
BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for a General Rate Revision

Docket No. UE 394

OPENING BRIEF OF WALMART INC.

OPENING BRIEF

Pursuant to the Ruling issued by the Administrative Law Judge (“ALJ”) in this case on January 6, 2022, which was updated on February 17, Walmart Inc. (“Walmart”) hereby submits its Opening Brief.

Portland General Electric Company (“PGE”) filed a First Partial Stipulation in this docket on September 30, 2021, resolving all issues related to Cost of Capital. PGE then filed a Second Partial Stipulation on November 5, 2021, and a Third Partial Stipulation on January 18, 2022, after reaching agreements with the parties on certain matters through the course of multiple settlement conferences. On February 7, 2022, PGE filed a Fourth Partial Stipulation that resolved several other issues, including rate spread, allocation of the Customer Impact Offset (“CIO”) and certain rate design issues. A hearing was held on February 10 on the remaining open issues.

On February 9, the Natural Resources Defense Council (“NRDC”) and the Northwest Energy Coalition (“NWECC”) filed an objection to one item settled in the Third Partial

Stipulation. The Chief ALJ issued a Ruling on February 17 setting a schedule to handle NRDC's and NWECE's objection.

Walmart's Testimony in this case focused on rate spread, allocation of the CIO and establishment of certain rate design issues. All of Walmart's issues were resolved by the Fourth Partial Stipulation. Therefore, Walmart has no further issues to discuss in an opening brief.

Walmart reserves its right to participate in the further proceedings set to handle the NRDC/NWECE objection. Nevertheless, Walmart notes that the package of four settlements represents the just and reasonable outcome of extensive arms-length negotiations conducted in good faith between the parties in this docket. It is a balance of all the elements contained in those four settlements. Removing one of the elements from one of the settlements changes that balance.

DATED this 22nd day of February 2022.

/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 Inc.