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ATTORNEYS FOR NUCOR STEEL, A DIVISION OF NUCOR CORPORATION

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of PacifiCorp for Approval of Its Proposed Electric Rate Schedules and Electric Service Regulations	) Docket No. 99-035-10 ) ) MOTION TO INTERVENE ) OF NUCOR STEEL, A DIVISION ) OF NUCOR CORPORATION
<del>-</del>	,

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. 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 be adequately 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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**Curtis Broadbent** 

Controller
NUCOR STEEL
P.O. Box 100

Plymouth, Utah 84330

- 5. Pursuant to the schedule adopted at the October 6, 1999 prehearing conference in this docket, 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 PacifiCorp's filing 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 \_\_\_\_ day of October, 1999.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 25<sup>th</sup> day of October, 1999, I caused via mail, first class, postage prepaid, a true and correct copy of the foregoing MOTION TO INTERVENE OF NUCOR STEEL, A DIVISION OF NUCOR CORPORATION to:

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