

## **Filing Receipt**

Filing Date - 2025-02-25 11:14:13 AM

Control Number - 57579

Item Number - 40

## SOAH Docket No. 473-25-11558 PUC Docket No. 57579

)

)

APPLICATION OF CENTERPOINT ENERGY HOUSTON ELECTRIC, LLC FOR APPROVAL OF ITS 2026-2028 TRANSMISSION AND DISTRIBUTION SYSTEM RESILIENCY PLAN

BEFORE THE STATE OFFICE OF 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 ("Motion") and respectfully requests permission to intervene and participate in this proceeding. In support of this Motion Walmart states:

1. Walmart is a Delaware corporation authorized to do business in Texas.

Walmart's principal office is at 2608 SE J Street, Bentonville, AR 72716. Walmart is a

large retail electric customer of CenterPoint Energy Houston Electric, LLC,

("CenterPoint" or the "Company") owning and operating various facilities in its Texas service territory.

2. Among other things, CenterPoint's Application herein seeks approval of a System Resiliency Plan with proposed capital expenditures of \$5.543 billion and incremental O&M expenses of \$210.7 million."<sup>1</sup> As a Texas retail electric customer whose future electric rates will be impacted by this proceeding, Walmart has a direct interest in this proceeding and its outcome.

3. As a large commercial customer, Walmart's interests differ from those of other customers or customer groups represented in this proceeding. Given the unique

<sup>&</sup>lt;sup>1</sup> El Paso Electric Company's Petition And Statement Of Intent To Change Rates, p. 1, first par. (filed Jan. 27, 2025).

configuration of its facilities within CenterPoint's service territory, Walmart's interests cannot be adequately represented by any existing or future participant.

4. Allowing Walmart to intervene in this proceeding will serve the public

interest as well by appraising the Commission of the views 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.

5. The following should be included on the service list in this proceeding and all communication concerning this matter should be addressed to:

Rick D. Chamberlain	Eric Austin
Attorney at Law	Senior Manager Utility Partnerships
P.O. 21866	Walmart Inc.
Oklahoma City, OK 73156-1866	2608 SE J street
Telephone: (405) 229-4154	Bentonville AR 72716
Facsimile: (870) 617-1485	Telephone: (575) 616-1635
Email:	Email:
R <u>ick@ChamberlainLawOffices.com</u>	Eric.Austin@walmart.com

WHEREFORE, Walmart Inc. respectfully requests it be granted intervenor status

as a full party of record and be allowed to fully participate in this Docket 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, to the extent it deems necessary for full

participation herein.

Dated this 25th day of February 2025.

Respectfully submitted,

/s/ Rick D. Chamberlain

Rick D. Chamberlain Attorney at Law Oklahoma Bar Association No. 11255 State Bar of Texas No. 24081827 P.O. Box 21866 Oklahoma City, OK 73156-1866 Tel.: (405) 229-4154 Fax: (870) 617-1485 Email: Rick@ChamberlainLawOffices.com

ATTORNEY FOR 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 February 25, 2025, by electronic mail (email), facsimile, hand

delivery or by depositing a copy in the United States mail.

<u>/s/ Rick D. Chamberlain</u> Rick D. Chamberlain