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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Collaborative Stakeholder Process for Rocky Mountain Power's Grid Modernization and Rate Design	Docket No. 21-035-16
	Petition to Intervene of Walmart Inc.

Walmart Inc. ("Walmart") files this Petition, consistent with Utah Code § 63G-4-207 and Utah Administrative Code Rule R746-1-108, for leave to intervene in the above-captioned docket and requests that the Public Service Commission ("Commission") issue an order allowing Walmart to participate fully in this matter.

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

1. The Commission initiated this docket on March 17, 2021, for the purpose of establishing a collaborative stakeholder process related to grid modernization and rate design.
2. The Commission issued its Second Scheduling Order ("Order") in this docket on June 14, 2021. Pursuant to the Order, any interested person that wishes to participate in the Informal Workgroup Meetings planned to be held in this docket may file a petition for intervention. *See* Order at 2. Once filed, that person will be

included in information related to, among other things, the scheduling of the Informal Workgroup Meetings. *Id.*

3. Walmart operates 59 retail units in Utah, 3 distribution centers, and employs over 20,000 associates.¹ Walmart is a large commercial customer of Rocky Mountain Power (“RMP”), owning and operating approximately 46 retail facilities and three distribution centers in RMP’s service territory.
4. Walmart has a direct, immediate, and substantial interest in this proceeding because the rates it pays for electric service and the type of service it receives may be affected by the outcome of this proceeding.
5. Walmart’s interests will not be adequately represented by any other party to this proceeding.
6. If Walmart is granted leave to intervene in this proceeding, it requests that service of all pleadings, notices, and other filings in this docket be made to:

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¹ <https://corporate.walmart.com/our-story/locations/united-states/utah>

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7. Walmart's intervention in this docket will not impair the interests of justice and the orderly and prompt conduct of this proceeding.
8. Walmart has not yet determined its specific positions, level of its participation, or the precise nature of the relief Walmart will seek. Walmart seeks to intervene to protect its interests in Utah and requests that the Commission grant Walmart intervention as its interests may appear.

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.

DATED this ____ day of June 2021

/s/ Vicki M. Baldwin

VICKI M. BALDWIN
PARSONS BEHLE & LATIMER
Attorneys for Walmart Inc.

CERTIFICATE OF SERVICE

(Docket No. 21-035-16)

I hereby certify that on this day 23rd day of June 2021, I caused to be e-mailed, a true and correct copy of the foregoing PETITION TO INTERVENE OF WALMART INC. to:

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/s/ Madeline Malmquist _____