

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

**DOCKET NO. E-2, SUB 1249
DOCKET NO. E-7, SUB 1237
DOCKET NO. E-22, SUB 585**

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Petition for Expedited Approval of Temporary Adjustments to Electricity Billing Demand Charges)))))	PETITION TO INTERVENE AND INITIAL COMMENTS OF NUCOR STEEL-HERTFORD
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PETITION TO INTERVENE

Pursuant to Rule 1-7 and Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission (the “Commission”), Nucor Steel-Hertford (“Nucor”), a division of Nucor Corporation, hereby moves to intervene in the above-captioned proceeding. In support of its petition, Nucor states:

1. On March 31, 2020, Carolina Utility Customers Association, Inc. (“CUCA”) filed a petition in the above-captioned dockets requesting that the Commission grant expedited approval of temporary adjustments to minimum and maximum billing electricity demand charges under various commercial and industrial rate schedules of Duke Energy Carolinas, LLC (“DEC”), Duke Energy Progress, LLC (“DEP”), and Virginia Electric and Power Company, Inc. d/b/a Dominion Energy North Carolina (“DENC”).
2. Nucor is a corporation organized pursuant to the laws of the State of Delaware with its corporate headquarters located at 1915 Rexford Road, Charlotte, North Carolina 28211.
3. Nucor owns and operates a steel recycling facility located in Hertford County, North Carolina, which produces steel plate. Nucor is an industrial customer of

DENC and takes service pursuant to a special contract for electric service, as amended, subject to the jurisdiction of the Commission.

4. As a current industrial customer of DENC, Nucor has an interest that is directly affected by the outcome of this proceeding, and, in accordance with the Commission's Rule R1-19, has a right to intervene in this proceeding.

5. Nucor's interest is not adequately represented by any other party, and Nucor should not be consolidated with any party or group of parties.

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

Joseph W. Eason
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and to:

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*Of Counsel

INITIAL COMMENTS

Pursuant to the Order Joining Necessary Parties and Requesting Comments dated April 2, 2020, in the above-captioned proceeding, Nucor submits the following Initial Comments:

1. In its Petition in the above-captioned proceeding, CUCA seeks expedited approval of temporary adjustments to electric billing demand charges for customers of DEC, DEP, and DENC. Specifically relevant to these comments, CUCA requests such adjustments for DENC's Rate Schedules 10, 5, 5C, 5P, 6C, 6L, 6P, 6VP, and 7.

2. Nucor is an industrial customer of DENC and takes service pursuant to a special contract for electric service, as amended, subject to the jurisdiction of the Commission. Nucor's public contract terms are incorporated into DENC's tariff as Schedule NS. Schedule NS is not listed as one of the rate schedules for which CUCA seeks temporary adjustments.

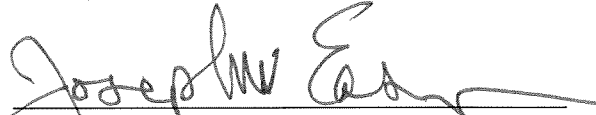
3. Nucor is generally supportive of CUCA's petition to mitigate the impact of the novel coronavirus ("COVID-19"). As Schedule NS is not listed as one of the rate schedules for which CUCA seeks temporary adjustments, Nucor respectfully requests that the Commission extend any temporary adjustments to billing demand charges to Schedule NS.

WHEREFORE, Nucor respectfully requests that the Commission:

- (i) allow it to intervene in this proceeding and become a party thereto for all purposes; and
- (ii) extend any temporary adjustments to billing demand charges to Schedule NS.

Respectfully submitted,

By:



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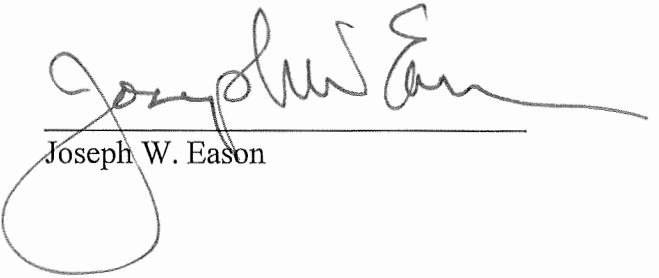
Attorneys for Nucor Steel-Hertford

Dated: April 9, 2020

VERIFICATION

Joseph W. Eason, first being duly sworn, deposes and says that he is the attorney for Nucor Steel-Hertford; that he has read the foregoing Petition to Intervene and Initial Comments and that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of Nucor.

This 9th day of April 2020.



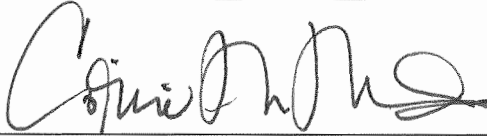
Joseph W. Eason

North Carolina

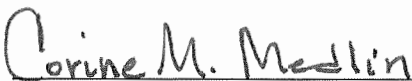
Wake County

Sworn to and subscribed before me

This 9th day of April, 2020.



Notary Public



Print Notary Public Name

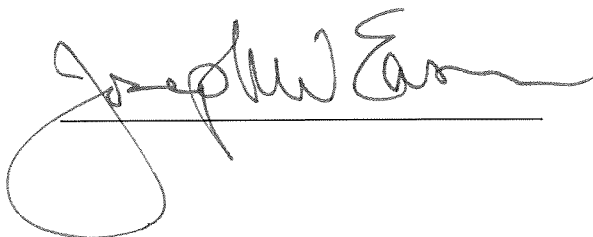


My Commission Expires: 8/13/2021

CERTIFICATE OF SERVICE

The undersigned attorney for Nucor Steel–Hertford hereby certifies that he served the foregoing Petition to Intervene and Initial Comments upon the parties of record in this proceeding by electronic mail and/or depositing copies in the United States mail, postage prepaid.

This 9th day of April 2020.

A handwritten signature in cursive script, appearing to read "Joseph W. Egan", is written over a horizontal line.