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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-24-18
COMPANY'S APPLICATION FOR)
APPROVAL OF A CLEAN ENERGY YOUR) PETITION TO INTERVENE
WAY CONSTRUCTION AGREEMENT) OF MICRON TECHNOLOGY, INC.
WITH THE CITY OF BOISE AND THE)
FIRST AMENDMENT THERETO)

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.

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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”) and is Idaho Power’s single largest customer. Micron is also an Idaho Power Special Contract customer. Micron’s revised Special Contract was approved by this Commission in Case No. IPC-E-22-06 along with Idaho Power’s Power Purchase Agreement with Black Mesa Energy, LLC (“Black Mesa”), entered into in part to serve Micron under the Clean Energy Your Way (“CEYW”) program. As discussed in Idaho Power’s Application in this proceeding, Micron’s Special Contract contains a provision that allows for another Idaho Power customer to purchase a share of Black Mesa electric generation.² In this proceeding, Idaho Power seeks Commission approval to effectuate that provision in Micron’s Special Contract to enter into a new Renewable Construction Agreement between the City of Boise and Idaho Power utilizing a portion of Black Mesa electric generation.

² Application, p. 3.

3. This proceeding will impact Micron's Special Contract and the portion of Micron's electric load that is served from Black Mesa's output. 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 24, 2024.

HOLLAND & HART, LLP

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2024, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. IPC-E-24-18 was served in the manner shown to:

Electronic Mail

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s/ Adele Lee _____

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