BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Docket No. UE-191024

Complainant,

v.

PACIFIC POWER & LIGHT COMPANY,

PETITION FOR LEAVE TO INTERVENE OF WALMART, INC.

Respondent

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 72712-0550

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:

Vicki M. Baldwin
Parsons Behle & Latimer
201 South Main Street, Suite 1800
Salt Lake City, Utah 84111
vbaldwin@parsonsbehle.com
Telephone: (801) 532-1234
Facsimile: (801-536-6111

Alex Kronauer
Senior Manager, Energy Services
Walmart Stores, Inc.
2608 Southeast J Street
Bentonville, Arkansas 72712-0550
Alex.Kronauer@walmart.com
(479) 204-7993

- 3. The administrative rules at issue are WAC § 480-07-340, -355.
- 4. Walmart is a large retailer with 66 retail units in Washington with over 20,000 associates. Five (5) of those facilities take service from Pacific Power & Light Co. ("PPL").
- 5. Walmart has a direct, immediate, and substantial interest in PPL's proposed new rates and this proceeding as a customer of PPL. The interests of Walmart will not be adequately represented by any other party to this proceeding.
- 6. The rate Walmart pays for electric service from PPL 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. 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 21st day of January 2020.

/s/ Vicki M. Baldwin

Vicki M. Baldwin PARSONS BEHLE & LATIMER 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 vbaldwin@parsonsbehle.com Attorneys for Walmart, Inc.

CERTIFICATE OF SERVICE

Docket No. UE-191024

I hereby certify that on this 21st day of January 2020, I caused to be served, a true

and correct copy of the foregoing PETITION FOR LEAVE TO INTERVENE OF

WALMART, INC., via electronic mail, to:

Pacific Power & Light Co. Etta P. Lockey Vice President, Regulation 825NE Multnomah Street, Suite 2000 Portland, OR 97232 etta.lockey@pacificorp.com

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/s/ Hailey Arvidson