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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-22-22
COMPANY'S APPLICATION TO)
COMPLETE THE STUDY REVIEW PHASE) PETITION TO INTERVENE
OF THE COMPREHENSIVE STUDY OF) OF MICRON TECHNOLOGY, INC.
COSTS AND BENEFITS OF ON-SITE)
CUSTOMER GENERATION & FOR)
AUTHORITY TO IMPLEMENT CHANGES)
TO SCHEDULES 6, 8, AND 84)
_____)
.

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:

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, Micron seeks to complete the study review phase for a comprehensive study of the costs and benefits of on-site generation. As a large customer, Micron has an interest in insuring compensation paid to customers with on-site generation is just and reasonable and does not create inappropriate cost shifts to customers without on-site generation. Micron therefore supports Idaho Power’s efforts to conduct a transparent and comprehensive study of these issues. Micron was also an active participant in Case Nos. IPC-E-18-15 and IPC-E-21-21 in which the Commission

directed Idaho Power to conduct the study that is the subject to 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.

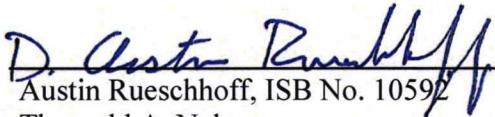
4. Granting Micron's Petition to Intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

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 2, 2022.

HOLLAND & HART, LLP

By:  _____
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CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2022, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-22-22 was served in the manner shown to:

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