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ATTORNEYS FOR NUCOR STEEL, A DIVISION OF NUCOR CORPORATION

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

	)	Docket No. 06-035-21
	)	
In the Matter of the Application of	)	MOTION TO INTERVENE
PacifiCorp for Approval of its Proposed	)	OF NUCOR STEEL, A DIVISION
Electric Service Schedules and Electric	)	OF NUCOR CORPORATION
Service Regulations	)	

Pursuant to Utah Code Ann. § 63-46b-9 (1992) and Utah Admin. Code § R746-100-7, Nucor Steel, a Division of Nucor Corporation ("Nucor") hereby moves for leave to intervene in the above-referenced proceeding before the Public Service Commission of Utah. In support of this Motion, Nucor states as follows:

1. PacifiCorp (doing business as Utah Power) filed an application with the Commission for approval of its proposed electric service schedules and electric service regulations on March 7, 2006.

2. Nucor owns and operates a steel mill in Plymouth, Utah, which is served by PacifiCorp under a special contract approved by this Commission. Nucor is one of PacifiCorp's

largest customers, purchasing tens of millions of kilowatt-hours of electricity per month at a cost of millions of dollars per year. Nucor's full name and primary place of business is:

Nucor Steel A Division of Nucor Corporation P.O. Box 100 Plymouth, Utah 84330

2. As a major retail customer of PacifiCorp, Nucor has a direct interest in these proceedings and the outcome may have a substantial effect on Nucor. Because of the early stage of this proceeding, Nucor has not yet determined what, if any, positions it will take on any issues raised, nor what relief it may seek to protect its interests.

3. Nucor's interest in the outcome of these proceedings will not adequately be represented by any other party, nor will Nucor's participation impair the conduct of the proceeding. Nucor's participation will promote the interests of justice.

4. The following persons should be included on the service list in these proceedings, and all communications concerning this matter should be addressed to:

Peter J. Mattheis Eric J. Lacey BRICKFIELD, BURCHETTE, RITTS & STONE, P.C. 1025 Thomas Jefferson Street, N.W. 800 West Tower Washington, D.C. 20007

Gerald H. Kinghorn Jeremy R. Cook PARSONS KINGHORN HARRIS, P.C. 111 East Broadway, 11<sup>th</sup> Floor Salt Lake City, UT 84111 WHEREFORE, for the reasons set forth above, Nucor requests that the Public Service Commission of Utah grant this timely Motion to Intervene and permit Nucor to participate in this proceeding with full rights as a party.

DATED this 20<sup>th</sup> day of March 2006.

Respectfully submitted,

/s/ \_\_\_\_\_

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Attorneys for Nucor Steel

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Request to Intervene in Docket was sent by United States mail, postage prepaid, or mailed electronically on the 20<sup>th</sup> day of March 2006, to the following:

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/s/\_\_\_

Jeremy R. Cook