

Peter J. Mattheis
Eric J. Lacey
STONE MATTHEIS XENOPOULOS & BREW, 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
COHNE KINGHORN
111 East Broadway, 11th 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
APPROVAL OF A SIGNIFICANT ENERGY
RESOURCE DECISION AND VOLUNTARY
REQUEST FOR APPROVAL OF
RESOURCE DECISION

Docket No. 17-035-40

**PETITION TO INTERVENE
OF NUCOR STEEL-UTAH, A DIVISION
OF NUCOR CORPORATION**

Pursuant to Utah Code Ann. § 63G-4-207 and Utah Admin. Code § R746-1-108, 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 petition, Nucor states as follows:

1. Rocky Mountain Power filed an application for approval of a significant energy resource decision and voluntary request for approval of a resource decision on June 30, 2017.
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
STONE MATTHEIS XENOPOULOS & BREW, P.C.
1025 Thomas Jefferson Street, N.W.
800 West Tower
Washington, D.C. 20007
pjm@smxblaw.com
ejl@smxblaw.com

Jeremy R. Cook
COHNE KINGHORN
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
jcook@cohnekinghorn.com

WHEREFORE, for the reasons set forth above, Nucor requests that the Public Service Commission of Utah grant this timely Petition to Intervene and permit Nucor to participate in this proceeding with full rights as a party.

DATED this 10th day of August, 2017.

Respectfully submitted,

/s/ Jeremy R. Cook

Jeremy R. Cook
COHNE KINGHORN
111 East Broadway, 11th Floor
Salt Lake City, UT 84111
(801) 363-4300
(801) 363-4378 – Facsimile

Peter J. Mattheis
Eric J. Lacey
STONE MATTHEIS XENOPOULOS & BREW, 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 by email this 10th day of August, 2017, to the following:

Data Request Response Center

Pacificorp
datarequest@pacificorp.com

Rocky Mountain Power

jeff Richards
(robert.richards@pacificorp.com)
Yvonne Hogle
(yvonne.hogle@pacificorp.com)
Bob Lively
(bob.lively@pacificorp.com)

Hatch, James & Dodge, P.C.

Gary A. Dodge
(gdodge@hjdllaw.com)
Phillip J. Russell
(prussell@hjdllaw.com)

By Hand Delivery:

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

Pacific Power

Sarah K. Link
(sarah.kamman@pacificorp.com)
Karen J. Kruse
(karen.kruse@pacificorp.com)

Assistant Utah Attorneys General

Patricia Schmid
(pschmid@agutah.gov)
Justin Jetter
(jjetter@agutah.gov)
Robert Moore
(rmoore@agutah.gov)
Steven Snarr (stevensnarr@agutah.gov)

Division of Public Utilities

Erika Tedder
(etedder@utah.gov)

/s/ Janelle L. Dannenmueller