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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF IDAHO POWER ) CASE NO. IPC-E-23-23  
COMPANY’S 2023 INTEGRATED )  
RESOURCE PLAN ) COMMENTS  
) OF MICRON TECHNOLOGY, INC.

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Micron Technology, Inc. (“Micron”), pursuant to the Commission’s Notice of Modified Procedure dated December 15, 2023, provides the following comments regarding Idaho Power Company’s (“Idaho Power” or the “Company”) 2023 Integrated Resource Plan (“IRP”).

**I. Introduction**

Micron is Idaho Power’s largest customer and is in the process of significantly expanding its Idaho investment, operations, and electric load.<sup>1</sup> Therefore, Micron relies on Idaho Power’s provision of reliable electric service at just and reasonable rates in order to effectively operate its business and remain competitive in the global marketplace. Micron is an Idaho Power Special Contract customer and recently amended its Special Contract to incorporate Micron’s investment

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<sup>1</sup>See Micron Press Release “Micron Breaks Ground on Leading-Edge Manufacturing Fab in Boise, Idaho” (September 12, 2022). Available at <https://investors.micron.com/news-releases/news-release-details/micron-breaks-ground-leading-edge-manufacturing-fab-boise-idaho>.

in the Black Mesa Solar project through Idaho Power's Clean Energy Your Way program. Micron is keenly interested in all aspects of Idaho Power's cost of service and service reliability, including Idaho Power's resource planning processes. Indeed, Micron actively serves on Idaho Power's IRP Advisory Council where Micron provides its perspective as a large customer on resource issues such as availability, reliability, cost, and sustainability. Micron submits these comments to assist the Commission consider Idaho Power's IRP from the prospective of an Idaho Power large customer.

## **II. Micron's Sustainability and Clean Energy Goals**

Micron applauds Idaho Power's efforts presented in the IRP to meet its 100% clean energy by 2045 goal. Idaho Power's IRP is marked by significant investment in new renewable resources, energy efficiency, generating facility conversions from coal to natural gas, and new transmission investment to facilitate efficient use of renewable generation resources. While reliable service at reasonable rates is a critical component of Idaho Power's electric service, Micron is also interested in the types of resources used to serve its electric load. Sustainability and environmental efforts are cornerstones of Micron's business operations and Micron is working toward its own ambitious greenhouse gas emission and renewable energy goals.<sup>2</sup>

In past Idaho Power IRP proceedings Micron has commented on its interest in partnering with Idaho Power on cost-competitive renewable energy strategies that would assist both parties to meet clean energy goals. In 2023, Micron and Idaho Power finalized its amended Special Contract incorporating the Black Mesa solar project procured by Idaho Power on Micron's behalf

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<sup>2</sup> See Micron's 2023 Sustainability Report, available at [https://media-www.micron.com/-/media/client/global/documents/general/about/2023/2023\\_micron\\_sustainability\\_report.pdf?la=en&rev=365ecf23d3324430a3eb117e9fb3ffa1](https://media-www.micron.com/-/media/client/global/documents/general/about/2023/2023_micron_sustainability_report.pdf?la=en&rev=365ecf23d3324430a3eb117e9fb3ffa1).

as part of the Idaho Power Clean Energy Your Way program. The Black Mesa project entered commercial operation in June 2023 and currently serves portions of Micron's load. The amended Special Contract also provides flexibility for Idaho Power and Micron to work together to potentially develop additional renewable resources in the future to serve Micron's growing load. Additionally, in 2023 Micron worked collaboratively with the City of Boise to transfer some of the Black Mesa renewable generation to the City to help meet its sustainability goals. The details of that arrangement are being finalized and will be presented for Commission approval when appropriate.

Micron is proud to have worked with Idaho Power and the City of Boise on these mutually beneficial renewable energy arrangements. Idaho Power's IRP demonstrates it will need to add substantial resources to its generation portfolio in the coming years. Micron encourages Idaho Power to continue working with Micron and other large customers to develop large-scale customer-dedicated generation resources that meet Idaho Power's and large customers' mutual sustainability goals.

### **III. Idaho Power's Resource Needs and Customer Rates**

While Micron supports Idaho Power's clean energy transition and investment in renewable generation to meet growing loads, Micron is also sensitive to the rate impacts that can arise from investment in new resources and conversion or early retirement of existing thermal generating units. Idaho Power's IRP calls for significant capital investment in both generation and transmission resources. Idaho Power must ensure that its clean energy transition does not result in excessive rate impacts that harm businesses working to remain cost-competitive in the national and global marketplace. Micron encourages Idaho Power to continually investigate strategies to mitigate energy transition rate impacts and implement such strategies where appropriate. For

example, Micron encourages Idaho Power to continue to conduct robust competitive solicitation processes when acquiring new resources to ensure new investments are least-cost and least-risk and to consider rate mitigation strategies such as securitization if Idaho Power retires thermal generation plants early.

#### **IV. Western Energy Markets and Regional Coordination**

Idaho Power currently participates in the Western Energy Imbalance Market (“EIM”) and the Western Power Pool (“WPP”) Western Resource Adequacy Program (“WRAP”). The EIM allows participants to buy and sell power close to the time electricity is consumed and gives electric system operators real-time visibility across neighboring grids, resulting in improved balancing of electric supply and demand across the region, often resulting in lower costs. WRAP is a regional planning and capacity program that allows utility participants to share available resources if a participant experiences a short-term period of resource deficiency, thereby potentially reducing a participants’ own capacity needs. Indeed, the IRP shows Idaho Power including 14 MW of capacity associated with WRAP in its resource portfolio beginning in 2027. A recent WPP assessment demonstrated the value of WRAP to support participant service reliability during the January 2024 Northwest cold weather event, reinforcing the importance of Idaho Power’s participation in the WRAP to provide customers with reliable power.<sup>3</sup>

In the IRP, Idaho Power acknowledges the importance of markets and identifies market access as a “major qualitative risk” in its modeling analysis, stating that:

[w]ith many utilities including Idaho Power relying more on resources like wind and solar, the ability to access markets like the EIM becomes increasingly important. Lack of market access can cause considerable wholesale price

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<sup>3</sup> See [https://www.westernpowerpool.org/private-media/documents/WPP\\_Assessment\\_of\\_January\\_2024\\_Cold\\_Weather\\_Event\\_Final.pdf](https://www.westernpowerpool.org/private-media/documents/WPP_Assessment_of_January_2024_Cold_Weather_Event_Final.pdf).

fluctuations and high costs as well as present reliability concerns during times of need.”<sup>4</sup>

Micron supports Idaho Power’ participation in the EIM to capture market efficiencies and deliver electricity to Idaho Power customers at lower costs. Micron is also aware that many western utilities, utility regulators, and other interested stakeholders are investigating new or expanded regional markets in the west, including the California ISO Extended Day Ahead Market (“EDAM”),<sup>5</sup> the Southwest Power Pool Markets+,<sup>6</sup> and the West-Wide Governance Pathways Initiative.<sup>7</sup> Micron understands that the western market landscape is evolving and that participation in regional markets requires careful analysis of the potential pros and cons. However, Micron encourages Idaho Power to continually investigate and analyze regional markets and coordination efforts and seek opportunities to participate in such programs that will result in increased reliability and lower costs to customers.

## **V. Conclusion**

Micron has long enjoyed a productive working relationship with Idaho Power and is interested in the potential for further partnerships as both work toward meeting their respective clean energy goals. Micron appreciates the opportunity to provide these comments and will continue to engage with Idaho Power, the Commission, and other stakeholders in this and other resource planning proceedings as its interests appear.

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<sup>4</sup> IRP, p. 141.

<sup>5</sup> See EDAM Fact Sheet available at <https://www.caiso.com/Documents/extended-day-ahead-market-edam-fact-sheet.pdf>.

<sup>6</sup> See <https://www.spp.org/western-services/marketsplus/>.

<sup>7</sup> See <https://www.westernenergyboard.org/wwgpi/>.

Respectfully submitted February 15, 2024.

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## CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2024, a true and correct copy of the within and foregoing COMMENTS OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-23-23 was served in the manner shown to:

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*s/ Adele Lee* \_\_\_\_\_