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

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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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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. 11-035-200**  
**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 filed an application for a rate increase with the Commission on February 15, 2012.

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. As a major retail customer of Rocky Mountain Power, 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 5<sup>th</sup> day of March, 2012.

Respectfully submitted,

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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 by email or US Mail, as indicated, this 6<sup>th</sup> day of March, 2012, to the following:

### **By Electronic-Mail:**

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### **By U.S. Mail:**

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Salt Lake City, Utah 84111

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/s/ Kim Waters