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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 Approval of the 2020 Inter-Jurisdictional Cost Allocation Agreement

**Docket No. 19-035-42**  
**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 § R746-1-108, 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, a division of PacifiCorp, filed an Application on December 3, 2019 seeking Commission approval of the 2020 Inter-Jurisdictional Cost Allocation Agreement.

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

3. Nucor seeks to intervene for purposes of protecting its interests, which will be substantially affected by the outcome of these proceedings, and which will not adequately be represented by any other party. Nucor's participation will promote the interests of justice. Nucor has not yet determined the specific positions it will take or the precise nature of relief it will seek. Nucor's participation will not impair the orderly and prompt conduct of the proceeding.

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 Petition to Intervene and permit Nucor to participate in this proceeding with full rights as a party.

DATED this 6<sup>th</sup> day of February 2020.

Respectfully submitted,

/s/ Jeremy R. Cook

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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 this 6<sup>th</sup> day of February 2020, to the following:

**Via Email:**

**Rocky Mountain Power**

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/s/ Janelle L. Dannenmueller