# STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

## DOCKET NO. G-9, SUB 837

### BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of	)	
Application of Piedmont Natural Gas	)	
Company, Inc. for an Adjustment of Rates,	)	
Charges, and Tariffs Applicable to Service	)	PETITION TO INTERVENE OF
in North Carolina, Continuation of its IMR	)	NUCOR STEEL-HERTFORD
Mechanism, Adoption of New Depreciation	)	
Rates for its Utility Property, Regulatory	)	
Asset Accounting Treatment for Certain	)	
Operating Expenses, and Other Relief	)	

Pursuant to Rule R1-7 and Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission (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 April 1, 2024, Piedmont Natural Gas Company, Inc. (Piedmont) filed a general rate application with the Commission.
- 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 Piedmont and takes service pursuant to a special contract for natural gas service subject to the Commission's jurisdiction.

- 4. As a current customer of Piedmont, 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:

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7. Pursuant to Commission 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,

NELSON MULLINS RILEY & SCARBOROUGH, LLP

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Attorneys for Nucor Steel-Hertford

Dated: June 5, 2024

#### **VERIFICATION**

Robert B. Josey, 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 as to those, he believes them to be true; and that he is authorized to sign this verification on behalf of Nucor.

This 5th day of June 2024.

Robert B. Josey

North Carolina

Wake County

Sworn to and subscribed before me this 5th day of June 2024.

Notary Public

Karie M. Rankine

Print Notary Public Name

My Commission Expires: 4/7/2025

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

### 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 5th day of June 2024.

Robert B. Josey