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

Attorneys for Nucor Steel-Utah, A Division of Nucor Corporation

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Investigation of Revenue Requirement Impacts of the New Federal Tax Legislation Titled: "An act to provide for reconciliation pursuant to titles II and V of the concurrent resolution of the budget for fiscal year 2018

Docket No. 17-035-69

Jeremy R. Cook

COHNE KINGHORN

111 East Broadway, 11th Floor

Salt Lake City, UT 84111

Telephone: (801) 363-4300 Facsimile: (801) 363-4378

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. The Public Service Commission opened this docket on December 21, 2017 to investigate the revenue requirement impacts of recent changes to federal tax laws. Rocky Mountain Power, a division of PacifiCorp, filed a Tariff Application on March 16, 2018.
- 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:

1

Nucor Steel-Utah A Division of Nucor Corporation P.O. Box 100 Plymouth, Utah 84330

- 3. Nucor's interest will be substantially affected by the outcome of these proceedings and Nucor 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, 11<sup>th</sup> 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 10<sup>th</sup> day of April 2018.

Respectfully submitted,

/s/ Jeremy R. Cook \_\_\_\_\_

Jeremy R. Cook COHNE KINGHORN 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 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 Petition to Intervene of Nucor Steel-Utah, a Division of Nucor Corporation was served <u>via</u> email this 10<sup>th</sup> day of April 2018 to the following:

#### Via Electronic Mail:

## **Pacificorp**

datarequest@pacificorp.com

### **Energy Strategies**

khiggins@energystrat.com ntownsend@energystrat.com

# <u>Counsel for UAE – Hatch, James &</u> Dodge

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

### <u>Counsel for UIEC – Parsons Behle &</u> Latimer

William J. Evans
(bevans@parsonsbehle.com)
Vicki M. Baldwin
(vbaldwin@parsonsbehle.com)
Chad C. Baker
(cbaker@parsonsbehle.com)

#### **Utah Office of Consumer Services:**

Cheryl Murray (cmurray@utah.gov) Michele Beck (mbeck@utah.gov)

### **Rocky Mountain Power**

Jana Saba (jana.saba@pacificorp.com)
Yvonne R. Hogle (yvonne.hogle@pacificorp.com)
R. Jeff Richards (robert.richards@pacificorp.com)
Bob Lively (bob.lively@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) Chris Parker (chrisparker@utah.gov)

### **E-Quant Consulting, LLC**

4

Roger Swenson (roger.swenson@prodigy.net)

/s/ Janelle L. Dannenmueller