

Peter J. Mattheis  
Eric J. Lacey  
BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.  
1025 Thomas Jefferson Street, N.W.  
800 West Tower  
Washington, D.C. 20007  
Telephone: (202) 342-0800  
Facsimile: (202) 342-0807

Jeremy R. Cook  
PARSONS KINGHORN HARRIS, P.C.  
111 East Broadway, 11<sup>th</sup> Floor  
Salt Lake City, UT 84111  
Telephone: (801) 363-4300  
Facsimile: (801) 363-4378

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 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. 13-035-184**  
**PETITION TO INTERVENE**  
**OF NUCOR STEEL-UTAH, A DIVISION**  
**OF NUCOR CORPORATION**

---

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 January 3, 2014.

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:

Peter J. Mattheis  
Eric J. Lacey  
BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.  
1025 Thomas Jefferson Street, N.W.  
800 West Tower  
Washington, D.C. 20007  
pjm@bbrslaw.com  
elacey@bbrslaw.com

Jeremy R. Cook  
PARSONS KINGHORN HARRIS, P.C.  
111 East Broadway, 11<sup>th</sup> Floor  
Salt Lake City, UT 84111  
jrc@pkhlawyers.com

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 15<sup>th</sup> Day of January, 2014.

Respectfully submitted,

/s/ Jeremy R. Cook  
Jeremy R. Cook  
PARSONS KINGHORN HARRIS, P.C.  
111 East Broadway, 11<sup>th</sup> Floor  
Salt Lake City, UT 84111  
(801) 363-4300  
(801) 363-4378 – Facsimile

Peter J. Mattheis  
Eric J. Lacey  
BRICKFIELD, BURCHETTE, RITTS & STONE, P.C.  
1025 Thomas Jefferson Street, N.W.  
800 West Tower  
Washington, D.C. 20007  
(202) 342-0800  
(202) 342-0807 – Facsimile  
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 15<sup>th</sup> day of January, 2014, to the following:

Patricia Schmidt  
Justin Jetter  
ASSISTANT ATTORNEYS GENERAL  
Attorneys Utah DPU  
500 Heber Wells Building  
160 East 300 South  
Salt Lake City, UT 84111  
[pschmid@utah.gov](mailto:pschmid@utah.gov)  
[jjetter@utah.gov](mailto:jjetter@utah.gov)

Brent Coleman  
ASSISTANT ATTORNEY GENERAL  
Attorneys Utah OCS  
160 East 300 South, Fifth Floor  
P.O. Box 140857  
Salt Lake City, Utah 84114-0857  
[brentcoleman@utah.gov](mailto:brentcoleman@utah.gov)

Michele Beck  
Executive Director  
OFFICE OF CONSUMER SERVICES  
500 Heber Wells Building  
160 East 300 South, 2<sup>nd</sup> Floor  
Salt Lake City, UT 84111  
[mbeck@utah.gov](mailto:mbeck@utah.gov)

Chris Parker, Executive Director  
William Powell, Mgr, Energy Section  
Dennis Miller, Staff Legal Assistant  
UTAH DIVISION OF PUBLIC UTILITIES  
500 Heber Wells Building  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, UT 84111  
[ChrisParker@utah.gov](mailto:ChrisParker@utah.gov)  
[wpowell@utah.gov](mailto:wpowell@utah.gov)  
[dennismiller@utah.gov](mailto:dennismiller@utah.gov)

Cheryl Murray  
Dan Gimble  
UTAH OFFICE OF CONSUMER SERVICES  
160 East 300 South, 2<sup>nd</sup> Floor  
Salt Lake City, UT 84111  
[cmurray@utah.gov](mailto:cmurray@utah.gov)  
[dgimble@utah.gov](mailto:dgimble@utah.gov)

Mark C. Moench  
Yvonne R. Hogle  
Dave Taylor  
Barry Bell  
ROCKY MOUNTAIN POWER  
201 South Main Street, Suite 2300  
Salt Lake City, UT 84111  
[Mark.Moench@pacificorp.com](mailto:Mark.Moench@pacificorp.com)  
[Yvonne.hogle@pacificorp.com](mailto:Yvonne.hogle@pacificorp.com)  
[dave.taylor@pacificorp.com](mailto:dave.taylor@pacificorp.com)  
[barry.bell@pacificorp.com](mailto:barry.bell@pacificorp.com)

William Evans  
Parsons Behle & Latimer  
Attorneys for UIEC  
[wevans@bplutah.com](mailto:wevans@bplutah.com)

/s/ Janelle L. Dannenmueller