BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2015-1-E

IN THE MATTER OF:	)	
	)	**PETITION TO INTERVENE**
Annual Review of Base Rates	)	**BY NUCOR STEEL –**
for Fuel Costs of Duke Energy	)	**SOUTH CAROLINA**
Progress, Inc.	)	
	)	

Nucor Steel-South Carolina ("Nucor"), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Duke Energy Progress, Inc. ("DEP") (formerly known as Progress Energy ("Progress Energy") and Carolina Power & Light Company ("CP&L")), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars a year. Since the cost of electricity comprises one of the major costs of Nucor's manufacturing process, electric costs directly affect Nucor's ability to continue to produce steel at a competitive price.

2. This docket has been established to review DEP's historical and projected fuel costs and to determine the appropriate fuel factor for the next twelve months. Nucor has a stake in, and will be directly and substantially affected by, the outcome of this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. At this early stage in the proceeding, Nucor has not fully determined what position it may take and how long it will take to complete its presentation and any cross-examination during the public hearing established in this proceeding. Since 1987, Nucor has actively

participated in many previous Progress Energy and CP&L fuel and rate proceedings before this Commission.

3. Nucor's mailing address is:

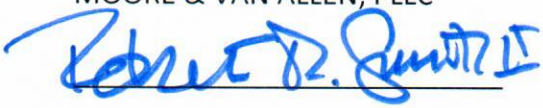
Nucor Steel – South Carolina
P.O. Box 525
Darlington, SC 29532

4. Nucor will be jointly represented in this proceeding by the firms of Brickfield, Burchette, Ritts & Stone, P.C and Moore & Van Allen, PLLC. Brickfield, Burchette, Ritts & Stone, P.C. represents Nucor in matters regarding electric rates and service in jurisdictions throughout the United States. In the past few years, attorneys of the firm have appeared before this Commission, the Federal Energy Regulatory Commission, and many other state utility commissions. In accordance with Rule 103-804 T(1)(b) of the Commission's Rules of Practice and procedure, for the purposes of this proceeding, Brickfield, Burchette, Ritts & Stone, P.C. is associated with the firm of Moore & Van Allen, PLLC, whose attorneys are licensed to practice in South Carolina. Service and correspondence regarding this proceeding should be sent to both the undersigned firms.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC



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Counsel for Nucor Steel – South Carolina

Dated: January 30, 2015

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	)	

This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail, electronic mail, telefax or Federal Express on this the 30th day of January, 2015:

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