## BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of PORTLAND GENERAL ELECTRIC COMPANY'S Request for a General Rate Revision

Docket No. UE-319

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

Pursuant to ORS 756.525 and OAR 860-001-0300(2), Walmart 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:

Walmart Stores, Inc. Attn: Steve W. Chriss Director, Energy and Strategy Analysis 2001 SE Tenth Street Bentonville, Arkansas 72716-0550 <u>Stephen.Chriss@walmart.com</u> 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 <u>vbaldwin@parsonsbehle.com</u> 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 rate Walmart pays for electric service from PGE in Oregon 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. Walmart's interests include ensuring that the rate increase sought by PGE is reasonable and cost justified and that the proposed allocation and design of any new rates are just and reasonable.

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.

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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 3rd day of April, 2017.

/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. UE 319

I hereby certify that on this 3rd day of April 2017, 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:

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/s/\_\_Chermaine Gord