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**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

Docket Nos. UE-240004 and UG-240005

**PETITION FOR LEAVE TO  
INTERVENE OF WALMART, INC.**

1. Pursuant to WAC § 480-07-355, Walmart, Inc. (“Walmart”) hereby petitions the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) for leave to intervene in the above-referenced docket as intervenors with full party status, as described in WAC § 480-07-340. The business address of Walmart is:

Walmart Stores, Inc.  
2608 Southeast J Street  
Bentonville, Arkansas 72716-0550

2. Walmart will be represented in this proceeding by Parsons Behle & Latimer. All documents relating to this proceeding should be served on Walmart’s attorney and business representatives at the following addresses:

Justina A. Caviglia  
Parsons Behle & Latimer  
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3. The administrative rules at issue are WAC § 480-07-340, -355.

4. As shown on Walmart’s website, Walmart operates 64 retail units, two distribution centers, and employs over 23,000 associates in Washington. In fiscal year ending 2023, Walmart purchased \$2.8 billion worth of goods and services from Washington-based suppliers, supporting over 34,000 jobs.<sup>1</sup> Walmart is a large retail customer of Puget Sound Energy (“PSE”), owning and operating 29 stores in PSE’s Washington service territory. Collectively, these facilities consume over 54.2 million kWh on an annual basis, primarily on the Large General Service rate class.

5. Walmart has a direct, immediate, and substantial interest in PSE’s proposed new rates and this proceeding as a customer of PSE. The interests of Walmart will not be adequately represented by any other party to this proceeding.

6. The rates Walmart pays for electric service from PSE in Washington will be affected by a Commission decision in this proceeding.

7. Walmart has not yet determined the extent of its participation or the precise nature of the relief it will request but anticipates participating in this matter to the extent necessary to ensure its interests in Washington are protected. The interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of Walmart’s Petition to Intervene.

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<sup>1</sup> <https://corporate.walmart.com/about/washington>

Neither will Walmart's participation unnecessarily broaden the issues or burden the record in this proceeding. Thus, it is in the public interest to allow Walmart to intervene in this proceeding.

8. WHEREFORE, Walmart respectfully requests that the Commission enter an Order granting Walmart permission to intervene in this docket and to participate to the full extent allowed by the law so that it may appropriately represent its interests as circumstances warrant in this proceeding.

DATED this 5th day of March, 2024.

PARSONS BEHLE & LATIMER

/s/ Justina A. Caviglia

JUSTINA A. CAVIGLIA

WSBA No. 52402

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jcaviglia@parsonsbehle.com

*Attorneys for Walmart, Inc.*

**CERTIFICATE OF SERVICE**

Docket Nos. UE-240004 and UG-240005

I hereby certify that on this 5th day of March, 2024, I caused a true and correct copy of the foregoing document, **PETITION FOR LEAVE TO INTERVENE OF WALMART, INC.**, to be served via electronic mail, to the following:

<p><u>Puget Sound Energy</u></p> <p>Sheree Strom Carson David S. Steele Donna L. Barnett Perkins Coie, LLP 10885 N.E. Fourth St., Suite 700 Bellevue, WA 98004-5579 scarson@perkinscoie.com dsteele@perkinscoie.com dbarnett@perkinscoie.com</p> <p>Birud D. Jhaveri Director – Regulatory Affairs Puget Sound Energy P.O. Box 97034, EST-07W Bellevue, WA 98009-9734 Birud.Jhaveri@pse.com</p>	<p><u>Staff</u></p> <p>Nash Callaghan Cassandra Jones Lisa Gafken Liam Weiland Colin O'Brien Assistant Attorney General PO Box 40128 Olympia, WA 98504 nash.callaghan@atg.wa.gov cassandra.jones@atg.wa.gov Lisa.Gafken@atg.wa.gov liam.weiland@atg.wa.gov colin.obrien@atg.wa.gov</p>	<p><u>Public Counsel</u></p> <p>Tad Guy O'Neill Corey Dahl Stephanie Chase Roman Doyonnas Brice C. Hartman Office of the Attorney General 800 Fifth Avenue STE 2000 Seattle, WA 98104-3188 Tad.Oneill@atg.wa.gov Roman.Doyonnas@atg.wa.gov Brice.Hartman@atg.wa.gov Corey.Dahl@atg.wa.gov Stephanie.Chase@atg.wa.gov PCCSeaEF@atg.wa.gov</p>
<p><u>Alliance of Western Energy Consumers</u></p> <p>Tyler Pepple Sommer J. Moser Davison Van Cleve, PC 1750 SW Harbor Way STE 450 Portland, OR 97201 tcp@dvclaw.com lance@westernecon.com brmullins@mwanalytics.com sjm@dvclaw.com jog@dvclaw.com</p>	<p><u>The Energy Project</u></p> <p>Yochanan Zakai Sara L. Breckenridge SHUTE, MIHALY &amp; WEINBERGER LLP 396 Hayes Street, San Francisco, California 94102 (415) 552-7272 yzakai@smwlaw.com breckenridge@smwlaw.com</p>	

/s/ Roni L. Shaffer  
Employee of Parsons Behle & Latimer