



Control Number: 49737



Item Number: 72

Addendum StartPage: 0

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THE STATE OFFICE
PUBLIC UTILITY COMMISSION
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APPLICATION OF SOUTHWESTERN)
ELECTRIC POWER COMPANY FOR)
CERTIFICATE OF CONVENIENCE)
AND NECESSITY AUTHORIZATION)
AND RELATED RELIEF FOR THE)
ACQUISITION OF WIND)
GENERATION FACILITIES)

BEFORE
ADMINISTRATIVE HEARINGS

MOTION TO INTERVENE OF WALMART INC.

Pursuant to Rule 22-104 of the Procedural Rules of the Public Utility Commission of Texas, Walmart Inc. submits this motion and respectfully requests an order permitting its intervention and participation in this proceeding:

1. Walmart is a Delaware corporation authorized to do business in Texas. Walmart's business address is Sam M. Walton Development Complex, 2001 SE 10th Street, Bentonville, AR 72716-0550.

2. Walmart is a large retail customer of Southwestern Electric Power Company ("SWEPCO"), owning and operating approximately 20 retail stores and related facilities in SWEPCO's Texas service territory. Collectively, these facilities consume over 74 million kWh of electricity on an annual basis.

3. On July 15, 2019, SWEPCO filed an application ("Application") seeking authorization to acquire certain Selected Wind Facilities. Walmart is currently reviewing SWEPCO's Application and supporting evidence to finalize its position. However, there is no question that an acquisition such as that being proposed by SWEPCO could directly and substantially impact Walmart's business and operations in Texas. Accordingly, Walmart has a direct interest in the outcome of this proceeding.

**MOTION TO INTERVENE OF
WALMART INC.,
SOAH DOCKET NO. 473-19-6862
PUC DOCKET NO. 49737**

4. In addition, as a large commercial customer, Walmart's interests differ from those of other customer groups represented in this proceeding. Given the unique configuration of its facilities within SWEPCO's service territory, Walmart's interests cannot be adequately represented by any existing or future participant in this proceeding.

5. Allowing Walmart to intervene in this proceeding will serve the public interest as well by ensuring the Commission is apprised of the interests of a large commercial electric customer. With operations in many different states and markets, Walmart has gained substantial and unique insights regarding the issues in rate setting proceedings.

6. The following persons should be included on the service list in this proceeding, and all communications concerning this matter should be addressed to:

Rick D. Chamberlain
Wheeler & Chamberlain
6 N.E. 63rd Street, Suite 400
Oklahoma City, OK 73105-1401
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Steve W. Chriss
Director, Energy and Strategy Analysis
Walmart Inc.
2001 S.E. 10th Street
Bentonville, AR 72716-0550
Telephone: (479) 204-1594
E-mail: stephen.chriss@wal-mart.com

WHEREFORE, Walmart Inc. respectfully requests to intervene as a full party of record and to fully participate in this proceeding including, without limitation, filing and presenting comments and/or testimony, cross-examination of witnesses, participation in all formal and informal conferences and hearings, and filings of briefs and any other pleading.

**MOTION TO INTERVENE OF
WALMART INC.,
SOAH DOCKET NO. 473-19-6862
PUC DOCKET NO. 49737**

Dated this 30th day of August, 2019.

Respectfully submitted,

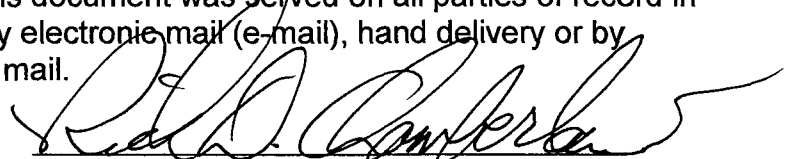
By 

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ATTORNEY FOR INTERVENOR
WALMART INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on all parties of record in this proceeding on August 30, 2019, by electronic mail (e-mail), hand delivery or by depositing a copy in the United States mail.


Rick D. Chamberlain

SOAH DOCKET NO. 473-19-4421
PUC DOCKET NO. 49494

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APPLICATION OF AEP TEXAS, INC. § BEFORE THE STATE OFFICE
§
FOR AUTHORITY TO CHANGE § OF
§
RATES § ADMINISTRATIVE HEARINGS

TEXAS COTTON GINNERS' ASSOCIATION'S
INITIAL BRIEF

Dated: September 4, 2019

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450

SOAH DOCKET NO. 473-19-4421

PUC DOCKET NO. 49494

APPLICATION OF AEP TEXAS, INC. § BEFORE THE STATE OFFICE
FOR AUTHORITY TO CHANGE § OF
RATES § ADMINISTRATIVE HEARINGS

TEXAS COTTON GINNERS' ASSOCIATION'S INITIAL BRIEF

This is the Initial Brief on the Merits of the Texas Cotton Ginnery Association (TCGA) in the above referenced docket. TCGA's participation in this case has been admittedly limited.

TCGA virtually always participates only in cost allocation and rate design issues; that is the case in this docket as well. On those issues and elsewhere in this docket, TCGA anticipates its position on many of those issues will mirror that of certain intervenors and/or the Staff, and expressly reserves the right to adopt such positions in its Reply Brief. Further, TCGA reserves the right to reply to other cost allocation, rate design and transmission cost recovery factor arguments in its Reply Brief.

TCGA will make no further argument at this stage of the proceeding, while reserving the right to participate in the Reply Brief stage of this docket.

Respectfully submitted,
BRADY & HAMILTON, LLP

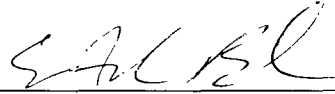


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ATTORNEYS FOR INTERVENOR
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all parties known of record via facsimile, U.S. mail, or electronically on this 4th day of September, 2019.



S. Adam Bender

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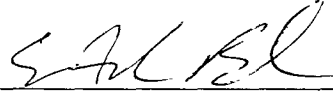


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