

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH
CAROLINA**

DOCKET NO. 2015-8-E

IN THE MATTER OF:)	
)	PETITION TO INTERVENE
Duke Energy Progress, Inc.'s)	BY NUCOR STEEL –
Integrated Resource Plan (IRP))	SOUTH CAROLINA
)	

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 Carolinas, Inc. (“PEC”) 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 2015 Integrated Resource Plan (“IRP”) which DEP submits annually “detailing potential infrastructure needed to match the forecasted electricity requirements for our customers.” IRP at 2. In Order No. 2012-95, the Commission determined that the IRP process constitutes a proceeding under Section 103-804(Q) of the Commission’s regulations, and that intervention in these proceedings would be permitted.
3. As a large industrial customer of DEP, Nucor has an interest in the topics addressed in the IRP, including DEP’s current long-term energy and demand forecasts, DEP’s plans

to meet its future resource needs, and the effect of possible joint planning scenarios with Duke Energy Carolinas. Accordingly, 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. Since 1987, Nucor has actively participated in many previous DEP, PEC and CP&L fuel and rate proceedings before this Commission. Nucor has not yet determined what its position may be in this proceeding.

4. Nucor's mailing address is:

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

5. Nucor will be represented in this proceeding by the firm Moore & Van Allen, PLLC. Service and correspondence regarding this proceeding should be sent to the undersigned.

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: November 25, 2015

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CERTIFICATE OF SERVICE

This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail, fax or Federal Express on this the 25 day of November, 2015:

Heather R. Smith
Deputy General Counsel
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