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Peter J.P. Brickfield, Esq.
Kenneth G. Hurwitz, Esq.
RITTS, BRICKFIELD & KAUFMAN
Watergate 600 Building, Suite 915
600 New Hampshire Avenue, N.W.
Washington, D.C. 20037
Telephone: (202) 342-0800

Andrew W. Buffmire, Esq
William P. Schwartz, Esq.
HANSEN & ANDERSON
Valley Tower Building, Suite 600
50 West Broadway
Salt Lake City, Utah 84101
Telephone: (801) 532-7520

Attorneys for Nucor Steel,
A Division of Nucor Corporation

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the)	
Application of UTAH POWER &)	Case No. 87-035-27
LIGHT COMPANY and PC/UP&L)	
MERGING CORP. (to be renamed)	
PACIFICORP) for an Order)	
Authorizing the Merger of UTAH)	NUCOR STEEL'S SUPPLEMENTAL
POWER & LIGHT COMPANY and)	ANSWERS TO APPLICANTS'
PACIFICORP into PC/UP&L MERGING)	FIRST SET OF INTERROGATORIES
CORP. Authorizing the Issuance)	AND SUPPLEMENTAL RESPONSE TO
of Securities, Adoption of)	APPLICANTS' FIRST REQUEST FOR
Tariffs and Transfer of)	PRODUCTION OF DOCUMENTS
Certificates of Public)	
Convenience and Necessity and)	
Authorities in Connection)	
Therewith)	

Nucor Steel hereby provides the following supplemental answers to the Applicants' First Set of Interrogatories and Request for Production of Documents:

INTERROGATORIES

INTERROGATORY NO. 1: With respect to each expert with whom you have consulted or whom you have retained in connection with any of the issues in this proceeding, state the following:

- (a) The identity of such expert;
- (b) The date such expert was retained;
- (c) His address;
- (d) His area of purported expertise;
- (e) His educational background, formal training and experience in his area of purported experience;
- (f) His present employment and his employment for each of the preceding ten years;
- (g) A list of all other cases in which such expert has been consulted, retained or testified as an expert including:
 - (i) State or jurisdiction;
 - (ii) Court or administrative agency;
 - (iii) Case or docket number;
 - (iv) Brief description of case;
 - (v) In whose behalf was expert retained;
 - (vi) Date of appearance.

SUPPLEMENTAL ANSWER:

- (a) Nucor Steel has retained Robert M. Spann.
- (b) Robert M. Spann was retained some time at the end of March, 1988.

(c) Robert M. Spann's business address is:

ICF Consulting Associates
1850 K Street, N.W.
Washington, D.C. 20007

(d), (e), (f), & (g) Please refer to the attached resume of Robert M. Spann.

INTERROGATORY NO. 2: Identify all witnesses, expert or otherwise, you intend to call in this proceeding.

Supplemental Answer

Robert M. Spann. Nucor Steel has not yet determined any other witnesses, expert or otherwise, which it intends to call in this proceeding.

INTERROGATORY NO. 3: With respect to each witness you have identified in your answer to Interrogatory No. 2, state:

- (a) The issues in this proceeding of which he has knowledge;
- (b) The manner in which he obtained such knowledge, i.e., eyewitness, participant, investigator, employee, etc.;
- (c) Identify any written or recorded statements or reports received from him by you, or your counsel, agent or employee; and
- (d) State which issues in this proceeding the witness' testimony will address and briefly state his position on those issues.

Supplemental Answer

(a), (b) & (c) Nucor objects to subparts (a), (b) & (c) on the grounds that they are unnecessarily burdensome and

would improperly require the production of attorney work product.

- (d) Please refer to the attached testimony of Robert M. Spann filed on the 11th day of April, 1988 with the Utah Commission in this proceeding.

INTERROGATORY NO. 4: For each witness identified in your answer to Interrogatory No. 3, please identify all documents considered or relied upon by the witness including, but not limited to, all computer programs which have been used, or are currently being used, to analyze the proposed merger.

Supplemental Answer

The materials reviewed include testimony, discovery responses, and transcript of the hearing in FERC Docket No. EC-88-2-000.

The testimony and data responses in this proceeding were also reviewed.

INTERROGATORY NO. 5: For each expert identified in your answer to Interrogatory No. 1 that you will not call as a witness in this proceeding, please identify all documents prepared or relied upon by the expert in connection with any of the issues in this proceeding.

Supplemental Answer

Please refer to the Supplemental Answer to Interrogatory No. 2.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: Produce all documents identified in answer to the foregoing interrogatories.


Supplemental Answer

Copies of the documents identified are in the Applicants' possession.

DATED this 14th day of April, 1988.

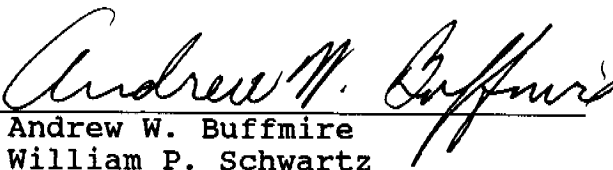
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