), pursuant to the Commission's Rules of Procedure Rules 71 through 74, 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 Thorvald A. Nelson Austin W. Jensen Holland & Hart LLP 555 17th Street, Suite 3200 Denver, CO 80202

Telephone: 303-295-8000

Fax: 720-235-0229

<sup>&</sup>lt;sup>1</sup> Idaho Admin. Code 31.01.01.071-.074.

darueschhoff@hollandhart.com tnelson@hollandhart.com awjensen@hollandhart.com

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

Jim Swier Micron Technology, Inc. 8000 South Federal Way Boise, ID 83707 jswier@micron.com Austin Rueschhoff
Thorvald A. Nelson
Austin W. Jensen
Holland & Hart, LLP
555 17th Street, Suite 3200
Denver, CO 80202
(303) 295-8000
Fax: (720) 235-0229
darueschhoff@hollandhart.com
tnelson@hollandhart.com
awjensen@hollandhart.com
aclee@hollandhart.com
glgarganoamari@hollandhart.com

- 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 rate increases, including Idaho Power's proposal in this proceeding to accelerate the depreciation schedule for the Jim Bridger Power Plant resulting in an overall rate increase to customers of 2.53%. Therefore, Micron has a direct and substantial interest in this proceeding because Idaho Power's application will affect its rates for electric service.
- 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.
- 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 service rates.

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 July 15, 2021.

HOLLAND & HART, LLP

By: D. Claster Ruddy Austin Rueschhoff, ISB No. 10592

Thorvald A. Nelson Austin W. Jensen

555 17th Street, Suite 3200

Denver, CO 80202

Telephone: (303) 295-8000 Facsimile: (720) 235-0229

Email: darueschhoff@hollandhart.com

tnelson@hollandhart.com awjensen@hollandhart.com

Attorneys for Micron Technology, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2021, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-21-17 was served in the manner shown to:

## Electronic Mail

Idaho Power Company
Lisa D. Nordstrom
Idaho Power Company
1221 W. Idaho Street (83702)
PO Box 70
Boise, ID 83707-0070
Inordstrom@idahopower.com
dockets@idahopower.com

Commission Staff
Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Building 8,
Suite 201-A
Boise, ID 83714
Jan.noriyuki@puc.idaho.gov

Industrial Customers of Idaho Power
Peter J. Richardson
Richardson Adams, PLLC
515 N. 27th Street
P.O. Box 7218
Boise, ID 83702
peter@richardsonadams.com

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

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

Clean Energy Opportunities
Kelsey Jae
Law for Conscious Leadership
920 N. Clover Dr.
Boise, ID 83703
kelsey@kelseyjae.com

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

Sierra Club
Rose Monahan
Ana Boyd
Sierra Club
211 Webster St., Suite 1300
Oakland, CA 94612
rose.monahan@sierraclub.org
ana.boyd@sierraclub.org

City of Boise
Ed Jewell
Deputy City Attorney
Boise City Attorney's Office
150 N. Capitol Blvd.
P.O. Box 500
Boise, ID 83701-0500
BoiseCityAttorney@cityofboise.org
ejewell@cityofboise.org

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

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

s/ Gina Gargano-Amari

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