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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-23-14
COMPANY’S APPLICATION FOR)
AUTHORITY TO IMPLEMENT CHANGES) PETITION TO INTERVENE
TO THE COMPENSATION STRUCTURE) OF MICRON TECHNOLOGY, INC.
APPLICABLE TO CUSTOMER ON-SITE)
GENERATION UNDER SCHEDULES 6, 8,)
AND 84 AND TO ESTABLISH AN EXPORT)
CREDIT METHODOLOGY)

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 change the structure and design of its on-site generation tariffs. As a large customer, Micron has an interest in ensuring 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 was also a participant in Case Nos. IPC-E-18-15, IPC-E-21-21, and IPC-E-22-22 in which the Commission previously considered changes

to Idaho Power's on-site generation tariffs and ordered Idaho Power to further study the relevant issues before proposing changes to the tariffs, resulting in this case. 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 June 6, 2023.

HOLLAND & HART, LLP

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on June 6, 2023, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-23-14 was served in the manner shown to:

Electronic Mail

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s/ Adele Lee _____

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