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Attorneys for Micron Technology, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF IDAHO POWER COMPANY'S APPLICATION FOR A CERTIFICATE OF PUBLIC CONVENIENCE) AND NECESSITY FOR THE BOARDMAN **TO HEMMINGWAY 500-KV** TRANSMISSION LINE

) CASE NO. IPC-E-23-01 PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC.

Micron Technology, Inc. ("Micron" or "Intervenor"), pursuant to the Commission's Rules

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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 a Certificate of Public Convenience and Necessity ("CPCN") for the purpose of constructing a 300-mile long, overhead, 500 kV high voltage transmission line between the proposed Longhorn Station near Boardman, Oregon to the existing Hemmingway Substation in southwest Idaho ("B2H Project"). As a large customer, Micron has an interest in insuring Idaho Power's rates are just and reasonable and the B2H Project will have a significant impact on Idaho

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Power's future rates. Additionally, Micron is an active participant in Idaho Power's Integrated Resource Plan Advisory Council. The B2H Project has been a part of Idaho Power's integrated resource planning process for several years and will impact Idaho Power's service reliability and the types of resource used to service Micron's load. Therefore, Micron has a direct and substantial interest in this proceeding because Idaho Power's application may affect its rates for electric service and service reliability.

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 February 21, 2023.

HOLLAND & HART, LLP

By:

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Attorneys for Micron Technology, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2023, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-23-01 was served in the manner shown to:

Electronic Mail

Idaho Power Company Donovan E. Walker Idaho Power Company 1221 W. Idaho Street (83702) PO Box 70 Boise, ID 83707-0070 dwalker@idahopower.com dockets@idahopower.com

Commission Staff Jan Noriyuki Commission Secretary Idaho Public Utilities Commission 11331 W. Chinden Blvd., Building 8, Suite 201-A Boise, ID 83714 Jan.noriyuki@puc.idaho.gov secretary@puc.idaho.gov

Idaho Irrigation Pumpers Association Eric L. Olsen ECHO HAWK & OLSEN, PLLC 505 Pershing Avenue, Suite 100 P.O. Box 6119 Pocatello, ID 83205 elo@echohawk.com

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<u>s/ Kendyl Spriggs</u>

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