BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PUGET SOUND ENERGY,

Respondent

Docket No. UE-161123

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

1. Pursuant to WAC § 480-07-355, Wal-Mart Stores, Inc. and Sam's West, Inc.

(collectively "Walmart") hereby petition 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:

Wal-Mart Stores, Inc. 2001 SE Tenth 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 representative at the following addresses:

Vicki M. Baldwin Parsons Behle & Latimer 201 South Main Street, Suite 1800 Salt Lake City, Utah 84111 <u>vbaldwin@parsonsbehle.com</u> Telephone: (801) 532-1234 Facsimile: (801-536-6111 Steve W. Chriss Director, Energy and Strategy Analysis Walmart Stores, Inc. 2001 SE Tenth Street Bentonville, Arkanses 72716-0550 <u>Stephen.Chriss@walmart.com</u> Telephone: (479) 204-1594

3. The administrative rules at issue are WAC § 480-340, -355.

4. Walmart is a large retailer with 71 facilities in Washington with over 20,000 associates. Twenty-two of those facilities take service from Puget Sound Energy ("PSE").

5. Walmart has a direct, immediate, and substantial interest in PSE's proposed new electric Schedule No. 451 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 rate Walmart pays for electric service from PSE in Washington and its ability to take full advantage of PSE's proposed new retail wheeling service may 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. Walmart just learned of the existence of this docket today, November 4. However, no proceedings have yet been conducted so Walmart's intervention should not impair the prompt conduct of 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

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by the law so that it may appropriately represent its interests as circumstances warrant in this proceeding.

DATED this 7th day of November, 2016.

/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 Stores, Inc.

CERTIFICATE OF SERVICE

Docket No. UE-161123

I hereby certify that on this 7th day of November 2016, I caused to be served, a true

and correct copy of the foregoing **CORRECTED PETITION FOR LEAVE TO INTERVENE**

OF WALMART STORES INC. AND SAM'S WEST, INC., via electronic mail and by First

Class U.S. Mail, postage prepaid, to:

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