



Control Number: 49421



Item Number: 271

Addendum StartPage: 0

SOAH DOCKET NO. 473-19-3864
PUC DOCKET NO. 49421

2019 JUL 20 PM 3:04

APPLICATION OF CENTERPOINT § BEFORE THE STATE OFFICE
ENERGY HOUSTON ELECTRIC, LLC § OFFICE OF THE CLERK
FOR AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

MOTION TO INTERVENE OF WALMART INC.

Pursuant to Rule 22-104 of the Procedural Rules of the Public Utility Commission of Texas ("Commission"), Walmart Inc. ("Walmart") submits this Motion to Intervene and respectfully requests an order permitting its intervention and participation in this proceeding. In support of this Motion, Walmart states as follows:

1. Walmart Inc. is a Delaware corporation authorized to do business in Texas, with a business address of Sam M. Walton Development Complex, 2001 SE 10th Street, Bentonville, Arkansas 72716-5530.

2. Walmart is a large retail customer of CenterPoint Energy Houston Electric, LLC ("CenterPoint"), owning and operating approximately 86 retail stores and related facilities and 3 distribution centers in CenterPoint's service territory. Collectively, these facilities consume over 430 million kWh of electricity on an annual basis, primarily in the Secondary Greater than 10 kVA service class.

3. On April 5, 2019, CenterPoint filed its application (the "Application") seeking, among other things, authority to increase its base rates for its retail electric customers in Texas and establish a rider to refund customers unprotected excess deferred income taxes resulting from the Tax Cuts and Jobs Act of 2017. The Application also seeks approval of a proposed allocation of the requested increase among the various customer classes.

4. Walmart is currently reviewing the Application and supporting evidence to finalize its position. However, because Walmart is a large retail customer of CenterPoint, an increase in the rates and charges for electricity as requested in the Application is likely to impact Walmart's business and operations in Texas. Accordingly, Walmart has a justiciable interest in this proceeding.

5. Walmart's interests are unique and are not adequately represented by any other Party to this proceeding. Allowing Walmart to intervene in this proceeding will serve the public interest by ensuring the Commission is apprised of the interests of a large commercial electric customer.

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

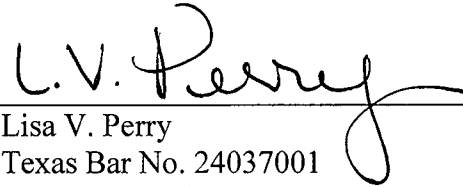
Lisa V. Perry
Oram & Houghton, PLLC
402A W. Palm Valley Blvd., #370
Round Rock, TX 78664-4200
Direct Dial: (720) 507-3634
Fax: (720) 302-0441
lperry@oram-houghton.com

Steve W. Chriss
Director, Energy Services
Walmart Inc.
2001 S.E. 10th Street
Bentonville, AR 72716-5530
Telephone: (479) 204-1594
stephen.chriss@walmart.com

WHEREFORE, Walmart Inc. respectfully requests that the Commission grant it intervenor status as a full party of record and allow it to fully participate in this proceeding.

Dated this 20th day of May, 2019.

Respectfully submitted,

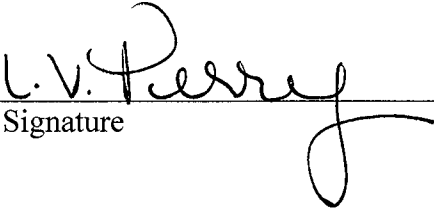


Lisa V. Perry
Texas Bar No. 24037001
Oram & Houghton, PLLC
402A W. Palm Valley Blvd., #370
Round Rock, TX 78664-4200
Direct Dial: (720) 507-3634
Fax: (720) 302-0441
lperry@oram-houghton.com

Attorneys for Walmart Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **Motion to Intervene** was served on all parties of record in this proceeding on the 20th day of May 2019, by electronic mail, hand delivery, facsimile, or United States mail.



Signature