

**BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of	)	DOCKET NO. UE-141368
	)	
PUGET SOUND ENERGY	)	
	)	PETITION TO INTERVENE
	)	OF WAL-MART STORES, INC.
To Update Methodologies Used to	)	
Allocate Electric Cost of Service and	)	
For Electric Rate Design Purposes	)	
_____	)	

1. Pursuant to WAC § 480-07-355, Wal-Mart Stores, Inc, (“Walmart”), by its attorneys, respectfully petitions the Washington Utilities and Transportation Commission (“Commission”) for leave to intervene in the above-referenced docket as an intervenor with full party status as described in WAC § 480-07-340.

2. The business address of Walmart is:

Wal-Mart Stores, Inc.  
2001 SE 10th Street  
Bentonville, AR 72716

3. Walmart will be represented in this proceeding by Samuel L. Roberts and Hutchinson, Cox, Coons, Orr & Sherlock, P.C. Walmart requests that all documents in this proceeding be served on its counsel and representatives at the following address:

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//

Samuel L. Roberts  
Hutchinson, Cox, Coons, Orr & Sherlock, P.C.  
PO Box 10886  
Eugene, OR 97440  
sroberts@eugenelaw.com

Steve W. Chriss  
Wal-Mart Stores, Inc.  
2001 SE 10th Street  
Bentonville, AR 72716  
stephen.chriss@wal-mart.com

4. Walmart is a national retailer of goods and services throughout the United States. Walmart has the privilege of providing its retail services in the State of Washington. Walmart employs approximately 19,350 associates in Washington, and purchases goods and services locally worth approximately \$2.6 billion from Washington suppliers. Walmart is a large customer of Puget Sound Energy (“PSE”).

5. Walmart has a substantial interest in the outcome of this proceeding. Walmart has approximately twenty-three facilities, including retail stores and gas stations, in PSE’s service territory. As a result, the legal rights and interests of Walmart may be substantially impacted by this proceeding.

6. Walmart has begun to review and analyze PSE’s filing; however, it has not yet developed a precise statement of the specific action sought or a factual and legal basis for such positions. Without limiting Walmart’s request for full intervenor status or waiving any rights to address other issues raised by the parties or the Commission, Walmart can state that its focus at the time of filing this petition will be cost of service and rate design.

7. Walmart intends to play a constructive role in the Commission’s decision making process. As a large customer, Walmart can add a unique prospective to this proceeding. Walmart participates in more than forty general and other rate-related cases across the nation each year. As a result, Walmart can meaningfully contribute to this proceeding, and such participation will not broaden the issues, burden the record, or delay this proceeding.

8. **WHEREFORE**, for all the reasons stated above, Walmart respectfully requests that the Commission grant its Petition to Intervene with full party status in this proceeding.

DATED: August 8, 2014

HUTCHINSON, COX, COONS,  
ORR & SHERLOCK, P.C.

A handwritten signature in black ink, appearing to read 'S. Roberts', written over a horizontal line.

Samuel L. Roberts  
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*Of Attorneys for Wal-Mart Stores, Inc.*

## CERTIFICATE OF SERVICE

Docket UE-141368

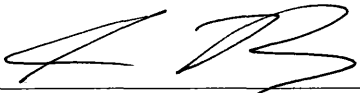
I hereby certify that I have this day served the foregoing *Petition to Intervene* of Wal-Mart Stores, Inc. upon all parties of record in this proceeding, shown below, by causing the same to be mailed, postage-prepaid, through US Mail and E-Mail.

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DATED this 8th day of August, 2014.

HUTCHINSON, COX, COONS,  
ORR & SHERLOCK, P.C.

By:   
\_\_\_\_\_  
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