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DOCKET NO. 34077

JOINT REPORT AND APPLICATION §
OF ONCOR ELECTRIC DELIVERY §
COMPANY AND TEXAS ENERGY §
FUTURE HOLDINGS LIMITED §
PARTNERSHIP PURSUANT TO §
PURA § 14.101 §

BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

MOTION TO INTERVENE OF NUCOR STEEL - TEXAS

Nucor Steel – Texas (“Nucor”), a division of Nucor Corporation, pursuant to sections 22.102, 22.103(b) and 22.104 of the Procedural Rules of the Public Utility Commission of Texas (“Commission”), hereby moves to intervene in the above-captioned proceeding. Nucor states the following as grounds for its Motion:

1. The name, address and telephone number of Nucor are as follows:

Nucor Steel - Texas
P.O. Box 126
Jewett, Texas 75846
(903) 626-4461

2. The names, addresses and telephone numbers of Nucor’s authorized representatives are as follows:

Stephen J. Karina
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, NW
8th Floor, West Tower
Washington, DC 20007
(202) 342-0800
(202) 342-0807 - Fax
E-mail: skarina@bbrslaw.com

and

Nelson H. Nease
Brickfield Burchette Ritts & Stone, P.C.
1005 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 472-1081
(512) 472-7473 - Fax
Email: nnease@bbrsaustin.com

Nucor requests that the Commission and all parties to this proceeding serve copies of all notices, correspondence, pleadings, briefs, requests for information, and other documents upon Nucor's representatives at the Austin address shown above.

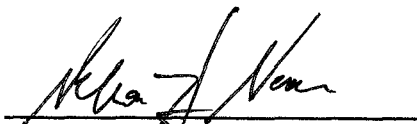
3. On April 3, 2007, the present docket was initiated upon receipt of correspondence from Kohlberg, Kravis, Roberts & Co. and Texas Pacific Group providing the Commission with "the legally binding stipulation and agreement of Texas Energy Future Holdings Limited Partnership ('TEF') that TEF would take a series of actions with respect to TXU Electric Delivery Company upon consummation of the proposed merger transaction discussed in the correspondence.¹ On April 25, 2007, Oncor Electric Delivery Company ("Oncor") (formerly TXU Electric Delivery Company) and TEF filed a *Joint Report and Application* pursuant to PURA Section 14.101 and P.U.C. SUBST. R. 25.75. The Application requests, *inter alia*, that the Commission make a timely determination that the transaction described in the *Joint Report and Application* is consistent with the standards set out in PURA Section 14.101. Those standards include a determination that the transaction is consistent with the public interest.

4. Nucor has standing to intervene in this proceeding under Section 22.103(b)(2) of the Commission's Procedural Rules. Nucor owns and operates a steelmaking facility in Jewett, Texas, and is a large transmission/distribution customer of Oncor. As one of Oncor's largest customers, Nucor has a justiciable interest that may be adversely affected by the outcome of this proceeding.

WHEREFORE, for the reasons set forth above, Nucor Steel-Texas respectfully requests that its Motion to Intervene be granted and that Nucor be allowed to fully

participate in all aspects of this proceeding. Nucor further requests any other and further relief to which it may be justly entitled.

Respectfully submitted,



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**AUTHORIZED REPRESENTATIVES FOR
NUCOR STEEL-TEXAS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was hand delivered and/or mailed this 8th day of May, 2007 by First Class, U.S. Mail, postage pre-paid to all parties of record.


Nelson H. Nease

¹ TEF Letter to Public Utility Commission of Texas, April 2, 2007 at 1 (Item No. 1 in present docket).