Norman M. Semanko, ISB No. 4761 Parsons Behle & Latimer 800 West Main Street, Suite 1300 Boise, Idaho 83702 Telephone: 208-562-4901

Justina A. Caviglia, *pro hac vice pending* Parsons Behle & Latimer 50 West Liberty Street, Suite 750 Reno, Nevada 89502 Telephone: 775-789-6559

Attorneys for Walmart Inc.

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF AVISTA CORPORATION FOR THE AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR ELECTRIC AND NATURAL GAS SERVICE TO ELECTRIC AND NATURAL GAS CUSTOMERS IN THE STATE OF IDAHO

CASE NOS. AVU-E-23-01 AVU-G-23-01

PETITION TO INTERVENE OF WALMART INC.

Pursuant to Rules 71-75 of the Idaho Public Utilities Commission's Rules of Practice and

Procedure, and the Notice of Intervention Deadline (Order No. 35684) Walmart Inc. ("Walmart")

petitions the Idaho Public Utilities Commission ("Commission" or "IPUC") for leave to intervene

in the above-captioned matter. In support of this petition, Walmart states as follows:

1. The names and addresses of the representatives of Walmart are:

Norman M. Semanko Parsons Behle & Latimer 800 West Main Street, Suite 1300 Boise, Idaho 83702 Telephone: 208-562-4901 nsemanko@parsonsbehle.com

Justina A. Caviglia, *pro hac vice pending* Parsons Behle & Latimer 50 West Liberty Street, Suite 750 Reno, Nevada 89502 Telephone: 775-789-6559 jcaviglia@parsonsbehle.com

. . .

Steve W. Chriss Director, Energy Services Walmart Inc. 2608 Southeast J Street Bentonville, Arkansas 72716 Telephone: 479-204-1594 Stephen.Chriss@walmart.com

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the names and addresses above. In the interest of conservation and cost reduction, please provide hard copies of pleadings, testimony, and briefs only. All other documents may be provided via electronic mail in accordance with IPUC Rules 31.01.01.063.01-.02.

2. Walmart is an American multinational retail corporation with stores in all fifty (50) states and Puerto Rico. Walmart operates 27 retail units and employs over 9,000 associates in Idaho. In the fiscal year ending 2023, Walmart purchased over \$553 million worth of goods and services from Idaho-based suppliers, supporting over 8,000 suppliers jobs.¹ Walmart is also a large commercial customer of Avista Corporation ("Avista" or "Company"), owning and operating approximately 6 retail store and related facilities in the Company's territory. Collectively, these facilities consume over 16 million kWh of electricity annually.

3. Walmart has a direct, immediate, diverse and substantial interest in the outcome of this case, and the interests of Walmart will not be adequately represented by any other party to this proceeding. A Commission decision in this proceeding will have a direct, material impact on the electric rates and terms and conditions of service Walmart will be subject to as a result of this case.

4. Walmart anticipates participating in this matter to the extent necessary to ensure its interests in Idaho are protected, with full rights of a party to perform discovery, submit testimony, examine witnesses, participate in hearings and present evidence on any issues raised in this matter.

¹ <u>https://corporate.walmart.com/about/idaho</u>

5. Walmart has not yet determined the extent of its participation or the precise nature of the relief it will request but the interests of justice and the orderly and prompt conduct of this proceeding will not be impaired by the grant of Walmart's petition to intervene. Neither will Walmart's participation unnecessarily broaden the issues or burden the record in this proceeding.

WHEREFORE, Walmart respectfully requests that the Commission grant its Petition to Intervene in this matter with full party status.

DATED this 9th day of March 2023.

/s/ Justina A. Caviglia

/s/ Norman M. Semanko

CERTIFICATE OF SERVICE (Case Nos. AVU-E-23-01; AVU-G-23-01)

I hereby certify that on this 9th day of March 2023, I caused to be served by e-mail, a true

and correct copy of this **PETITION TO INTERVENE OF WALMART INC.** to:

AVISTA CORPORATION David J. Meyer, Esq.: <u>David.Meyer@avistacorp.com</u> Patrick D. Ehrbar: <u>Pat.Ehrbar@avistacorp.com</u> <u>Avistadockets@avistacorp.com</u>

IDAHO PUBLIC UTILITIES COMMISSION Jan Noriyuki: jan.noriyuki@puc.idaho.gov secretary@puc.idaho.gov

DEPUTY ATTORNEY GENERAL Dayn Hardie: <u>dayn.hardie@puc.idaho.gov</u> <u>chris.burdind@puc.idaho.gov</u> <u>claire.sharp@puc.idaho.gov</u>

CLEARWATER PAPER CORPORATION Peter J. Richardson: <u>peter@richardsonadams.com</u> Dr. Don Reading: <u>dreading@mindstrpring.com</u> <u>carol.haugen@clearwaterpaper.com</u> <u>nathan.smith@clearwaterpaper.com</u> jamie.mcdonald@clearwaterpaper.com

/s/ Roni L. Shaffer