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IDAHO PUBLIC UTILITIES COMMISSION

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Attorneys for Micron Technology, Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF SUEZ WATER IDAHO) CASE NO. SUZ-W-20-02
INC.'S APPLICATION FOR AUTHORITY)
TO INCREASE ITS RATES AND CHARGES) PETITION TO INTERVENE OUT
FOR WATER SERVICE IN IDAHO) OF TIME OF MICRON
) TECHNOLOGY, INC.
)
_____)

Micron Technology, Inc. ("Micron" or "Intervenor"), pursuant to the Commission's Rules of Procedure, Rule 71 IDAPA 31.01.01.71, hereby petitions the Commission for leave to intervene and to appear and participate in these proceedings as a party, and as grounds therefore states:

1. The name and address of this Intervenor is:

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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 has a direct and substantial interest in this matter. Suez Water Idaho, Inc. (“Suez”) has requested an average 22.3% rate increase to its water service customers. As a large Suez consumer, Micron’s water expenses will increase substantially if Suez’s rates are implemented without change.

3. Although this Petition to Intervene is being filed past the Commission’s notice of intervention deadline,¹ Commission’s Rules of Procedure Rule 73 permits untimely petitions to intervene if the petition states a substantial reason for delay. The Commission may grant untimely petitions to intervene when such petitions do not present disruption, prejudice existing parties, or unduly burden the issues. The Commission has customarily held a “liberal intervention policy,” which is “coupled with the strict determination that intervenors may not unduly broaden the issues of the case.”²

4. In this instance, Micron did not become fully aware of the filing until we were contacted by a representative of the City of Boise on November 6, 2020. Thereafter, Micron required some additional time to fully ascertain the impact of Suez’s Application on Micron’s operations and determine whether intervention was warranted. Without the opportunity to

¹ Notice of Application, p. 3 (issued Oct. 21, 2020).

² Order No. 25460, p. 5 (Apr. 1994).

intervene herein, Micron would be without any means of participating in this proceeding which may have a material impact on Micron. Finally, the proceeding has not materially progressed beyond the issuance of the Commission's October 21 Notice of Application. Therefore, the granting of this Petition to Intervene would not present disruption, prejudice existing parties, or unduly burden the issues.

5. 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 which Micron will introduce is dependent upon the nature and effect of other evidence in this proceeding.

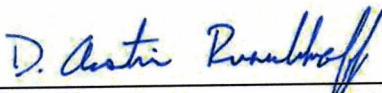
6. Granting Micron's Petition to Intervene Out of Time will not unduly broaden the issues, nor will it prejudice any party to this case; rather, granting the petition will serve the public's interest.

7. Without the opportunity to intervene herein, Micron would be without adequate means of participation in this proceeding that may have a material impact on its water rates and terms and conditions of service.

WHEREFORE, Micron Technology, Inc. respectfully requests that the Commission grant its Petition to Intervene Out of Time 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 November 18, 2020.

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By: 
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CERTIFICATE OF SERVICE

I hereby certify that on November 18, 2020, a true and correct copy of the within and foregoing PETITION TO INTERVENE OUT OF TIME OF MICRON TECHNOLOGY, INC. IN CASE NO. SUZ-W-20-02 was served in the manner shown to:

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s/ Gina Gargano-Amari _____