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Attorneys for Walmart Stores, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power's Proposed Electric Service Schedule No. 34, Renewable Energy Tariff

Docket No. 16-035-T09

PETITION FOR LEAVE TO INTERVENE OF WAL-MART STORES, INC.

In accordance with the provisions of Rule R746-100-7 of the Public Service Commission's Rules of Practice and Procedure, Wal-Mart Stores, Inc. ("Walmart") hereby petitions the Utah Public Service Commission ("Commission") for leave to intervene in the above-referenced proceeding, and requests that the Commission issue an order allowing Walmart to participate fully in this matter.

In support of its Petition to Intervene, Walmart states as follows:

- 1. On June 17, 2016, PacifiCorp, doing business as Rocky Mountain Power ("RMP" or the "Company"), requested approval of its proposed Electric Service Schedule No. 34, Renewable Energy Tariff.
- 2. On June 27, 2016, the Commission issued its Scheduling Order, Notice of Hearing, and Notice of Public Witness Hearing ("Order") in this matter.
- 3. Walmart is a large retailer with its corporate offices located at 2001 SE Tenth Street, Bentonville, Arkansas 72716-0550. Walmart has 62 facilities in Utah with over 17,000 associates. Forty-eight of those facilities take service from RMP.

- 4. The interests of Walmart will not be adequately represented by any other party to this proceeding.
- 5. Walmart has a direct, immediate, and substantial interest in this proceeding as a customer of RMP. Reducing energy use and using renewable energy is a core element of the business and sustainability strategies of Walmart. The rate Walmart pays for electric service from RMP in Utah and its ability to take full advantage of the proposed Renewable Energy Tariff may be affected by a Commission decision in this proceeding.
- 6. 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 Utah are protected.
- 7. If Walmart is granted leave to intervene in this proceeding, it hereby requests that service of all pleadings, notices, *etc*. be made to the following:

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Steve W. Chriss

Walmart Stores, Inc.

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- 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.
- 9. WHEREFORE, Walmart 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 13th day of July, 2016.

/s/ Vicki M. Baldwin

Vicki M. Baldwin PARSONS BEHLE & LATIMER Attorneys for Walmart Stores, Inc.

CERTIFICATE OF SERVICE

Docket No. 16-035-T09

I hereby certify that on this 13th day of July 2016, I caused to be e-mailed, a true and correct copy of the foregoing **PETITION FOR LEAVE TO INTERVENE OF**

WALMART STORES INC., to:

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/s/_Chermaine D. Gord