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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)
COMPANY'S APPLICATION TO INITIATE) CASE NO. IPC-E-21-21
A MULTI-PHASE COLLABORATIVE)
PROCESS FOR THE STUDY OF COSTS,) PETITION TO INTERVENE
BENEFITS, AND COMPENSATION OF NET) OF MICRON TECHNOLOGY, INC.
EXCESS ENERGY ASSOCIATED WITH)
CUSTOMER ON-SITE GENERATION)

Micron Technology, Inc. ("Micron" or "Intervenor"), pursuant to the Commission's Rules of Procedure Rules 71 through 74,¹ 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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¹ Idaho Admin. Code 31.01.01.071- .074.

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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. In this proceeding, Idaho Power seeks to initiate a multi-phase process for a comprehensive study of the costs and benefits of on-site generation. Micron is concerned that compensation paid to customers with on-site generation could create inappropriate cost shifts to customers without on-site generation. As a large customer, Micron is particularly susceptible to the impact of potential cost shifts to customers without on-site generation and therefore supports Idaho Power’s efforts to conduct a transparent and comprehensive study of these issues. Micron was also an active participant in Case No. IPC-E-18-15 in which the Commission directed Idaho Power to conduct the study that will occur in this proceeding. Therefore, Micron has a direct and substantial interest in this proceeding because Idaho Power’s application may 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 August 16, 2021.

HOLLAND & HART, LLP

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on August 16, 2021, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-21-21 was served in the manner shown to:

Electronic Mail

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s/ Gina Gargano-Amari
