

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. E-22, SUB 605

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of Application by)	
Virginia Electric and Power)	
Company, d/b/a Dominion Energy)	PETITION TO INTERVENE OF
North Carolina, for Authority to)	NUCOR STEEL-HERTFORD
Adjust its Electric Rates and)	
Charges and Revise its Fuel Factor)	
Pursuant to N.C. Gen. Stat § 62-)	
133.2 and NCUC Rule R8-55)	

Pursuant to Rule 1-7 and Rule R1-19 of the Rules and Regulations of the North Carolina Utilities 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 August 10, 2021, Virginia Electric and Power Company d/b/a Dominion Energy North Carolina (hereinafter “DENC”) filed an application to change the fuel component of its electric rates.
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 a customer of DENC and takes service pursuant to a special contract for electric service, as amended, subject to the jurisdiction of the North Carolina Utilities Commission.
4. As a current 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
Christopher J. Blake
Nelson, Mullins, Riley & Scarborough, LLP
4140 Parklake Avenue, Suite 200
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Raleigh, NC 27622-0519
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Facsimile: (919) 329-3799
joe.eason@nelsonmullins.com
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and also to:

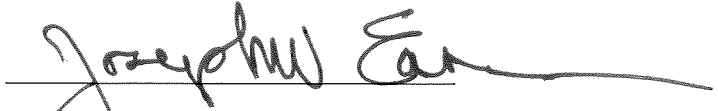
Damon E. Xenopoulos*
Stone Mattheis Xenopoulos & Brew, PC
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Suite 800 West
Washington, D.C. 20007
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dex@smxblaw.com

*Of Counsel

7. Pursuant to NCUC Rule R1-39, Nucor consents to electronic service of all pleadings and other papers in this matter.

WHEREFORE, Nucor respectfully requests that the Commission allow it to intervene in this proceeding and become a party thereto for all purposes.

Respectfully submitted,

By: 

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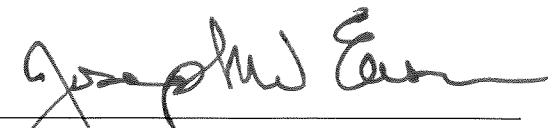
Attorneys for Nucor Steel-Hertford

Dated: September 9, 2021

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 that the same is true of his personal knowledge, except as to any matters and things therein stated on information and belief, and 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 September, 2021.

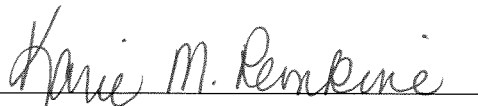


Joseph W. Eason

North Carolina

Wake County

Sworn to and subscribed before me this 9th day of September, 2021.



Notary Public

Karie M. Rankine
Print Notary Public Name

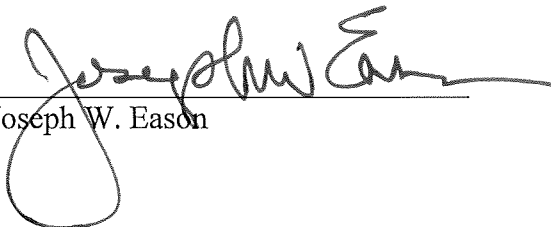
**KARIE M. RANKINE
NOTARY PUBLIC
WAKE COUNTY, N.C.**

My Commission Expires: 4/7/2025

CERTIFICATE OF SERVICE

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

This the 9th day of September, 2021.



Joseph W. Eason