

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH

DOCKET NO. E-100, SUB 178

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

**In the Matter of Rulemaking** )  
**Proceeding to Implement** ) **PETITION TO INTERVENE OF**  
**Performance-Based Regulation of** ) **NUCOR STEEL-HERTFORD**  
**Electric Utilities** )

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 October 14, 2021, the North Carolina Utilities Commission (“Commission”) issued an Order Requesting Comments and Proposed Rules on the implementation of performance-based regulation (“PBR”) as authorized in N.C.G.S. § 62-133.16.
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 Virginia Electric and Power Company d/b/a Dominion Energy North Carolina (hereinafter “DENC”) and takes service pursuant to a special contract for electric service, as amended, subject to the jurisdiction of the Commission.
4. By the Commission’s Order Requesting Comments and Proposed Rules, the Commission made DENC a party to this docket.
5. 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.

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

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

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Post Office Box 30519  
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and also to:

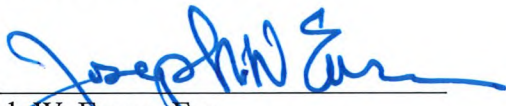
Damon E. Xenopoulos\*  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson Street, N.W.  
Suite 800 West  
Washington, D.C. 20007  
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Facsimile: (202) 342-0807  
dex@smxblaw.com

\*Of Counsel

8. 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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Christopher J. Blake, Esq.  
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\*Of Counsel

*Attorneys for Nucor Steel-Hertford*

Dated: October 20<sup>th</sup>, 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 28<sup>th</sup> day of October, 2021.

Joseph W. Eason  
Joseph W. Eason

North Carolina

Wake County

Sworn to and subscribed before me this 28 day of October, 2021.

Wanda B. Gilchrist  
Notary Public

Wanda B. Gilchrist  
Print Notary Public Name

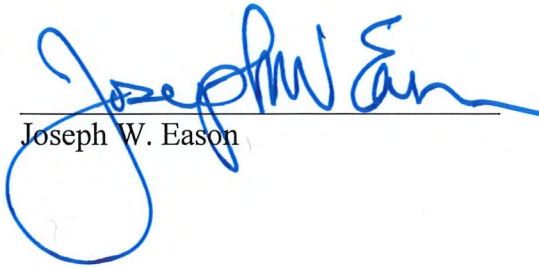


My Commission Expires: 7-24-2023

**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 20<sup>th</sup> day of October, 2021.

  
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Joseph W. Eason