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February 20, 2008

Via Hand Delivery

Jean Jewell
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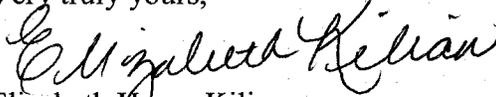
Re: In the Matter of the Appropriate Disposition of Proceeds for the Sale of
Idaho Power Company's SO2 Emission Allowances in CY 2007 – Case
No.: IPC-E-07-18
Our File: 4489-30

Dear Jean:

Enclosed for filing please find an original and seven (7) copies of Micron Technology's
Comments to Notice of Modified Procedure in connection with the above-captioned matter.

If you have any questions, please contact Conley Ward at (208) 388-1219.

Very truly yours,


Elizabeth Hauer-Kilian
Administrative/Legal Assistant

/ehk
Enclosures: Orig. + Seven (7) Copies
cc: Service List (w/enclosures)
EHK to Jean Jewell re filing orig Micron Comments to Modified Procedure

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPROPRIATE
DISPOSITION OF PROCEEDS FOR THE
SALE OF IDAHO POWER COMPANY'S
SO2 EMISSION ALLOWANCES IN CY 2007

Case No. IPC-E-07-18

MICRON TECHNOLOGY, INC.'S
COMMENTS TO NOTICE OF
MODIFIED PROCEDURE

Micron Technology, Inc. ("Micron"), by and through its attorney of record, Conley E. Ward, Givens Pursley LLP, respectfully submits the following comments in response to Order No. 30495, dated February 4, 2008. For the reasons summarized below, Micron supports the Commission Staff's recommendation that the proceeds from the sale of Idaho Power Company's SO2 emission allowances should be used to offset the rate increase that will occur as a result of the 2008 Power Cost Adjustment ("PCA").

1. Idaho Power's first proposed alternative for the use of the SO2 proceeds—the purchase of green tags in anticipation of future legal requirements—is inherently speculative because current law does not require the purchase of green tags. Furthermore, even if green tag purchases are ultimately required, there is no guarantee that prices will be higher than current levels, as Idaho Power argues. In fact, basic economic principles would suggest that existing green tag prices already discount efficiently and accurately the likelihood of the imposition of

green tag requirements and probable prices. If Idaho Power wishes to wager that it can outguess the collective wisdom of the existing green tag market, it should do so with shareholder, rather than ratepayer, funds.

2. Idaho Power's second alternative use for the SO₂ sale proceeds—the purchase of an existing wind power development—also contains speculative elements. As Micron understands Idaho Power's proposal, the Company would purchase the development rights to one or more as yet unbuilt wind power sites. In essence, the ratepayers would be asked to take on all the risks that accompany any type of property development. In a worst case scenario, the purchased site could turn out to be a “dry hole” that is never built because of economic or legal constraints. For its part, Micron does not wish to be forced into the wind development business, and it respectfully suggests many other Idaho Power ratepayers would agree.

3. Finally, all of the alternative proposed uses for the SO₂ sale proceeds, including the suggested diversion of funds for conservation education, suffer from a common defect. One of the reasons why large publicly traded utilities like Idaho Power exist is that their size and monopoly status gives them access to investment capital on terms that most individual ratepayers cannot begin to match. For example, the marginal cost of capital for many residential ratepayers is effectively their interest charges on credit cards or consumer loans, often 15% or more per year. Idaho Power, on the other hand, in its most recent rate case filing claimed an overall cost of capital of approximately 8.5%, with a cost of debt financing roughly 150 basis points less than this figure. Consequently, forcing ratepayers to become involuntary utility investors, however laudable the proposed use of the funds may be, is a terribly inefficient and unfair waste of capital resources, and it is contrary to the basic regulatory premise that utility investors voluntarily

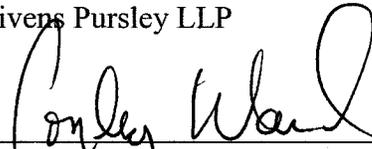
supply the needed capital to provide service, and the ratepayers in turn pay a fair return on that capital.

CONCLUSION

For the reasons stated above, Micron urges the Commission to use the proceeds from the sale of SO2 emission allowances to offset the rate increase from the 2008 Power Cost Adjustment case.

Respectfully submitted this 20th day of February, 2008.

Givens Pursley LLP



Conley E. Ward, Givens Pursley LLP
Attorneys for Micron Technology, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of February, 2008, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

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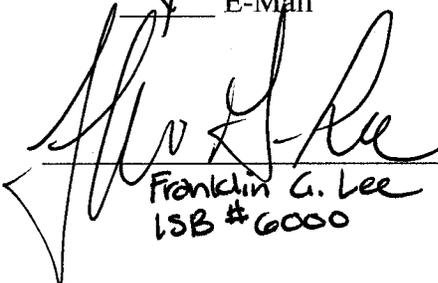
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