Nelson Mullins

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N.C. Utilities Office N.C. Utilities Commission

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September 17, 2013

VIA HAND DELIVERY

Ms. Gail Mount North Carolina Utilities Commission 430 N. Salisbury Street '5th Floor – Clerk's Office Raleigh, North Carolina 27699-4325

> Petition to Intervene of Nucor Steel - Hertford Re: Docket No. E-100, Sub 137 Our File: 19128/00001

Dear Ms. Mount:

Enclosed for filing on behalf of Nucor Steel-Hertford ("Nucor") are an original and twenty-five (25) copies of a Petition to Intervene relating to the above-referenced matter.

Also enclosed is an additional copy of the document to be stamped as "filed" and returned to us via our courier.

Thank you for your assistance in this matter. With best regards, I am

Very truly yours,

Phillip a Vanich

Phillip A. Harris, Jr.

PAH:wbg Enclosures

(51. AG 7-comm Watson Green Connad Duffling Hoover Sessome Kitu Hilburn Grican Jones Hodge Ayens 3-ps Legel 3-ps Accta 2-ps Ec/Ris 3- ps Elect.

With offices in the District of Columbia, Florida, Georgia, Massachusetts, North Carolina, South Carolina, Tennessee and West Virginia

STATE OF NORTH CAROLINA UTILITIES COMMISSION RALEIGH

FILED SEP 17 2013 N.C. Utilities Commission

DOCKET NO. E-100, Sub 137

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

)

INTEGRATED RESOURCE PLAN OF DOMINION NORTH CAROLINA POWER FOR 2013 PETITION TO INTERVENE OF NUCOR STEEL - HERTFORD

Pursuant to Rule 1-7 and Rule R1-19 of the Rules and Regulations of the North Carolina Utilities Commission, Nucor Steel-Hertford, a division of Nucor Corporation, hereby moves to intervene in the above-captioned proceeding. In support of its petition, Nucor states:

1. On August 30, 2013, Dominion North Carolina Power filed its Integrated Resource Plan for 2013.

2. Nucor is a corporation organized pursuant to the laws of the State of Delaware with its corporate headquarters located at 2100 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. Virginia Electric and Power Company does business in North Carolina as Dominion North Carolina Power (hereinafter "DNCP"). Nucor is a customer of DNCP 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 DNCP, 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 Phillip A. Harris, Jr. Nelson, Mullins, Riley & Scarborough, LLP 4140 Parklake Avenue, GlenLake One, Suite 200 (27612) Post Office Box 30519 Raleigh, NC 27622-0519 Telephone: (919) 877-3807 Facsimile: (919) 877-3140 joe.eason@nelsonmullins.com chris.blake@nelsonmullins.com

And to:

Damon E. Xenopoulos* Brickfield, Burchette, Ritts & Stone, P.C. 1025 Thomas Jefferson St., N.W. 8th Floor, West Tower Washington, D.C. 20007 Telephone: (202) 342-0800 Facsimile: (202) 342-0807 dex@bbrslaw.com

*Of Counsel, Notice Purposes Only

WHEREFORE, Nucor respectfully requests that the commission allow it to

intervene in this proceeding, and become a party thereto for all purposes.

Respectfully submitted, this $\frac{17}{12}$ day of September, 2013.

lip a. Harriof By:

Joseph W. Eason, Esq. Christopher J. Blake, Esq. Phillip A. Harris, Jr. Esq. Nelson, Mullins, Riley & Scarborough, LLP 4140 Parklake Ave., GlenLake One, Suite 200 Post Office Box 30519 Raleigh, NC 27622-0519 joe.eason@nelsonmullins.com chris.blake@nelsonmullins.com phillip.harris@nelsonmullins.com

Of Counsel

Damon E. Xenopoulos, Esq. Brickfield, Burchette, Ritts & Stone, P.C. 1025 Thomas Jefferson St., N.W. 8th Floor, West Tower Washington, D.C. 20007 Phone: (202) 342-0800 Facsimile: (202) 342-0807 dex@bbrslaw.com

Attorneys for Nucor Steel-Hertford

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VERIFICATION

Phillip A. Harris, Jr., 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.

 17^{+}_{day} of September, 2013. This

Phillip A. Harris, Jr.

North Carolina

Wake County

Sworn to and subscribed before me

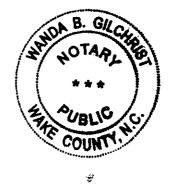
This 17 day of <u>September</u>, 2013. Sanda B. Vilchrist

Notary Public

 \mathbb{R}

Print Notary Public Name

My Commission Expires: 7-24-2018



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 as follows:

Lisa S. Booth Horace P. Payne, Jr. 120 Tredegar Street, RS-2 Richmond, VA 23219 lisa.s.booth@dom.com Horace.p.payne@dom.com E. Brett Breitschwerdt McGuire Woods LLP One James Center 901 East Cary Street Richmond, VA 23219 mgrigg@mcguirewoods.com bbreitschwerdt@mcguirewoods.com

This the 17^{+} day of September, 2013.

Phillip A. Harris, Jr.