

COMMONWEALTH OF KENTUCKY
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BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:	:	
ELECTRONIC 2022 INTEGRATED RESOURCE PLAN OF EAST KENTUCKY POWER COOPERATIVE, INC.	:	CASE NO. 2022-00098

**MOTION TO INTERVENE OF
NUCOR STEEL GALLATIN**

Pursuant to 807 KAR 5:001, Section 4(11), KRS 278.310, and KRS 278.040(2), Nucor Steel Gallatin (“Nucor”) requests that it be granted full intervenor status in the above-captioned proceeding(s) and states in support thereof as follows:

1. 807 KAR 5:001, Section 4(11)(a)(1) requires that a person requesting leave to intervene as a party to a case before the Kentucky Public Service Commission (“Commission”), by timely motion, must state his or her interest in the case and how intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

2. 807 KAR 5:001, Section 4(11)(b) provides that the Commission shall grant a person leave to intervene if the Commission finds that he or she has made a timely motion for intervention and that he or she has a special interest in the case that is not otherwise adequately represented or that his or her intervention is likely to present issues or to develop facts that assist the Commission in fully considering the matter without unduly complicating or disrupting the proceedings.

3. Nucor is the largest end-use electric customer located in the Owen Electric Cooperative (“Owen”) service territory. Owen is in turn provided with generation and transmission (“G&T”) service by East Kentucky Power Cooperative, Inc. (“EKPC” or “Company”).

4. The attorneys for Nucor authorized to represent them in this proceeding and to take service of all documents are:

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

6. 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 is a large industrial customer who takes service on a different rate schedule than residential customers.

7. Nucor’s intervention is likely to present issues or develop facts that will assist the Commission in fully considering the matters at hand. Nucor is a member of Kentucky Industrial Utility Customers, Inc. (“KIUC”), which has participated in ratemaking matters before this Commission since 1978 and was formally incorporated in 1983. Over the past 30 years alone, KIUC has intervened in approximately one hundred cases addressing electric rate and service issues. Nucor will be a helpful and active participant should its request to intervene be granted.

8. Nucor intends to play a constructive role in the Commission’s decision-making process.

9. 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,

/s/ Michael L Kurtz

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COUNSEL FOR NUCOR STEEL GALLATIN