

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Avista Corporation,)	
Bonneville Power Administration,)	
Idaho Power Company,)	
Montana Power Company,)	
Nevada Power Company,)	Docket No. RT01 -35-005
Pacific Corp,)	
Portland General Electric Company,)	
Puget Sound Energy, Inc.,)	
Sierra Pacific Power Company)	

**MOTION TO INTERVENE OF
NUCOR STEEL - UTAH, A DIVISION OF NUCOR CORPORATION**

Pursuant to Rule 214 of the Commission's Rules of Practice and Procedure, 18 C.F.R. § 385.214, and the April 9, 2002 "Notice of Filing," the April 10, 2002 "Errata Notice," and the April 17, 2002 "Notice of Extension of Time" in this docket, Nucor Steel Utah, a division of Nucor Corporation ("Nucor Steel"), hereby moves to intervene in the above-captioned docket. In support of its motion, Nucor Steel states as follows:

1. All correspondence related to this proceeding should be addressed to:

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2. Nucor Steel owns and operates a steel production facility near Plymouth, Utah, using an electric arc furnace to melt recycled scrap steel. Nucor Steel is a transmission voltage (138 kV) power customer of PacifiCorp. Nucor Steel purchases hundreds of millions of kWh of electricity annually from PacifiCorp at a cost of millions of dollars, and is one of PacifiCorp's largest retail customers. Because the cost of electricity comprises one of the major costs of Nucor Steel's manufacturing process, the cost and availability of electric power directly affects Nucor Steel's ability to produce steel at a competitive price.

3. On March 28, 2002, Avista Corporation, the Bonneville Power Administration, Idaho Power Company, NorthWestern Energy, LLC, Nevada Power Company, PacificCorp, Portland General Electric Company, Puget Sound Energy, Inc. and Sierra Pacific Power Company, joined by British Columbia Hydro and Power Authority, a non-jurisdictional Canadian utility (collectively, the "Filing Utilities"), submitted a *Stage 2 Filing and Request for Declaratory Order Pursuant to Order 2000* ("Stage 2 Filing") with the Federal Energy Regulatory Commission ("Commission"). On April 22, 2002, the Filing Utilities submitted a second filing correcting certain errors in the Stage 2 Filing. The Stage 2 Filing, as corrected, is a request by the Filing Utilities for the Commission to make a complete determination as to whether their proposed "RTO West" fulfills all of the characteristics and functions of a regional transmission organization ("RTO") required by the Commission's Order No. 2000.¹

¹ The Commission, in its Order on the Filing Utilities' "Stage 1" filing, conditionally approved the Independence, and Scope and Regional Configuration characteristics of the proposed RTO West. 95 FERC ¶61,114 (2001).

4. As a customer of PacifiCorp within the geographic scope of the proposed RTOWest, the price and availability of electric power to Nucor Steel will be directly and substantially affected by the outcome of this proceeding.² Moreover, if Nucor Steel obtains access to electric power markets via either federal or state legislation, Nucor Steel would expect to take transmission service pursuant to terms and conditions established in this proceeding. Therefore under the Commission's Rule 214, Nucor Steel has a right to intervene in this proceeding.

5. Nucor Steel's interests will not be adequately represented by any other party to this proceeding. Therefore, Nucor Steel's participation in this proceeding serves the public interest.

WHEREFORE, Nucor Steel respectfully requests that the Commission permit it to intervene as a party in this proceeding, with all rights appropriate to that status.

Respectfully submitted,

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Attorneys for Nucor Steel - Utah, A Division of
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Dated: May 29, 2002

² Nucor Steel was also a party to the Commission's proceeding to consider the Filing Utilities' "Stage 1" filing based upon the Commission's grant of intervention in Docket No. RT01-35-000.95 FERC ¶ 61,114, at 61,323 & App. A (2001).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the parties identified on the Commission's official service list by depositing copies thereof in the United States mail, first class, postage prepaid.

Dated at Washington, D.C. this 29th day of May, 2002.

Shaun C. Mohler