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IDAHO PUBLIC UTILITIES COMMISSION

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER)
COMPANY’S 2021 INTEGRATED)
RESOURCE PLAN)
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Micron Technology, Inc. (“Micron”), pursuant to the Commission’s Notice of Modified Procedure dated March 10, 2022, provides the following comments regarding Idaho Power Company’s (“Idaho Power” or the “Company”) 2021 Integrated Resource Plan (“IRP”).

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 resource planning processes. Indeed, Micron actively serves on Idaho Power’s IRP Advisory Council where Micron provides its perspective as a large customer on resource issues such as availability, reliability, cost, and sustainability.

II. Micron's Comments regarding Idaho Power's Planned Resource Procurement.

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 supports Idaho Power's continued transition to clean energy, energy efficiency and demand response programs as outlined in its IRP. Indeed, as Micron commented in Idaho Power's 2019 IRP proceeding, Micron has established its own sustainability goals, including aggressive efforts to reduce emissions and power its operations with renewable energy.¹ In the 2019 IRP proceeding Micron also commented on its interest in partnering with Idaho Power on cost-competitive renewable energy strategies that would allow both parties to meet clean energy goals.

Since the 2019 IRP, Micron and Idaho Power have successfully worked together to advance their mutual goals culminating in a revised Micron Special Contract which contemplates Idaho Power procuring a renewable resource on Micron's behalf to serve Micron's load.² Micron applauds Idaho Power's efforts to collaborate with Micron and other large customers to acquire renewable resources and encourages Idaho Power to continue these efforts as the Company transitions away from coal-fired generation. Specifically, Micron supports Idaho Power's commitment in the 2021 IRP Action Plan to "work with large-load customers to support their energy needs with solar resources."³ However, Micron cautions the Commission to ensure Idaho Power plans future resource procurement with an eye toward other large loads that may transition to customer-specific resources to ensure it does not procure excess resources.

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.

² See Case No. IPC-E-22-06.

³ 2021 IRP, p. 7.

III. Idaho Power’s Clean Energy Transition and Customer Rates.

While Micron supports Idaho Power’s clean energy transition, Micron is also sensitive to the rate impacts that can arise from early retirement of existing thermal generating units and investment in new renewable resources and energy efficiency measures. Idaho Power must ensure that its clean energy transition does not result in excessive rate impacts. Micron encourages Idaho Power to continually investigate strategies to mitigate energy transition rate impacts and implement such strategies where appropriate. For example, in Idaho Power’s pending case regarding the early retirement of the coal-fired Jim Bridger power plant and related depreciation rates, Micron and other parties requested that Idaho Power investigate securitization of the remaining plant balance to mitigate customer rate impacts.⁴ Securitization can allow utilities to pay retiring facilities’ remaining plant balances at a lower interest rate, both reducing utility risk and rate shock, resulting in a “win-win.” While securitization and other rate mitigation strategies may not be possible or appropriate in all circumstances, it is crucial that the Commission require Idaho Power to include rate mitigation efforts in its resource planning to ensure a clean energy transition that achieves sustainability goals at just and reasonable customer rates.

IV. Conclusion

Micron has long enjoyed a productive working relationship with Idaho Power and is interested in the potential for further partnerships as both work toward meeting their respective clean energy goals. Micron appreciates the opportunity to provide these comments and will continue to engage with Idaho Power, the Commission, and other stakeholders in this and other resource planning proceedings as its interests appear.

⁴ See IPC-E-21-17.

Respectfully submitted June 2, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2022 a true and correct copy of the within and foregoing MICRON TECHNOLOGY INC.'s COMMENTS was served in the manner shown to:

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