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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-24-16
COMPANY'S APPLICATION FOR A)
CERTIFICATE OF PUBLIC CONVENIENCE) PETITION TO INTERVENE
AND NECESSITY FOR THE BOISE BENCH) OF MICRON TECHNOLOGY, INC.
BATTERY STORAGE FACILITY)

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:

Micron Technology, Inc.
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¹ Idaho Admin. Code 31.01.01.071-.074.

Copies of all pleadings, production requests, production responses, Commission orders, and other documents should be provided to:

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Micron Technology, Inc.
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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. Micron also participates in the Idaho Power Integrated Resource Plan Advisory Council (“IRPAC”). In this proceeding, Idaho Power seeks a Certificate of Public Convenience and Necessity (“CPCN”) to acquire the Idaho Power-owned Boise Bench battery storage facility, providing 150 MW of new dispatchable energy storage and operating capacity. Idaho Power asserts that the battery storage project is necessary to continue to provide reliable and adequate electric service to Idaho Power Customers starting in the summer of 2026 and into the future.

3. As a large customer, Micron has an interest in ensuring Idaho Power’s electric service is reliable and rates are just and reasonable. Additionally, as a member of IRPAC, Micron has an interest in Idaho Power’s resource planning and selection and the types of electric resources that are used to serve Micron. The Boise Bench battery storage facility may have a significant impact on Idaho Power’s future rates for electric service and service reliability. Therefore, Micron has a direct and substantial interest in this proceeding.

4. 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.

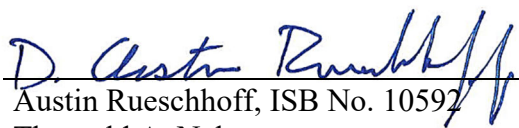
5. Granting Micron's Petition to Intervene will not unduly broaden the issues, nor will it prejudice any party to this case.

6. Without the opportunity to intervene, Micron would be without adequate means to participate 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 May 14, 2024.

HOLLAND & HART, LLP

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2024, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-24-16 was served in the manner shown to:

Electronic Mail

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s/ Adele Lee _____

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