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UTAH PUBLIC
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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application)
of UTAH POWER & LIGHT COMPANY)
and PC/UP&L MERGING CORP. (to be)
renamed PACIFICORP) for an Order)
Authorizing the Merger of UTAH)
POWER & LIGHT COMPANY and)
PACIFICORP into PC/UP&L MERGING)
CORP. Authorizing the Issuance)
of Securities, Adoption of Tariffs)
and Transfer of Certificates of)
Public Convenience and Necessity)
and Authorities in Connection)
Therewith.)

Case No. 87-035-27

**RESPONSE OF NUCOR STEEL
TO AMENDED PROPOSED LIST
OF STIPULATED FACTS**

Nucor Steel, a division of Nucor Corporation ("Nucor"), files this Response in accordance with the March 31, 1988, Order of the Public Service Commission of Utah ("Commission"). This Response addresses the Amended Proposed List of Stipulated Facts filed by the Utility Shareholders Association of Utah ("USAU") on April 13, 1988. The earlier filed response of Nucor Steel to

Proposed List of Stipulated Facts filed with the Commission on March 24, 1988, is incorporated herein by reference.

The USAU has made it clear that the Amended Proposed List of Stipulated Facts has not been presented for adoption as written. As stated by the USAU, the amended stipulated facts "... are, of course, for the purpose of initiating discussions among the parties and regulatory officials that may culminate in a final stipulation that could obviate the need to elicit evidence on certain issues." The USAU goes on to say that "the listings are . . . to be taken for present purposes as proposals for discussion and not necessarily as complete, final statements of established fact."

The foregoing explains the format of the Amended Proposed List of Stipulated Facts which are cast not in a form of factual statement to which other parties can stipulate but in the form of argued positions to which other parties may respond.

Accordingly, Nucor incorporates specifically by reference its Statement of Proposed Facts in Dispute filed as part of its earlier filed Response of Nucor Steel to Proposed List of Stipulated Facts and accepts the invitation of the USAU to have "discussions among the parties" in connection with the preparation of uncontroverted facts for stipulation by the parties to this proceeding.

CONDITIONS

Nucor submits this Response in accordance with the Commission's April 13, 1988, Order and reserves the right to supplement this Response.

DATED this 15th day of April, 1988.


RITTS, BRICKFIELD & KAUFMAN

By


Peter J.P. Brickfield
Kenneth G. Hurwitz

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Andrew W. Buffmire
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MAILING CERTIFICATE

On this 15th day of April, 1988, I hereby certify that I caused to be mailed, via United States first class mail, postage prepaid, a true and accurate copy of RESPONSE OF NUCOR STEEL TO AMENDED PROPOSED LIST OF STIPULATED FACTS, to the parties listed below:

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