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May 28, 2013

Public Utility Commission

Attn: Filing Center

PO Box 2148

Salem, OR 97308

Re: In the Matter of PacifiCorp, dba Pacific Power
Request for a General Rate Revision – UE 263
Our File No.: 10935/C1385B

Dear Filing Center:

Enclosed for filing in the above-referenced docket are the original and one copy of Wal-Mart Stores, Inc.'s Petition to Intervene in UE 263.

A copy of this filing has been served on all parties to this proceeding as indicated on the enclosed certificate of service.

Very truly yours,

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

Samuel L. Roberts

SLR/nb
Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 263

In the Matter of PACIFICORP, dba)	
PACIFIC POWER,)	
)	PETITION TO INTERVENE
Request for a General Rate Revision.)	OF WAL-MART STORES, INC
)	
)	
)	
)	

Pursuant to ORS §756.525 and OAR §860-001-0300, Wal-Mart Stores, Inc, (“Walmart”), by its attorneys, respectfully petitions the Public Utility Commission of Oregon (“Commission”) for full intervenor status in the above-captioned proceeding and states in support thereof:

1. The business address of Walmart is:

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

2. 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 witness at the following address:

Samuel L. Roberts
Hutchinson, Cox, Coons, Orr & Sherlock, P.C.
PO Box 10886
Eugene, OR 97440
sroberts@eugenelaw.com
(541) 686-9160

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

3. 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 Oregon. Walmart employs approximately 10,000 associates in Oregon, and purchases goods and services locally

worth approximately \$464 million from Oregon suppliers. Walmart is a large customer of PacifiCorp, dba Pacific Power (“Pacific Power”).

4. Walmart has a substantial interest in the outcome of this proceeding. Walmart has approximately fifteen (15) facilities, including discount stores and Supercenters, in Pacific Power’s service territory. Walmart’s costs are affected by Pacific Power’s rate structure and the rate increase requested by Pacific Power, if approved, would result in significant added cost to Walmart. As a result, this proceeding may substantially impact the legal rights and interests of Walmart.

5. Walmart has begun to review and analyze Pacific Power’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 is on rate design and cost of service issues raised in this proceeding.

6. 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 twenty rate cases across the nation each year. Walmart’s case manager has personally testified in over 70 rate cases and other rate-related dockets before 32 state utility regulatory commissions. As a result, Walmart can meaningfully contribute to this proceeding, and such participation should not impose any burden on the Commission or parties or otherwise delay this proceeding.

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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: May 28, 2013

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

/S/ Samuel L. Roberts

Samuel L. Roberts

OSB No. 115034

PO Box 10886

Eugene, OR 97440

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(541) 686-9160

(541) 343-8693 (Fax)

Of Attorneys for Wal-Mart Stores, Inc.

CERTIFICATE OF SERVICE
OPUC Docket No. UE 263

I hereby certify that I caused to be served the foregoing Petition to Intervene via electronic mail and, where paper service is not waived, via postage-paid First Class Mail upon the following parties of record:

<p>Kurt J. Boehm Boehm Kurt & Lowry 36 E. Seventh St – STE 1510 Cincinnati, OH 45202 kboehm@bkllawfirm.com</p>	<p>Jody Kyler Cohn Boehm Kurt & Lowry 36 E. Seventh St – STE 1510 Cincinnati, OH 45202 jkyler@bkllawfirm.com</p>
<p>Michael Gorman Brubaker & Associates, Inc. 16690 Swingley Ridge Rd, Ste. 140 Chesterfield, MO 63017 mgorman@consultbai.com</p>	<p>Citizens' Utility Board of Oregon 610 SW Broadway, Ste 400 Portland, OR 97205 dockets@oregoncub.org</p>
<p>G. Catriona McCracken Citizens' Utility Board of Oregon 610 SW Broadway, Ste 400 Portland, OR 97205 catriona@oregoncub.org</p>	<p>Robert Jenks Citizens' Utility Board of Oregon 610 SW Broadway, Ste 400 Portland, OR 97205 bob@oregoncub.org</p>
<p>Melinda J. Davison Davison Van Cleve PC 333 SW Taylor – Ste 400 Portland, OR 97204 mjd@dvclaw.com</p>	<p>Kevin Higgins Energy Strategies LLC 215 State Street, Suite 200 Salt Lake City, UT 84111-2322 khiggins@energystrat.com</p>
<p>Nona Soltero Fred Meyer Stores/Kroger 3800 SE 22nd Ave Portland, OR 97202 nona.soltero@fredmeyer.com</p>	<p>Katherine A. McDowell McDowell Rackner & Gibson, PC 419 SW 11th Avenue, Suite 400 Portland, OR 97205 katherine@mcd-law.com</p>
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Donald W. Schoenbeck Regulatory & Cogeneration Services, Inc. 900 Washington St. Ste 780 Vancouver, WA 98660-3455 <u>dws@r-c-s-inc.com</u>	Gregory M. Adams Richardson & O’Leary PO Box 7218 Boise, ID 83702 <u>greg@richardsonandoleary.com</u>

DATED this 28th day of May, 2013.

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

/s/ Samuel L. Roberts
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