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**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

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In the Matter of

ALLIANCE OF WESTERN ENERGY  
CONSUMERS,

Petition for Investigation into Long-Term  
Direct Access Programs

Docket No. UM-2024

**PETITION TO INTERVENE OF  
WALMART INC.**

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Pursuant to ORS 756.525 and OAR 860-001-0300(2), Walmart Inc. (“Walmart”) hereby petitions the Public Utility Commission of Oregon (“Commission”) for leave to intervene in the above-referenced docket 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 Inc.  
Attn: Steve W. Chriss  
Director, Energy and Strategy Analysis  
2001 SE Tenth Street  
Bentonville, Arkansas 72716-0550  
[Stephen.Chriss@walmart.com](mailto: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](mailto: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”) and PacifiCorp. 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.
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 long-term direct access program in the State of 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.
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 11th day of October, 2019.

/s/ Vicki M. Baldwin

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