



5. As a customer responsible for paying EKPC's G&T costs, which may ultimately increase as a result of any approved Company IRP, Nucor has a substantial interest in this proceeding. Moreover, potential PJM market rule changes currently under consideration at the Federal Energy Regulatory Commission may impact EKPC's future resource planning decisions.<sup>1</sup> Given that those changes may impact EKPC's planning decisions, it is important that the interests of large energy-intensive customers are represented in this proceeding.

6. The matters being decided by the Commission in this case may have a significant impact on the rates paid by Nucor for electricity. Electricity represents a significant cost of doing business for Nucor. The attorneys for Nucor authorized to represent them in this proceeding and to take service of all documents are:

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7. Nucor has filed a timely motion to intervene in this proceeding.

8. Nucor's interest cannot be adequately represented by any existing party. While the Kentucky Attorney General's Office of Rate Intervention is statutorily charged with representing the interests of "*consumers*" pursuant to KRS 367.150(8), that duty relates primarily to residential customers. In contrast, Nucor's interest is exclusively related to a large energy-intensive industrial customer.

9. The position of Nucor cannot be adequately represented by any existing party. Further, Nucor intends to play a constructive role in the Commission's decision-making process.

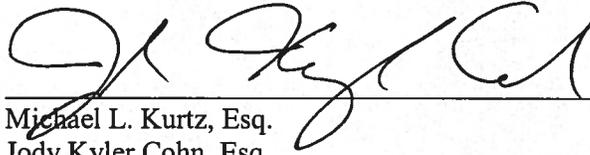
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<sup>1</sup> Capacity Repricing or in the Alternative MOPR-Ex Proposal: Tariff Revision to Address Impacts of State Public Policies on the PJM Capacity Market, FERC Docket No. ER18-1314 (April 9, 2018); Order Rejecting Proposed Tariff Revisions, Granting in Part and Denying in Part Complaint, and Instituting Proceeding Under Section 206 of the Federal Power Act, Docket Nos. EL18-187 *et al.*, (June 29, 2018).

10. Nucor's intervention will not unduly complicate or disrupt the proceedings.

**WHEREFORE**, Nucor requests that it be granted full intervenor status in the above-captioned proceeding.

Respectfully submitted,



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**COUNSEL FOR NUCOR STEEL GALLATIN**

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