

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
Telephone: (202) 342-0800
Facsimile: (202) 342-0807

Gerald H. Kinghorn
Jeremy R. Cook
PARSONS KINGHORN HARRIS, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
Telephone: (801) 363-4300
Facsimile: (801) 363-4378

ATTORNEYS FOR NUCOR STEEL-PLYMOUTH, A DIVISION OF NUCOR CORPORATION

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations

Docket No. 08-035-38

**PETITION TO INTERVENE
OF NUCOR STEEL-PLYMOUTH, A
DIVISION OF NUCOR CORPORATION**

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7, Nucor Steel-Plymouth, 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 Rocky Mountain Power) filed an application with the Commission for approval of its proposed electric service schedules and electric service regulations on July 17, 2008.

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

3. 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.

4. 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.

5. 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
pjm@bbrslaw.com
elacey@bbrslaw.com

Gerald H. Kinghorn
Jeremy R. Cook
PARSONS KINGHORN HARRIS, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
ghk@pkhlawyers.com
jrc@pkhlawyers.com

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 4th day of August, 2008.

Respectfully submitted,

Gerald H. Kinghorn
Jeremy R. Cook
PARSONS KINGHORN HARRIS, P.C.
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
(801) 363-4300
(801) 363-4378 – Facsimile

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
(202) 342-0800
(202) 342-0807 – Facsimile
Attorneys for Nucor Steel-Plymouth

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by email this 4th day of August, 2008, to the following:

Mark C. Moench
Yvonne R. Hogle
Daniel E. Solander
Rocky Mountain Power
201 South Main Street, Suite 2300
Salt Lake City, Utah 84111
Telephone No. (801) 220-4459
Facsimile No. (801) 220-4058
mark.moench@pacificorp.com
yvonne.hogle@pacificorp.com
daniel.solander@pacificorp.com

Katherine A. McDowell
Lisa F. Rackner
Admitted Pro Hac Vice
McDowell & Rackner, P.C.
520 SW 6th Avenue, Suite 830
Portland, OR 97204
Telephone No. (503) 595-3924
Facsimile No. (503) 595-3928
Katherine@mcd-law.com
lisa@mcd-law.com

F. Robert Reeder
William J. Evans
Vicki M. Baldwin
Parsons Behle &, Latimer
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
bobreeder@parsonsbehle.com
bevans@parsonsbehle.com
vbaldwin@parsonsbehle.com

Cheryl Murray
Dan Gimble
Michele Beck
Committee of Consumer Services
160 East 300 South, 2nd Floor
Salt Lake City, UT 84111
cmurray@utah.gov
dgimble@utah.gov
mbeck@utah.gov

Paul Proctor
Utah Committee of Consumer Services
Heber M. Wells Bldg., Fifth Floor
160 East 300 South
Salt Lake City, UT 84111
pproctor@utah.gov

Gary A. Dodge
Hatch James & Dodge
10 West Broadway, Suite 400
Salt Lake City, UT 84101
gdodge@hjdllaw.com

Dennis Miller
William Powell
Philip Powlick
Division of Public Utilities
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, UT 84111
dennismiller@utah.gov
wpowell@utah.gov
philippowlick@utah.gov

Michael Ginsberg
Patricia Schmid
Assistant Attorney General
Utah Division of Public Utilities
Heber M. Wells Bldg., Fifth Floor
160 East 300 South
Salt Lake City, UT 84111
mginsberg@utah.gov
pschmid@utah.gov

Rick Anderson
Kevin Higgins
Neal Townsend
Energy Strategies, Inc.
215 South State Street, Suite 200
Salt Lake City, UT 84111
randerson@energystrat.com
khiggins@energystrat.com
ntownsend@energystrat.com

Arthur F. Sandack
Attorney for Petitioner IBEW Local 57
8 East Broadway, Ste 510
Salt Lake City, Utah 84111
Telephone: (801) 532-7858
asandack@msn.com

Roger Swenson
US Magnesium LLC
238 North 2200 West
Salt Lake City, Utah 84116
Roger.swenson@prodigy.net

Betsy Wolf
Utah Ratepayers Alliance
Salt Lake Community Action Program
764 South 200 West
Salt Lake City, Utah 84101
bwolf@slcap.org

Stephen R. Randle
Stephen R. Randle P.C.
Attorney for Utah Farm Bureau Federation
664 N Liston Cir.
Kaysville, UT 84037
s.randle@yahoo.com

Mike Mendelsohn
Penny Anderson
Western Resource Advocates
2260 Baseline Rd, Suite 200
Boulder, CO 80302
mmendelsohn@westernresources.org
penny@westernresources.org

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
Ph: 513-421-2255 Fax: 513-421-2764
mkurtz@bkllawfirm.com
kboehm@bkllawfirm.com

Roger J Ball
1375 Vintry Lane
Salt Lake City, Utah 84121
(801) 277-1375
ball.roger@gmail.com

Stephen F. Mecham
Callister Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, UT 84133
sfmecham@cnmlaw.com

Craig Cox
Executive Director
Interwest Energy Alliance
P.O. Box 272
Conifer, Colorado 80433
cox@interwest.org

Steven S. Michel
Western Resource Advocates
2025 Senda de Andres
Santa Fe, NM 87501
smichel@westernresources.org

Sarah Wright
Executive Director
Utah Clean Energy
1014 2nd Avenue
Salt Lake City, UT 84103
sarah@utahcleanenergy.org

Ronald J. Day, CPA
Central Valley Water Reclamation Facility
800 West Central Valley Road
Salt Lake City, UT 84119
dayr@cvwrf.org

Holly Rachel Smith, Esq.
Russell W. Ray, PLLC
6212-A Old Franconia Road
Alexandria, VA 22310
holly@raysmithlaw.com

Mr. Ryan L. Kelly
Kelly & Bramwell, PC
Attorneys at Law
11576 South State Street Bldg. 203
Draper, UT 84020
ryan@kellybramwell.com

Todd R. Bingham
Randy Parker
Utah Farm Bureau Federation
V.P. Public Policy
9865 South State Street
Sandy, Utah 84070-3205
Todd.Bingham@fbfs.com
rparker@fbfs.com

Gregory B. Monson
Stoel Rives LLP
201 South Main Street, Suite 1100
Salt Lake City, UT 84111
(801) 578-6946
(801) 578-6999 (fax)
gbmonson@stoel.com

Dale F. Gardiner
Van Cott, Bagley, Cornwall & McCarthy
36 South State Street, Suite 1900
Salt Lake City, Utah 84111
E-mail: dgardiner@vancott.com

Janee Briesemeister
AARP
98 San Jacinto Blvd. Ste. 750
Austin, TX 78701
E-mail: jbriesemeister@aarp.org

Steve W. Chriss
Wal-Mart Stores, Inc.
2001 SE 10th Street
Bentonville, AR 72716-0550
stephen.chriss@wal-mart.com

Barrie L. McKay
Colleen Larkin Bell
Jenniffer Byde
Questar Gas Company
180 East 100 South
P.O. Box 45360
Salt Lake City, UT 84145-3604
barrie.mckay@questar.com
colleen.bell@questar.com
jenniffer.byde@questar.com
Roger J. Ball
Utah Ratepayers Association
1375 Vintry Lane
Salt Lake City, UT 84121
ura@utahratepayers.org