

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Commission Review of Numeric
Conservation Goals (Duke Energy Florida, LLC)

DOCKET NO.: 20240013-EG
FILED: April 9, 2024

**PETITION TO INTERVENE OF
NUCOR STEEL FLORIDA, INC.**

Pursuant to Sections 120.569 and 120.57, Florida Statutes and Rule 28-106.205, Florida Administrative Code, Nucor Steel Florida, Inc. (“Nucor”), through its undersigned attorneys, files its Petition to Intervene in the above captioned proceeding. In support thereof, Nucor states as follows:

1. The name and address of the affected agency is:

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

2. The name and address of the petitioner is:

Nucor Steel Florida, Inc.
22 Nucor Drive
Frostproof, FL 33843

3. All pleadings, motions, orders, and other documents directed to the petitioner

should be served on:

Peter J. Mattheis
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4. Statement of Affected Interests. Nucor owns and operates a steel production facility located within Duke Energy Florida's ("DEF") electric service territory. Nucor purchases large amounts of electric energy from DEF to power its steel making operations.

5. On April 2, 2024, DEF filed a Petition for approval of its proposed conservation goals for the period 2025-2034 ("Petition"). Pursuant to Section 366.82, Florida Statutes, this case will review DEF's goals to increase the efficiency of energy consumption, increase the development of demand-side renewable energy systems, reduce and control the growth rates of electric consumption and weather-sensitive peak demand, and encourage the development of demand-side renewable energy resources. The decisions in this case may affect the costs that are collected from electric service customers like Nucor. Given that changes proposed in the Petition may affect the rates charged and paid by DEF customers, and because Nucor purchases substantial amounts of electric energy from DEF, the outcome of this proceeding may adversely affect Nucor's interests.

6. Disputed Issues of Material Fact. Nucor is not aware of any disputed issues of material fact at this early stage of the proceeding. However, Nucor anticipates that disputed issues of material fact may be identified over the course of the proceeding, and Nucor reserves the right to identify such issues.

7. Disputed Legal Issues. Nucor is not aware of any disputed legal issues at this early stage of the proceeding. However, Nucor anticipates that disputed legal issues may be identified over the course of the proceeding, and Nucor reserves the right to identify such issues.
8. Statement of Ultimate Facts Alleged. Alleged ultimate facts include, but are not limited to, whether the proposed rate and relief request by DEF are just and reasonable. Nucor anticipates additional alleged ultimate facts may be identified over the course of the proceeding.
9. Laws Entitling Petitioner to Relief and Relation to Alleged Facts. The rules and statutes entitling Nucor to relief include but are not necessarily limited to the following: Sections 120.569 and 120.57(1), Florida Statutes, Sections 366.04 through 366.07, Florida Statutes, and Rule 28-106.205, Florida Administrative Code.
10. Statement of Conferral. In accordance with Rule 28-106.204(3), Florida Administrative Code, Nucor has conferred with all parties to this proceeding regarding Nucor's intervention. Florida Industrial Power Users Group supports Nucor's intervention; DEF, LULAC and Florida Rising, PCS Phosphate—White Springs, and OPC take no position on Nucor's intervention. As such, no party indicated an objection to Nucor's intervention.
11. Relief. Nucor requests that it be permitted to intervene as a full party in this docket.

WHEREFORE, Nucor respectfully requests that the Commission enter an order allowing it to intervene as a full party in this docket.

Respectfully Submitted,

/s/ Michael K. Lavanga

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Certificate of Service

I hereby certify that a true copy of the foregoing Petition to Intervene has been furnished by electronic mail and/or U.S. Mail this 9th day of April, 2024, to the following:

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