

STATE OF NORTH CAROLINA
 UTILITIES COMMISSION
 RALEIGH
 DOCKET NO. E-2, SUB 1297
 DOCKET NO. E-7, SUB 1268

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:)	PETITION TO INTERVENE OF
)	WALMART INC.
Duke Energy Progress, LLC, and Duke)	
Energy Carolinas, LLC, 2022 Solar)	
Procurement Pursuant to Session Law)	
2021-165, Section (c))	

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 March 11, 2022, the Commission issued an Order opening separate dockets for Duke Energy Carolinas, LLC's ("DEC") and Duke Energy Progress, LLC's ("DEP") (collectively, "Companies") 2022 Solar Procurement Plan.

2. On March 14, 2022, the Companies filed their Petition for Authorization of 2022 Solar Procurement Program ("Petition") pursuant to Section 2.(c) of North Carolina Session Law 2021-165 ("HB 951) and the Commission's *Order Opening Separate Dockets and Establishing Procedural Deadlines*.

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 its highest operating costs. Moreover, Walmart has established aggressive and significant renewable energy goals.¹ As such, the Companies' efforts to develop a Solar Procurement Program in order to meet the goals set forth in Section 2.(c) of North Carolina Session Law 2021-165 ("HB 951") directly impact Walmart's operations in North Carolina and South Carolina as well as Walmart's renewable energy goals.

5. 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 also been an active participant in numerous dockets including in the Commonwealth of Virginia concerning the implementation of the Virginia Clean Economy Act, which 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:

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¹ 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 
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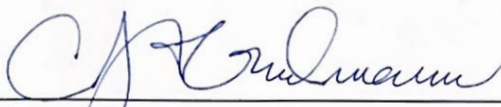
Counsel to Walmart Inc.

Dated: March 28, 2022

VERIFICATION

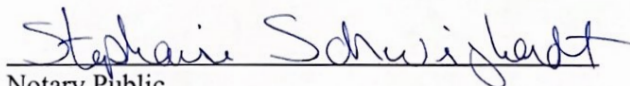
Carrie H. Grundmann, first being duly sworn, deposes and says that she is the attorney for Walmart Inc.; that she has read the foregoing Petition to Intervene of Walmart Inc., and that the same is true of her personal knowledge, except as to any matters and things therein stated on information and believe, 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 28th day of March, 2022.


Carrie H. Grundmann

COMMONWEALTH OF KENTUCKY
COUNTY OF Franklin

Sworn to and Subscribed before me, this the 28 day of March, 2022.


Notary Public

My Commission Expires: 1/14/2023

ID#: 614400



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: March 28, 2022