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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 Approval of its Proposed Energy Cost Adjustment Mechanism

Docket No. 09-035-15

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

Pursuant to Utah Code Ann. § 63-46b-9 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 Energy Cost Adjustment Mechanism on March 16, 2009.

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

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:

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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 8th Day of June, 2009.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **PETITION TO INTERVENE OF NUCOR STEEL-PLYMOUTH, A DIVISION OF NUCOR CORPORATION** was served by email this 8th Day of June, 2009, to the following:

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