

November 20, 2000

Via Electronic Filing and Federal Express

David Boergers
Secretary
Office of the Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: RTO West Compliance Filing
Docket No. RT01-35-000

Dear Commission Secretary:

On or about October 19, 2000, certain "Filing Utilities" submitted a "Supplemental Compliance Filing and Request for Declaratory Order Pursuant to Order 2000" ("Supplemental Filing") in Docket No. RT01-35-000. The purpose of this letter is to provide comments on the Supplemental Filing as the Federal Energy Regulatory Commission ("FERC") considers this matter.

Micron Technology, Inc. ("Micron"), is a manufacturer of dynamic random access memory devices and other similar semiconductor memory components with domestic manufacturing facilities in Idaho and Utah as well as overseas manufacturing facilities in Italy, Singapore, and Japan. Micron maintains numerous related operations throughout the United States and internationally. In an extremely competitive global industry, Micron is the last remaining U.S. manufacturer of DRAM. We have been able to thrive against intense foreign competition by becoming the low-cost producer of DRAM memory products in the world.

Micron's electrical energy requirements are substantial. More importantly, the quality and reliability of power available to Micron has a critical impact on Micron's manufacturing process. A stable and reliable supply of electric power is essential in Micron's ability to remain competitive. Micron is part of a growing high tech industry that is heavily dependent upon reliable power. Because of the nature of our manufacturing process, Micron and many other high tech companies may be more dependent upon stable electric power than other traditional industries. The lack of stable power can have a catastrophic impact on our business. In 1996 when the Pacific Northwest experienced a major power outage, Micron lost \$7 million in product and equipment in a single day alone. Smaller fluctuations in our power supply can also destroy product and damage sensitive equipment. Micron loses valuable product and equipment each year as a result of power quality issues. For these reasons, Micron is very sensitive about developments in the electric power industry that may affect the reliability of available power.

Governance and Bylaws

Micron has three primary concerns regarding the proposed governance structure in the Supplemental Filing. First, Micron believes that the independent Board of Trustees should include stakeholders rather than limiting stakeholders to the Advisory Committee. Excluding stakeholders from the Board of Trustees will reduce the probability that the Board will have the technical expertise necessary to operate effectively. Second, the Advisory Committee's role is inappropriately narrow. The Advisory Committee's role should be stronger than provided by the Supplemental Filing, especially if there is a possibility that the only industry experience in management would be found on the Committee. Third, Micron believes that the Board of Trustees should specifically include representation of major industrial customers. The interests of all those who would be included within the other categories represented on the Board are diverse and often in conflict. Individual Board members cannot be expected to represent effectively such broad and diverse categories.

Construction Planning

Micron has concerns regarding future construction of additional transmission resources. The potential problem arises when the Filing Utilities are unwilling to invest capital in additional transmission capability. A decision not to build could be based on financial or nonfinancial reasons (e.g. avoid the permitting issues or environmental opposition). Failure by the Filing Utilities to build could be followed by indecision and delay on the part of RTO West in making a commitment to build. Micron and other companies that depend upon reliable sources of electricity would suffer substantial harm as a result of brownouts or blackouts. Micron is concerned that there may not be sufficient incentives for construction of new transmission facilities.

Reliability

Micron has supported electric reliability solutions offered by the North American Electric Reliability Council and federal legislation sponsored by U.S. Senator Gorton. Micron strongly encourages the Commission to require incorporation of sensible reliability provisions as part of RTO West. In addition, Micron is concerned that reliability and quality standards not be disregarded in an attempt to add power or transmission to the system. We believe that the immediate need to establish an RTO should not proceed at the expense of power quality and reliability.

Interregional Cooperation

Micron supports the efforts of RTO West participants to resolve interregional coordination ("seams") issues within the Western Interconnection. Micron urges FERC to review each of the three Western RTO filings (RTO West, the California ISO and Desert STAR) with an eye to encouraging ongoing Western efforts to eliminate seam problems relating to pricing and reliability.

Micron thanks the Commission for this opportunity to briefly state its concerns and proposals

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and we are available to answer any questions the Commission Staff may have.

Respectfully submitted this 20th day of November, 2000.

Steven Stout
Vice President of Facilities