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Attorneys for Micron Technology, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. IPC-E-23-11
OF IDAHO POWER COMPANY FOR)	
AUTHORITY TO INCREASE ITS RATES)	PETITION TO INTERVENE
AND CHARGES FOR ELECTRIC SERVICE)	OF MICRON TECHNOLOGY, INC.
IN THE STATE OF IDAHO AND FOR)	
ASSOCIATED REGULATORY)	
ACCOUNTING TREATMENT.)	
_____)	

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, Idaho Power seeks authorization to increase its annual Idaho jurisdictional revenue by \$111,304,981. This amount is net of a corresponding proposed Power Cost Adjustment decrease of \$173.4 million and a reduction to annual Energy Efficiency Rider collection of \$3.5 million. This request would result in an overall increase of 8.61 percent, with a capital structure comprised of 51 percent equity and 49 percent debt, and a 10.40 percent rate of return on equity. As a large

customer, Idaho Power's rates for electric service impact Micron's ability to successfully transact business within Idaho. Therefore, Micron has a direct and substantial interest in ensuring Idaho Power rates are just, reasonable, and appropriately allocated among Idaho Power's customer classes.

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 June 21, 2023.

HOLLAND & HART, LLP

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2023, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-23-11 was served in the manner shown to:

Electronic Mail

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s/ Chelsey Moser _____

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