

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	
	)	
Complainant,	)	DOCKET NO. UE - 100749
	)	
vs.	)	PETITION TO INTERVENE OF
	)	WALMART STORES, INC. AND
PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY,	)	SAM'S WEST, INC.
	)	
Respondent.	)	
	)	

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**PETITION FOR LEAVE TO INTERVENE OF  
WAL-MART STORES, INC. AND SAM'S WEST, INC.**

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Wal-Mart Stores, Inc. and Sam's West, Inc. (collectively, "Walmart"), by and through its undersigned counsel and pursuant to WAC §480-07-355, herewith petitions the Washington Utilities and Transportation Commission ("Commission") for leave to intervene in the above-captioned proceeding as an intervenor with full party status as described in WAC §480-07-340. In support of this petition, Walmart states as follows:

1. Walmart's business address is:

2001 SE 10<sup>th</sup> Street  
Energy Management Department #9638  
Bentonville, Arkansas 72716-0550  
Phone: (479) 204-1594

2. Walmart will be represented in this matter by Judith Kim, Assistant General Counsel, Wal-Mart Stores, Inc. All communications relating to this proceeding should be served on the following persons:

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2001 SE 10<sup>th</sup> Street  
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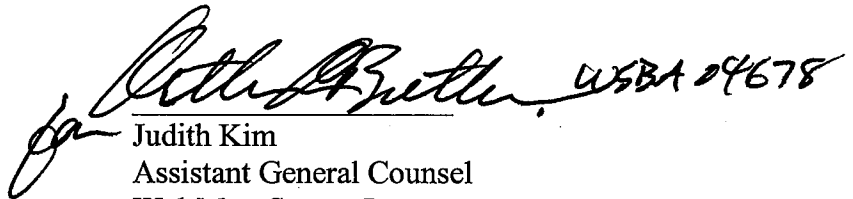
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3. Walmart is a large retailer with four facilities in the service territory of Pacific Power & Light Company ("Pacific Power"). These facilities include Walmart Supercenters and one Distribution Center. Collectively, these facilities subscribe to Pacific Power Rate Schedules LGS, GNS and LNX. A significant percentage of the electrical capacity and energy that Walmart requires to power its Washington state facilities is purchased from Pacific Power. Walmart's facilities in Pacific Power's Washington state territory use approximately 32,000,000 kWh/year.
4. Walmart is a unique large commercial customer of Pacific Power. Changes in the rates of Pacific Power will have a significant impact on the actual bills charged to Walmart for the energy it purchases. Thus, this matter has the potential to dramatically impact Walmart's cost of energy for its Washington operations. Energy costs comprise a large portion of Walmart's operating costs. As a result, this docket may substantially affect the pecuniary or tangible interest of Walmart. Walmart seeks to intervene in this docket to protect these interests.
5. Walmart offers this process considerable expertise in the areas of rate design structure and economic and policy analysis. Walmart has participated in numerous rate case and fuel adjustment proceedings in many states across the country.
6. Walmart will not unreasonably broaden the issues, burden the record or delay the proceeding through its intervention.
7. As described above, Walmart has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with this proceeding. It is in the public interest to allow Walmart to intervene in this proceeding.

For the foregoing reasons, Walmart requests the Commission to grant its motion to intervene in this matter.

DATED this 27<sup>th</sup> day of May, 2010.

**Wal-Mart Stores, Inc. & Sam's West, Inc.**

 *J. Kim* USBA 04678

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Licensed in Georgia & New York

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have on this 27th day of May, 2010, I caused the foregoing Petition to Intervene of Wal-Mart Stores, Inc. and Sam's West, Inc. to be filed, and thereby to be served.

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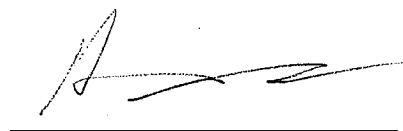
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