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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 THE APPLICATION)	CASE NO. VEO-W-22-02
OF VEOLIA WATER IDAHO INC. FOR)	
AUTHORITY TO INCREASE ITS RATES)	PETITION TO INTERVENE OF
AND CHARGES FOR WATER SERVICE IN)	MICRON TECHNOLOGY, INC.
THE STATE OF IDAHO)	
)	

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:

Micron Technology, Inc.
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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. Veolia Water Idaho, Inc. (“Veolia”) has requested an average 23.4% rate increase to its water service customers. As a large Veolia consumer, Micron’s water expenses will increase substantially if Veolia’s rates are implemented without change. Additionally, Micron was an active participant in Veolia’s (then Suez Water Idaho, Inc.) last rate case and a signatory to the Stipulation and Settlement entered in that case.¹ That Stipulation and Settlement required Veolia to undertake a load study and present the results of such load study in this general rate case. Micron has a direct and substantial interest in the results of that load study presented in this matter.

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

¹ Case No. SUZ-W-20-02.

4. Granting Micron's Petition to Intervene 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.

5. 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 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 9, 2022.

HOLLAND & HART, LLP

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2022, a true and correct copy of the within and foregoing PETITION TO INTERVENE OF MICRON TECHNOLOGY, INC. IN CASE NO. VEO-W-20-02 was served in the manner shown to:

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