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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)	CASE NO. IPC-E-22-13
COMPANY'S APPLICATION FOR A)	
CERTIFICATE OF PUBLIC CONVENIENCE)	PETITION TO INTERVENE
AND NECESSITY TO ACQUIRE)	OF MICRON TECHNOLOGY, INC.
RESOURCES TO BE ONLINE BY 2023 TO)	
SECURE ADEQUATE AND RELIABLE)	
<u>SERVICE TO ITS CUSTOMERS.</u>)	

Micron Technology, Inc. ("Micron" or "Intervenor"), pursuant to the Commission's Rules of Procedure 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. Micron also participates in the Idaho Power Integrated Resource Plan Advisory Council. Therefore, Micron is particularly interested in and susceptible to the rate and service reliability impacts inherent in Idaho Power resource decisions, including Idaho Power’s proposed resource acquisitions in this proceeding.

3. Additionally, as discussed in Idaho Power’s Application, the Commission is currently considering Micron’s revised Special Contract with Idaho Power in Case No. IPC-E-22-06. Pursuant to the revised Special Contract, Idaho Power will supply Micron with energy from a power purchase agreement with the Black Mesa Energy, LLC (“Black Mesa”) solar generation facility to be co-located with the Black Mesa battery storage project at issue in this proceeding. Micron is interested in Idaho Power’s acquisition of the Black Mesa battery storage project as it

relates to the Black Mesa solar generation project. Micron does not oppose Idaho Power's acquisition of the Black Mesa battery storage project but rather seeks to participate in this proceeding because issues may arise that impact the Black Mesa solar generation project and Micron's revised Special Contract.

4. Therefore, Micron has a direct and substantial interest in this proceeding.

5. 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.

6. Granting Micron's Petition to Intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

7. 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 June 15, 2022.

HOLLAND & HART, LLP

By:  Austin Rueschhoff, ISB No. 10592

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CERTIFICATE OF SERVICE

I hereby certify that on June 15, 2022, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-22-13 was served in the manner shown to:

Electronic Mail

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s/ Adele C. Lee

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