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INTERVENTION
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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONERS

SUSAN BITTER SMITH – CHAIRMAN

BOB STUMP

BOB BURNS

DOUG LITTLE

TOM FORESE

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION
OF UNS ELECTRIC, INC. FOR THE
ESTABLISHMENT OF JUST AND
REASONABLE RATES AND CHARGES
DESIGNED TO REALIZE A REASONABLE
RATE OF RETURN ON THE FAIR VALUE
OF THE PROPERTIES OF UNS ELECTRIC,
INC. DEVOTED TO ITS OPERATIONS
THROUGHOUT THE STATE OF ARIZONA
AND FOR RELATED APPROVALS.

DOCKET NO. E-04204A-15-0142

PETITION TO INTERVENE**PETITION TO INTERVENE OF NUCOR CORPORATION**

Nucor Corporation ("Nucor") by and through its undersigned counsel, and pursuant to R14-3-105, hereby respectfully requests the Arizona Corporation Commission issue an order granting it leave to intervene in the above-referenced docket. As part of this Motion, Nucor states the following:

1. Name and Address of Petitioner:

Nucor Steel Kingman LLC
c/o Doug Adams
3000 W. Old Hwy 66
Kingman, AZ 86413
(928) 718-9205

2. Name and Address of Attorneys Representing Petitioner:

Service of all documents or pleadings should be made to Nucor's counsel at the following addresses:

1 Eric J. Lacey, Esq.
2 Stone Mattheis Xenopoulos & Brew, P.C.
3 1025 Thomas Jefferson St., NW 8th Floor, West Tower
4 Washington, DC 20007-5201
Telephone: 202-342-0800 Fax: 202-342-0807
Email: ejl@smxblaw.com

5 Robert J. Metli, Esq.
6 Munger Chadwick, P.L.C.
7 2398 East Camelback Road, Suite 240
8 Phoenix, AZ 85016
Telephone: 602-358-7348 Fax: 602-441-2779
Email: rjmetli@mungerchadwick.com

9 Mr. Lacey is an out-of-state attorney licensed to practice in Virginia and Washington,
10 D.C. Robert J. Metli, Esq. will serve as local counsel to Nucor and will be filing a pro hac vice
11 motion seeking permission to have Mr. Lacey participate in this case.

12 **3. Identify the Petitioner:**

13 Nucor owns and operates a steel mill in Kingman, Arizona, which is served by UNS
14 Electric. Nucor is currently served through the Large Power Service-Time Of Use tariff.

15 **4. Petitioner's Interest in this Proceeding:**

16 Nucor is one of the largest producers of steel in the United States. The Kingman mill
17 purchases tens of millions of kWh of electricity from UNS Electric annually. If UNS Electric's
18 petition is granted as proposed, the cost for electric power for Nucor could be substantially
19 impacted. Nucor has a substantial and vital interest in the outcome of this proceeding which
20 cannot be adequately represented by any other party. Granting Nucor intervenor status will not
21 delay this proceeding, unduly broaden the issues or prejudice UNS Electric.

22 **5. Issues to Be Raised:**

23 Nucor intends to address whether the changes to UNS Electric's rates are just and
24 reasonable, including the impact of the rate increase and rate design.

1 RESPECTFULLY SUBMITTED this 27th day of May, 2015.

2 MUNGER CHADWICK, P.L.C.

3
4 By 

5 Robert J. Metli
6 2398 E. Camelback Road, Ste. 240
7 Phoenix, Arizona 85016
8 **COUNSEL FOR NUCOR CORP.**

9 ORIGINAL and thirteen (13) copies of the
10 foregoing filed this 27th day of May, 2015, with:

11 Docket Control
12 ARIZONA CORPORATION COMMISSION
13 1200 West Washington Street
14 Phoenix, Arizona 85007

15 COPY of the foregoing mailed/emailed/hand-
16 delivered this 27th day of May, 2015, to:

17 Lyn Farmer
18 Chief Administrative Law Judge
19 Hearing Division
20 Arizona Corporation Commission
21 1200 West Washington
22 Phoenix, Arizona 85007

23 Dwight Nodes
24 Assistant Chief Administrative Law Judge
25 Arizona Corporation Commission
26 1200 West Washington
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