Damon E. Xenopoulos

Laura W. Baker

STONE MATTHEIS XENOPOULOS & BREW, PC

1025 Thomas Jefferson Street, N.W.

Suite 800 West

Washington, DC 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

IN THE MATTER OF THE APPLICATION OF DOMINION ENERGY UTAH TO INCREASE DISTRIBUTION RATES AND CHARGES AND MAKE TARIFF MODIFICATIONS **Docket No. 22-057-03**

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 Motion, Nucor states as follows:

- 1. On May 2, 2022, Questar Gas Company d/b/a Dominion Energy Utah ("Dominion") filed with the Commission an application seeking Commission approval to increase distribution rates and to make tariff modifications.
- 2. Nucor owns and operates a steel mill in Plymouth, Utah, and takes natural gas transportation service from Dominion. 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. As a major transportation customer of Dominion, Nucor has a direct interest in

these proceedings, and the outcome may have a substantial effect on Nucor's legal rights and

interests. Nucor has not yet determined what, if any, positions it will take on any issues raised, nor

the relief it may seek to protect its interests.

4. Nucor's interest in the outcome of these proceedings will not be adequately

represented by any other party, nor will the interests of justice nor the orderly and prompt conduct

of these proceedings be materially impaired if Nucor is allowed to intervene.

5. The following persons should be included on the service list in these proceedings,

and all communications concerning this matter should be addressed to:

Damon E. Xenopoulos

Laura W. Baker

Stone Mattheis Xenopoulos & Brew, PC

1025 Thomas Jefferson Street, N.W.

Suite 800 West

Washington, DC 20007

Telephone: (202) 342-0800

Email: dex@smxblaw.com

Facsimile: (202) 342-0807

lwb@smxblaw.com

6. Pursuant to Utah Admin. Code § R746-1-107(1)(a)(ii), Nucor includes the

certificates of good standing for the following attorneys licensed to practice in a foreign state:

Damon E. Xenopoulos (District of Columbia)¹

Laura W. Baker (District of Columbia)²

7. This filing is timely.

¹ Admitted to the District of Columbia, New York, and California bars (currently selected "inactive" status in California).

² Admitted to the District of Columbia and Virginia bars.

2

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

DATED this 20th day of May 2022.

Respectfully submitted,

/s/ Damon E. Xenopoulos

Damon E. Xenopoulos Laura W. Baker Stone Mattheis Xenopoulos & Brew, PC 1025 Thomas Jefferson Street, N.W. Suite 800 West Washington, DC 20007

Telephone: (202) 342-0800 Facsimile: (202) 342-0807 Email: dex@smxblaw.com

lwb@smxblaw.com

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



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, the District of Columbia Bar does hereby certify that

Damon & Lenopoulos

was duly qualified and admitted on October 4, 1993 as an attorney and counselor entitled to practice before this Court; and is, on the date indicated below, a(n)

ACTIVE member in good standing of this Bar.

In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of
Washington, D.C., on May 14,
2022.

JULIO A. CASTILLO
Clerk of the Court

Issued By:

District of Columbia Bar Membership



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, the District of Columbia Bar does hereby certify that

Laura Wynn Baker

was duly qualified and admitted on January 25, 2017 as an attorney and counselor entitled to practice before this Court; and is, on the date indicated below, a(n)

ACTIVE member in good standing of this Bar.

In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of
Washington, D.C., on May 11,
2022.

JULIO A. CASTILLO
Clerk of the Court

Issued By:

District of Columbia Bar Membership

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 20th day of May 2022, to the following:

Via Email:

Cameron Sabin (<u>csabin@mayerbrown.com</u>) Mayer Brown LLP

Jenniffer Clark (jenniffer.clark@dominionenergy.com)
Kelly Mendenhall (kelly.mendenhall@dominionenergy.com)
Austin Summers (austin.summers@dominionenergy.com)
Dominion Energy Utah

Patricia Schmid (<u>pschmid@agutah.gov</u>) Justin Jetter (<u>jjetter@agutah.gov</u>) Robert Moore (<u>rmoore@agutah.gov</u>) Assistant Utah Attorneys General

Madison Galt (<u>mgalt@utah.gov</u>) Division of Public Utilities

Alyson Anderson (<u>akanderson@utah.gov</u>)
Bela Vastag (<u>bvastag@utah.gov</u>)
Alex Ware (<u>aware@utah.gov</u>)
(<u>ocs@utah.gov</u>)
Office of Consumer Services

Maj. Holly L. Buchanan (holly.buchanan.1@us.af.mil)
Thomas A. Jernigan (Thomas.jernigan.3@us.af.mil)
TSgt Rafael A. Franjul (Rafael.franjul@us.af.mil)
Ebony M. Payton (ebony.payton.ctr@us.af.mil)
(ULFSC.Tyndall@us.af.mil)
Federal Executive Agencies

Phillip J. Russell (<u>prussell@jdrslaw.com</u>)
Kevin Higgins (<u>khiggins@energystrat.com</u>)
Neal Townsend (<u>ntownsend@energystrat.com</u>)
Millicent Pichardo (<u>mpichardo@energystrat.com</u>)
Utah Association of Energy Users

/s/ Laura W. Baker
Laura W. Baker