## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

**PUGET SOUND ENERGY,** 

## Respondent

Docket No. UE-160977

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

1. Pursuant to WAC § 480-07-355, Walmart 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:

Walmart 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

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Telephone: (801) 532-1234 Facsimile: (801-536-6111 Steve W. Chriss
Senior Manager, Energy Regulatory Analysis
Walmart Stores, Inc.
2001 SE Tenth Street
Bentonville, Arkanses 72716-0550
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- 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. Thirty-four 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. 139 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. Reducing energy use and using renewable energy is a core element of the business and sustainability strategies of Walmart. The rate Walmart pays for electric service from PSE in Washington and its ability to take full advantage of PSE's proposed Schedule No. 139 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. 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 14th day of September, 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-160977

I hereby certify that on this 14th day of September 2016, I caused to be served, a true and correct copy of the foregoing **PETITION FOR LEAVE TO INTERVENE OF WALMART STORES INC.**, via electronic mail and by First Class U.S. Mail, postage prepaid,

to:

Ken Johnson Director – Rates & Regulatory Affairs Puget Sound Energy P.O. Box 97034, PSE-08N Bellevue, WA 98009-9734 ken.s.johnson@pse.com Sheree Carson Perkins Coie, LLP 10885 N.E. Fourth St. Bellevue, WA 98004-5579 scarson@perkinscoie.com Jennifer Cameron-Rulkowski Assistant Attorney General WUTC P.O. Box 40128 Olympia, WA 98504-0128 jcameron@utc.wa.gov

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/s/ Chermaine Gord