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ATTORNEYS FOR NUCOR STEEL-UTAH, 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 the Electric Service Agreement between PacifiCorp and Nucor Corporation	Docket No. 15-035-81 PETITION TO INTERVENE OF NUCOR STEEL-UTAH, A DIVISION OF NUCOR CORPORATION
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Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-100-7, Nucor Steel-Utah, a Division of Nucor Corporation (“Nucor”) hereby petitions for leave to intervene in the above-referenced proceeding before the Public Service Commission of Utah (“Commission”). In support of this Motion, Nucor states as follows:

1. Rocky Mountain Power, a division of PacifiCorp, filed an application for approval of an Electric Service Agreement between PacifiCorp and Nucor on November 5, 2015.

2. Nucor owns and operates a steel mill in Plymouth, Utah, which is served by Rocky Mountain Power under a special contract approved by this Commission. Nucor is one of Rocky Mountain Power’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-Utah
A Division of Nucor Corporation
P.O. Box 100
Plymouth, Utah 84330

2. The current ESA between Nucor and PacifiCorp is set to expire on December 31, 2015. PacifiCorp and Nucor have agreed to an updated ESA, a copy of which was submitted with Rocky Mountain Power's Application on November 5, 2015. The updated ESA would begin January 1, 2016 and expire on December 31, 2017.

3. Nucor's interest will be substantially affected by the outcome of these proceedings and Nucor 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 9th day of December, 2015.

Respectfully submitted,

/s/ Jeremy R. Cook _____

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Attorneys for Nucor Steel-Utah

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served *via* email this 9th day of December, 2015, to the following:

Patricia E. Schmidt
Justin C. Jetter
Rex Olsen
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datarequest@pacificorp.com

I further certify that a true and correct copy of the foregoing was served *via* hand-delivery this 9th day of December, 2015, to the following:

Division of Public Utilities
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

Office of Consumer Services
160 East 300 South, 2nd Floor
Salt Lake City, Utah 84111

/s/ Janelle L. Dannenmueller
Janelle L. Dannenmueller, Legal Assistant
Jeremy R. Cook

