
BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Voluntary Renewable Energy Tariffs for
Non-Residential Customers

Docket No. UM-1690

**PETITION TO INTERVENE OF
WALMART STORES, INC. AND SAM'S
WEST, INC.**

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Wal-Mart Stores, Inc. and Sam's West, Inc. (collectively "Walmart") hereby petition the Public Utility Commission of Oregon ("Commission") for leave to intervene in the above-referenced docket as intervenors to appear and participate as a party with full party status. The grounds therefore are as follows:

1. The name and address of this Intervenor is:

Wal-Mart Stores, Inc.
Attn: Steve W. Chriss
Director, Energy and Strategy Analysis
2001 SE Tenth Street
Bentonville, Arkansas 72716-0550
Stephen.Chriss@walmart.com
Telephone: (479) 204-1594

2. Walmart will be represented in this proceeding by its attorney:

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

3. Please include Mr. Chriss and Ms. Baldwin on the service list for this matter.
4. Walmart is seeking intervention on its own behalf as a customer of Portland General Electric Company (“PGE”). Petitioner is not seeking intervention in this matter as a member of a trade group or other organization.
5. Walmart is a large retailer with 44 facilities in Oregon with over 11,900 associates. Nineteen of those facilities take service from PGE.
6. Walmart has a direct, immediate, diverse and substantial interest in the outcome of this case and the interests of Walmart will not be adequately represented by any other party to this proceeding. The ability of Walmart to participate in a PGE renewable energy tariff 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 Oregon are protected.
8. 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.
9. 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 10th day of May, 2018.

/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. and
Sam's West, Inc.*

CERTIFICATE OF SERVICE

Docket No. UM 1690

I hereby certify that on this 10th day of May, 2018, I caused to be served, a true and correct copy of the foregoing **PETITION TO INTERVENE OF WALMART STORES, INC. AND SAM'S WEST, INC.**, via electronic mail, to:

OREGON CITIZENS UTILITY BOARD

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/s/ Lexi Deal