Peter J. Mattheis Matthew J. Jones BRICKFIELD, BURCHETTE & RITTS, P.C. 1025 Thomas Jefferson Street, N.W. 800 West Tower Washington, D.C. 20007 Telephone: (202) 342-0800 Glen E. Davies PARSONS, DAVIES, KINGHORN & PETERS, P.C. 185 South State Street Suite 700 Salt Lake City, UT 84111 Telephone: (801) 363-4300

ATTORNEYS FOR NUCOR STEEL, A DIVISION OF NUCOR CORPORATION

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of PACIFICORP and SCOTTISH POWER PLC for an Order Approving the Issuance of PACIFICORP Common Stock ) Docket No. 98-2035-04

)

) MOTION TO INTERVENE

- ) OF NUCOR STEEL, A DIVISION
- ) OF NUCOR CORPORATION

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 abovereferenced proceeding before the Public Service Commission of Utah. In support of this Motion, Nucor states as follows:

1. Nucor owns and operates a steel mill in Plymouth, Utah, which is served by PacifiCorp (doing business as Utah Power) 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 any outcome will have a substantial effect on Nucor.

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	Glen E. Davies
Matthew J. Jones	PARSONS, DAVIES, KINGHORN & PETERS, P.C.
BRICKFIELD, BURCHETTE & RITTS, P.C.	185 South State Street
1025 Thomas Jefferson Street, N.W.	Suite 700
800 West Tower	Salt Lake City, UT 84111
Washington, D.C. 20007	

Curtis Broadbent Controller NUCOR STEEL P.O. Box 100 Plymouth, Utah 84330

5. As no order has yet been issued in this

docket setting forth a date on which interventions are due, this filing is timely.

6. Because of the early stage of this proceeding, Nucor has not yet determined what, if any, positions it will take on the various aspects of the proposed transaction, nor what relief it may seek to protect its interests.

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 3<sup>rd</sup> day of February, 1999.

Respectfully submitted,

[signed] Peter J. Mattheis	
Matthew J. Jones	
BRICKFIELD, BURCHETTE & RITTS, P.C.	
1025 Thomas Jefferson Street, N.W.	
800 West Tower	
Washington, D.C. 20007	
(202) 342-0800	
(202) 342-0807 Telefax	
Glen E. Davies	
PARSONS, DAVIES, KINGHORN & PETERS, P.C.	
185 South State Street, Suite 700	

Salt Lake City, UT 84111

(801) 363-4300