

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

---

Micron Technology, Inc. (“Micron” or “Intervenor”), pursuant to the Commission’s Notice issued October 7, 2021, submits its Final Comments regarding the proposed Study Framework Idaho Power will utilize to comprehensively evaluate the cost and benefits of on-site generation. Micron’s comments focus on the “Cost-of-Service & Rate Design” section of the proposed Study Framework. Micron encourages the Commission to approve a Study Framework that includes the important issues described in that section.

**Cost-of-Service & Rate Design**

Micron is an Idaho Power Special Contract customer and is Idaho Power’s single largest customer. Micron is supportive of Idaho Power’s net metering offerings and recognizes that, when implemented properly, net metering programs can provide benefits to customer-generators, Idaho

Power, and all Idaho Power customers. However, as a large electricity consumer, Micron is also particularly susceptible to cross-subsidies between customer-generators and customers who have not installed on-site generation and do not take advantage of net metering programs. Micron is interested in participating in this and other Idaho Power net metering proceedings to ensure that net metering programs are just and reasonable for all Idaho Power customers and that compensation paid to customer-generators does not create inappropriate cost shifts to non-customer-generators. It is not Micron's intention in this proceeding to allege or assert that such cost shifts currently exist. Rather, Micron believes that this proceeding presents an opportunity to further investigate the issue.

To that end, Micron proposed, and Commission Staff incorporated, the following section to the Study Framework under the "Cost-of-Service & Rate Design" section:

14. Evaluate how various cost of service methodologies and potential rate designs impact non-customer-generators in each rate class (including Special Contract customers) including the potential for cross-subsidies between customer-generators and non-customer-generators.

Micron believes that incorporating this language into the Study Framework is crucial to ensure that Idaho Power, the Commission, and all interested stakeholders have the necessary information to consider and propose potential changes to Idaho Power's net metering compensation rates and methodology. Indeed, Idaho Power's Application in this proceeding states:

Ultimately, the Company anticipates proposals to implement changes to the on-site generation offering will be informed by the studies and should seek to eliminate or minimize potential cross-subsidies that exist between participants and non-participants of on-site generation through rate design and compensation structures for on-site generation customers.<sup>1</sup>

---

<sup>1</sup> Application, p. 6

However, at this point Micron is unaware of data that would indicate if and to what extent subsidies currently exist in Idaho Power’s net metering programs and how to best address such subsidies if they do exist. Micron has reviewed Staff and Idaho Power’s Initial Comments filed in this proceeding and is encouraged that both parties seem to share Micron’s view that cost-of-service, rate design, and potential subsidies are important items to include in the Study Framework.<sup>2</sup>

However, Micron is concerned that some parties’ comments support excluding cost-of-service, rate design, and potential subsidy issues from the Study Framework. For example, Clean Energy Opportunities states that “any additional attempt to calculate intra or inter class subsidies caused by some customers reducing their purchases from the Company via self-generation should not be reviewed outside of a comprehensive rate case.”<sup>3</sup> Additionally, Idaho Clean Energy Association states that “in terms of minimizing subsidies across classes, this study is not the place to presume that reducing one’s usage via on-site generation creates ‘subsidies’ any different than other customers who reduce their usage.”<sup>4</sup> Finally, the Idaho Conversation League states that Idaho Power’s Application “continues the long trend of making unsubstantiated assertions about subsidization, cost shifts, and customer-generators not paying their fair share.”<sup>5</sup>

It is clear by these comments that there is considerable disagreement and a lack of information regarding whether and to what extent subsidies result from Idaho Power’s current net metering policies. This disagreement and lack of information underscores the *need* to include these issues in the Study Framework and should not serve as a basis to *exclude* them from the Study Framework. Indeed, the Commission has ordered Idaho Power to:

---

<sup>2</sup> See Commission Staff’s October 13 Comments p. 13-14; Idaho Power’s Initial Comments, p. 11.

<sup>3</sup> Initial Comments of Clean Energy Opportunities, p. 4.

<sup>4</sup> Idaho Clean Energy Association Initial Comments on Study Framework, p. 1.

<sup>5</sup> Idaho Conservation League Initial Comments on Study Framework, p. 4.

Initiate a docket to comprehensively study the costs and benefits of on-site generation on Idaho Power's system, as well as proper rates and rate design, transitional rates, and related issues of compensation for net excess energy provided as resource to the Company.<sup>6</sup>

Idaho Power has committed in this proceeding to undertake a comprehensive multi-year study process with robust input from the public and interested stakeholders, after which all parties will have access to in-depth data. This data will be invaluable in proposing and debating modifications to Idaho Power's net metering offerings. Limiting the scope of the comprehensive study would be a missed opportunity that would ultimately hinder Idaho Power's, the Commission's, and the parties' ability to make constructive changes to its net metering programs that are grounded in accurate data and are in the public interest.

It is of the utmost importance to ensure that Idaho Power's comprehensive study produces the data necessary to inform future changes to its net metering programs and to have confidence that such programs result in just and reasonable rates for all customers whether they install on-site generation or not. Therefore, Micron encourages the Commission to include cost-of-service and rate design issues in the study framework, including Micron's proposed study framework item number fourteen regarding potential subsidies.

---

<sup>6</sup> IPC-E-17-13, Order No. 34046, p. 31.

Respectfully submitted November 16, 2021.

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.

## CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2021, a true and correct copy of the within and foregoing MICRON TECHNOLOGY, INC.'s FINAL COMMENTS 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](mailto:lnordstrom@idahopower.com)  
[dockets@idahopower.com](mailto:dockets@idahopower.com)

Connie Aschenbrenner  
Idaho Power Company  
1221 W. Idaho Street (83702)  
PO Box 70  
Boise, ID 83707-0070  
[cashchenbrenner@idahopower.com](mailto:cashchenbrenner@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](mailto:Jan.noriyuki@puc.idaho.gov)  
[Erick.shaner@puc.idaho.gov](mailto:Erick.shaner@puc.idaho.gov)

#### *Idaho Clean Energy Association*

Kevin King  
P.O. Box 2264  
Boise, ID 83702  
[staff@idahocleanenergy.org](mailto:staff@idahocleanenergy.org)

#### *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](mailto:peter@richardsonadams.com)

Dr. Don Reading  
6070 Hill Road  
Boise, ID 83703  
[dreading@mindspring.com](mailto:dreading@mindspring.com)

#### *Idaho Conservation League*

Benjamin J. Otto  
Idaho Conservation League  
710 N. 6th Street  
Boise, ID 83702  
[botto@idahoconservation.org](mailto:botto@idahoconservation.org)

#### *Idaho Hydroelectric Power Producers Trust*

Tom Arkoosh  
Arkoosh Law Offices  
913 W. River Street, Suite 450  
P.O. Box 2900  
Boise, ID 83701  
[Tom.arkoosh@arkoosh.com](mailto:Tom.arkoosh@arkoosh.com)  
[Erin.cecil@arkoosh.com](mailto:Erin.cecil@arkoosh.com)

*Micron Technology, Inc.*  
Jim Swier  
Micron Technology, Inc.  
8000 South Federal Way  
Boise, ID 83707  
[jswier@micron.com](mailto: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](mailto:darueschhoff@hollandhart.com)  
[tnelson@hollandhart.com](mailto:tnelson@hollandhart.com)  
[awjensen@hollandhart.com](mailto:awjensen@hollandhart.com)  
[aclee@hollandhart.com](mailto:aclee@hollandhart.com)  
[glgarganoamari@hollandhart.com](mailto:glgarganoamari@hollandhart.com)

*Clean Energy Opportunities for Idaho*  
Michael Heckler  
Courtney White  
3778 Plantation River Drive, Suite 102  
Boise, ID 83703  
[mike@cleanenergyopportunities.com](mailto:mike@cleanenergyopportunities.com)  
[courtney@cleanenergyopportunities.com](mailto:courtney@cleanenergyopportunities.com)

Kelsey Jae  
Law for Conscious Leadership  
920 N. Clover Drive  
Boise, ID 83703  
[kelsey@kelseyjae.com](mailto:kelsey@kelseyjae.com)

*Idaho Solar Owners Network*  
Joshua Hill  
Idaho Solar Owners Network  
1625 S. Latah  
Boise, ID 83705  
[joshuashill@gmail.com](mailto:joshuashill@gmail.com)  
[tottens@amsidaho.com](mailto:tottens@amsidaho.com)

*Idaho Irrigation Pumpers Association, Inc.*  
Eric L. Olson  
Echo Hawk & Olson, PLLC  
505 Pershing Avenue, Suite 100  
P.O. Box 6119  
Pocatello, ID 83205  
[elo@echohawk.com](mailto:elo@echohawk.com)

*Boise City*  
Ed Jewell  
Deputy City Attorney  
Boise City Attorney's Office  
150 N. Capitol Blvd.  
P.O. Box 500  
Boise, ID 83701-0500  
[ejewell@cityofboise.org](mailto:ejewell@cityofboise.org)  
[boisecityattorney@cityofboise.org](mailto:boisecityattorney@cityofboise.org)

*Kiki Tidwell*  
Kiki Leslie A. Tidwell, *pro se*  
704 N. River Street #1  
Hailey, ID 83333  
[ktinsv@cox.net](mailto:ktinsv@cox.net)

*ABC Power Co. LLC*  
Ryan Bushland  
184 W. Chrisfield Drive  
Meridian, ID 83646  
[Ryan.bushland@abcpower.com](mailto:Ryan.bushland@abcpower.com)

*Comet Energy LLC*  
George Stanton  
13601 W. McMillan Road, Suite 102  
Boise, ID 83713  
[George.stanton@cometenergy.biz](mailto:George.stanton@cometenergy.biz)

Richard E. Kluckhohn  
Wesley A. Kluckhohn  
2564 W. Parkstone Drive  
Meridian, ID 83646  
[kluckhohn@gmail.com](mailto:kluckhohn@gmail.com)

*Idahome Solar, LLC*  
Tyler Grange  
2484 Stokesberry Place, #100  
Meridian, ID 83646  
[tyler@idahomesolar.com](mailto:tyler@idahomesolar.com)

*s/ Gina Gargano-Amari*

---