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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) COMMENTS OF MICRON
FOR ELECTRIC SERVICE TO RECOVER) TECHNOLOGY, INC.
COSTS ASSOCIATED WITH THE JIM)
BRIDGER POWER PLANT)

Micron Technology, Inc. ("Micron"), pursuant to the Commission's Notice of Amended Application dated March 10, 2022, submits its comments regarding Idaho Power Company's ("Idaho Power") Amended Application in this proceeding.

I. Introduction

Micron is Idaho Power's largest customer and relies on Idaho Power's provision of reliable electric service at just and reasonable rates in order to effectively operate its business and remain competitive in the global marketplace. Therefore, Micron is keenly interested in all aspects of Idaho Power's cost of service and service reliability, including Idaho Power's transition away from carbon-emitting resources and the resulting rate impacts to customers. Micron also actively serves

on Idaho Power's Integrated Resource Planning ("IRP") Advisory Council and enjoys working with Idaho Power on these issues in that context.

While reliable service at reasonable rates is a critical component of Idaho Power's electric service, Micron is also interested in the types of resources used to serve its electric load. Micron is supportive of Idaho Power's current transition to cleaner energy. In fact, Micron has established its own sustainability goals,¹ including aggressive efforts to reduce its emissions and power its operations with renewable energy. Micron has long enjoyed a productive working relationship with Idaho Power and is interested in the potential of further partnerships as Idaho Power and Micron both work toward meeting their respective clean and renewable energy goals.

II. Micron's Comments Regarding Jim Bridger Depreciation Rates

At this time, Micron does not take a specific position on Idaho Power's proposal to adjust customer rates to accelerate the depreciation schedule for all coal-related Jim Bridger Power Plant investments to allow for full depreciation and recovery by December 31, 2030. Micron reserves the right to respond to other comments as may be appropriate. However, Micron does encourage Idaho Power and the Commission to consider rate impacts of the early retirement of carbon-emitting generation resources units in the broader context of Idaho Power's resource decisions and Idaho Power's resource planning process. Specifically, Micron supports Idaho Power's planned investments in renewable resources to replace retiring carbon-emitting units. Micron also is interested in working with Idaho Power, the Commission, and other stakeholders to actively support the development of additional renewable and other environmentally sensitive resource

¹ See Micron's 2021 Sustainability Report, available at https://media-www.micron.com/-/media/client/global/documents/general/about/micron_sustainability-report-fy21-final.pdf?la=en&rev=e794e4d2f941464f84e9290d5f9864c8.

options for Idaho. To that end, in addition to submitting these comments, Micron intends to continue to participate in the Idaho Power resource planning process and may file comments in Idaho Power's currently pending 2021 IRP case at the appropriate time.² But, in the context of this proceeding, Micron urges the Commission to consider these issues in the context of Idaho Power's energy transition and investment in new renewable resources.

III. Conclusion

Micron appreciates the opportunity to provide these comments. Micron looks forward to reviewing the comments submitted by other parties and will provide responsive comments as its interests appear. Moreover, Micron will continue to engage with Idaho Power, other stakeholders, and the Commission in this proceeding, Idaho Power's 2021 IRP proceeding, and on other resource planning issues to work to examine and develop mutually beneficial resource opportunities and investments.

Respectfully submitted April 27, 2022.

HOLLAND & HART, LLP

By: 
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.

² IPC-E-21-43.

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2022, a true and correct copy of the within and foregoing COMMENTS OF MICRON TECHNOLOGY, INC. 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
lnordstrom@idahopower.com
dockets@idahopower.com

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

Commission Staff

Jan Noriyuki
Commission Secretary
Erick Shaner
Deputy Attorney General
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Building 8,
Suite 201-A
Boise, ID 83714
Jan.noriyuki@puc.idaho.gov
Erick.shaner@puc.idaho.gov

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

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

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

Idaho Conservation League

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

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

Clean Energy Opportunities for Idaho

Michael Heckler
Courtney White
3778 Plantation River Drive, Suite 102
Boise, ID 83703
mike@cleanenergyopportunities.com
courtney@cleanenergyopportunities.com

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

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
