

STATE OF NORTH CAROLINA  
 UTILITIES COMMISSION  
 RALEIGH  
 DOCKET NO. E-100, SUB 179

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:	)	<b>PETITION TO INTERVENE OF</b>
	)	<b>WALMART INC.</b>
Duke Energy Progress, LLC, and Duke	)	
Energy Carolinas, LLC, 2022 Biennial	)	
Integrated Resource Plans and Carbon Plan	)	

Pursuant to North Carolina Utilities Commission ("Commission") Rules, including Rules R1-5, R1-7, and R1-19, Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matters. In support of its Petition to Intervene, Walmart submits as follows:

1. On November 19, 2021, the Commission issued an Order Requiring Filing of Carbon Plan and Establishing Procedural Deadlines, which required Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") (collectively, "Companies") to file an initial Carbon Plan by April 1, 2022.

2. On November 29, 2021, the Commission issued an Order extending the Companies' deadline to file their proposed Carbon Plan to May 16, 2022, and ordered intervening parties make their responsive filings by July 15, 2022.

3. Walmart is a national retailer of goods and services throughout the United States, including in North Carolina and South Carolina. Walmart is a large commercial customer of the Companies, with 144 stores and five distribution centers in the Companies' North Carolina service territory. Walmart purchases over 479 million kWh annually from the Companies in North Carolina, principally pursuant to DEC's Rate Schedule Optional Power Service, Time of Use with

Voltage Differential ("OPT") and DEP's Rate Schedule Small General Service – Time of Use ("SGS-TOU").

4. Walmart has an interest in this proceeding because electricity is one of the single highest operating costs faced by it. Moreover, Walmart has established aggressive and significant renewable energy goals.<sup>1</sup> As such, the Companies' efforts to develop a Carbon Plan directly impact Walmart's operations in North Carolina and its renewable energy goals. Walmart has been an active participant in dockets filed by the Companies regarding their Carbon Plan, including NCUC E-2, Sub 1297 and E-7, Sub 1268 (Solar Procurement Plan) and E-7 Sub, 1259 and E-2, Sub 1283 (request for joint proceedings by the North and South Carolina Commissions).

5. Moreover, Walmart has substantial experience with renewable energy, both at a corporate level and in other jurisdictions in which it operates that it would bring to bear in this proceeding. Walmart has been an active participant in dockets before the Virginia State Corporation Commission concerning implementation of the Virginia Clean Economy Act that, like North Carolina, seeks to bring Virginia to a carbon-free economy by 2050. This collective experience would assist the Commission's analysis and consideration of the Companies' Petition.

6. Walmart's principal office is at 2608 SE J Street, Bentonville, Arkansas 72716. All correspondence related to this proceeding should be addressed to counsel:

Carrie H. Grundmann  
Stephanie U. Eaton  
Spilman Thomas & Battle, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
Phone: (336) 725-4710  
Facsimile: (336) 725-4476  
Email: [cgrundmann@spilmanlaw.com](mailto:cgrundmann@spilmanlaw.com)  
[seaton@spilmanlaw.com](mailto:seaton@spilmanlaw.com)

---


<sup>1</sup> See <https://corporate.walmart.com/newsroom/2020/09/21/walmart-sets-goal-to-become-a-regenerative-company>

7. Pursuant to Commission Rule R1-39, Walmart agrees to accept electronic service of all filings in this docket.

**WHEREFORE**, Walmart Inc. respectfully requests that it be granted leave to intervene and to participate fully as a party to this docket.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By   
Carrie H. Grundmann (NC Bar No. 52711)  
Stephanie U. Eaton (NC Bar No. 25111)  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC  
Phone: (336) 725-4710  
Fax: (336) 725-4476  
E-mail: [cgrundmann@spilmanlaw.com](mailto:cgrundmann@spilmanlaw.com)  
[seaton@spilmanlaw.com](mailto:seaton@spilmanlaw.com)

*Counsel to Walmart Inc.*

Dated: May 9, 2022

VERIFICATION

Carrie H. Grundmann, first being duly sworn, deposes and says that she is the attorney for Walmart Inc.; that she has read the foregoing Petition to Intervene of Walmart Inc., and that the same is true of her personal knowledge, except as to any matters and things therein stated on information and believe, and as to those, she believes them to be true; and that she is authorized to sign this verification on behalf of Walmart.

This the 9<sup>th</sup> day of May 2022.

*Carrie H. Grundmann*

Carrie H. Grundmann

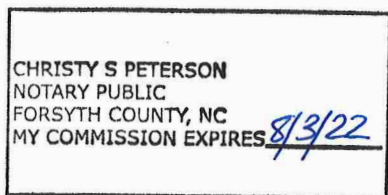
NORTH CAROLINA  
FORSYTH COUNTY

Sworn to and Subscribed before me,  
this the 9<sup>th</sup> day of May, 2022.

*Christy S. Peterson*

Notary Public

My Commission Expires: 8/3/22



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Petition to Intervene of Walmart Inc. has been served this day upon the parties of record in this proceeding by electronic mail.



---

Carrie H. Grundmann (NC Bar No. 52711)

Dated: May 9, 2022