

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

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

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

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:

Judith Kim  
2001 SE 10<sup>th</sup> Street  
Walmart U.S. Legal, Department #8989  
Bentonville, Arkansas 72716-0550  
Phone: (479) 204-2527  
Fax: (479) 277-5991  
Email: [Judith.kim@walmartlegal.com](mailto:Judith.kim@walmartlegal.com)

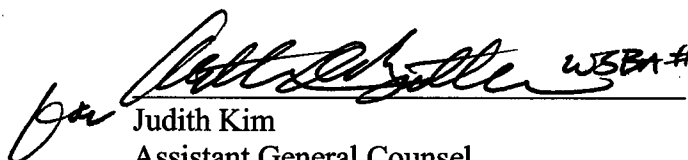
***Stephen*** Chriss  
Manager—State Rate Proceedings  
200 S.E. 10<sup>th</sup> Street  
Energy Management Department #9638  
Bentonville, Arkansas 72716-0550  
Fax: (479) 273-6851  
Email: [Stephen.chriss@wal-mart.com](mailto:Stephen.chriss@wal-mart.com)

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 1st<sup>h</sup> day of June, 2010.

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

*for*  *WSBA # 04678*

Judith Kim  
Assistant General Counsel  
Wal-Mart Stores, Inc.  
2001 SE 10<sup>th</sup> Street  
Bentonville, AR 72706-0550  
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[Judith.kim@walmartlegal.com](mailto:Judith.kim@walmartlegal.com)

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## CERTIFICATE OF SERVICE

I hereby certify that I have this 1st day of June, 2010, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

David S. Danner	<input type="checkbox"/>	Hand Delivered
Secretary and Executive Director	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Washington Utilities and Transportation	<input type="checkbox"/>	Overnight Mail (UPS)
Commission	<input type="checkbox"/>	Facsimile (360) 586-8203
1300 S Evergreen Park Drive SW	<input type="checkbox"/>	Email ( <a href="mailto:records@wutc.wa.gov">records@wutc.wa.gov</a> ) – via e-
PO Box 47250	<input checked="" type="checkbox"/>	file
Olympia, WA 98504-7250		

I hereby certify that I have this 1st day of June, 2010, served a true and correct copy of the foregoing document upon parties of record, via the method(s) noted below, properly addressed as follows:

***On Behalf Of RCI:***

Donald W. Schoenbeck	<input type="checkbox"/>	Hand Delivered
Regulatory & Cogeneration Services, Inc.	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
900 Washington Street, Suite 780	<input type="checkbox"/>	Overnight Mail (UPS)
Vancouver Wa 98660-3455	<input type="checkbox"/>	Facsimile (360) 737-7628
<i>Confidentiality Status:</i>	<input type="checkbox"/>	Email ( <a href="mailto:dws@r-c-s-inc.com">dws@r-c-s-inc.com</a> )

***On Behalf Of :***

Katherine A. McDowell	<input type="checkbox"/>	Hand Delivered
McDowell, Rackner & Gibson PC	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Suite 830	<input type="checkbox"/>	Overnight Mail (UPS)
520 SW Sixth Avenue	<input type="checkbox"/>	Facsimile (503) 595-3928
Portland OR 97204	<input type="checkbox"/>	Email ( <a href="mailto:katherine@mcd-law.com">katherine@mcd-law.com</a> )
<i>Confidentiality Status:</i>		

***On Behalf Of Industrial Customers of Northwest Utilities:***

Irioin Sanger	<input type="checkbox"/>	Hand Delivered
Davison Van Cleve PC	<input checked="" type="checkbox"/>	U.S. Mail (first-class, postage prepaid)
Suite 400	<input type="checkbox"/>	Overnight Mail (UPS)
333 SW Taylor	<input type="checkbox"/>	Facsimile (503) 241-8160
Portland OR 97204	<input type="checkbox"/>	Email ( <a href="mailto:ias@dvclaw.com">ias@dvclaw.com</a> )
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**On Behalf Of Staff:**

Sarah Shifley  
Attorney General of Washington  
Suite 2000  
800 Fifth Avenue  
Seattle WA 98104-3188

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 Email (sarah.shifley@atg.wa.gov)

**On Behalf Of :**

Donald Trotter  
State of Washington  
1400 S. Evergreen Park Drive SW  
PO Box 40128  
Olympia WA 98504-0128

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**On Behalf Of PacifiCorp:**

Cathie Allen  
PacifiCorp d/b/a Pacific Power and Light  
Company  
825 NE Multnomah, Suite 2000  
Portland OR 97232

*Confidentiality Status:*

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**On Behalf Of PacifiCorp:**

Michelle Mishoe  
PacifiCorp d/b/a Pacific Power & Light  
Company  
825 NE Multnomah, Suite 1800  
Portland OR 97232

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 Facsimile  
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**On Behalf Of Industrial Customers of Northwest  
Utilities:**

Melinda J. Davidson  
Davidson Van Cleve, PC  
333 S.W. Taylor, Suite 400  
Portland OR 97204

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***On Behalf Of RFI:***

Randall J. Falkenberg  
RFI Consulting, Inc.  
8343 Roswell Road, PMB 362  
Sandy Springs GA 30350

*Confidentiality Status:*

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 Overnight Mail (UPS)  
 Facsimile  
 Email

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 1st day of June, 2010, at Seattle, Washington.

  
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