

STATE OF NORTH CAROLINA  
UTILITIES COMMISSION  
RALEIGH  
DOCKET NO. E-2, SUB 1283  
DOCKET NO. E-7, SUB 1259

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of: )  
 )  
Joint Petition of Duke Energy Carolinas, LLC )  
and Duke Energy Progress, LLC, to Request )  
the Commission to Hold a Joint Hearing with )  
the Public Service Commission of South ))  
Carolina to Develop Carbon Plan )

**PETITION TO INTERVENE OF  
WALMART INC.**

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 9, 2021, Duke Energy Carolinas, LLC ("DEC"), and Duke Energy Progress, LLC ("DEP") (collectively, "Companies") filed a Joint Petition with this Commission requesting that it conduct a joint hearing with the Public Service Commission of South Carolina ("SC PSC") to develop a carbon plan consistent with the carbon reduction goals of N.C. Gen. Stat. §§ 62-2, 62-30, 62-48, 62-110.1(c), Part I of Session Law 2021-165 ("HB 951") (the "Petition").

2. 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 174 facilities in the Companies' North Carolina service territory, including Walmart Supercenters, Sam's Clubs, five distribution centers, gas stations, and other facilities.

Walmart purchases over 483 million kWh annually from the Companies in North Carolina, principally pursuant to DEC's Rate Schedule OPT and DEP's Rate Schedule SGS-TOU.

3. 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 operation in North Carolina and South Carolina as well as Walmart's renewable energy goals.

4. 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.

5. Walmart will be filing an intervention to participate in the companion proceeding presently pending before the SC PSC.

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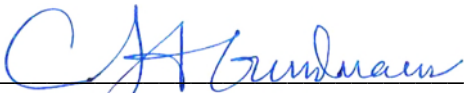
<sup>1</sup> See <https://corporate.walmart.com/newsroom/2020/09/21/walmart-sets-goal-to-become-a-regenerative-company>

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   
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*Counsel to Walmart Inc.*

Dated: December 20, 2021

VERIFICATION

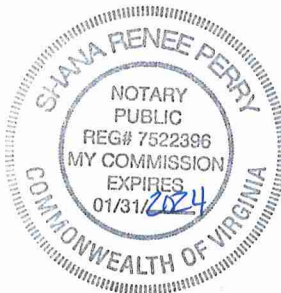
Carrie H. Grundmann, first being duly sworn, deposes and says that she is the attorney for Walmart Inc.; that she has read the foregoing Petition to Intervene of Walmart Inc., and that the same is true of her personal knowledge, except as to any matters and things therein stated on information and believe, 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 20<sup>th</sup> day of December, 2021.

Carrie H. Grundmann

COMMONWEALTH OF VIRGINIA  
CITY OF ROANOKE

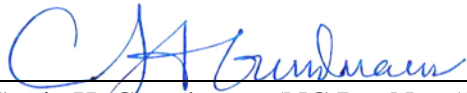
Sworn to and Subscribed before me, this the 20<sup>th</sup> day of December, 2021.

  
Notary Public

My Commission Expires: 1-31-24

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing letter in lieu of Comments has been served this day upon the parties of record in this proceeding by electronic mail.

  
\_\_\_\_\_  
Carrie H. Grundmann (NC Bar No. 52711)

Dated: December 20, 2021