

February 20, 2018

Via NCUC ELECTRONIC FILING

Ms. M. Lynn Jarvis
Chief Clerk
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, North Carolina 27603

**Re: Petition of Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC,
Requesting Approval of Green Source Advantage Program and Rider GSA to
Implement G.S. 62-159.2**

Docket Nos. E-2, Sub 1170 and E-7, Sub 1169

Dear Ms. Jarvis:

Please find attached for electronic filing with the North Carolina Utilities Commission ("Commission") a copy of the Petition to Intervene of Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), in the above-referenced matter. By copy of this letter, I am serving all parties of record via Electronic Mail and/or First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton (NC Bar No. 25111)
Carrie M. Harris (NC Bar No. 52711)

*Counsel to Wal-Mart Stores East, LP and Sam's East,
Inc.*

CMH/sds:10579134
Attachments
c: Certificate of Service

STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH

DOCKET NO. E-2, SUB 1170

DOCKET NO. E-7, SUB 1169

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of:)	
)	PETITION TO INTERVENE
Petition of Duke Energy Progress, LLC, and)	OF WAL-MART STORES EAST, LP
Duke Energy Carolinas, LLC, Requesting)	AND SAM'S EAST, INC.
Approval of Green Source Advantage Program)	
and Rider GSA to Implement G.S. 62-159.2)	

Pursuant to North Carolina Utilities Commission ("Commission") Rules, including Rules R1-5, R1-7, and R1-19, Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On January 23, 2018, Duke Energy Carolinas, LLC ("DEC"), and Duke Energy Progress, LLC ("DEP") (collectively, "Companies") filed with the Commission a petition for approval of the Green Source Advantage Program ("GSA Program") and Rider GSA tariffs.

2. Walmart is a national retailer of goods and services throughout the United States. Walmart's principal office is at 2001 SE 10th Street, Bentonville, Arkansas 72716-0550. Its email address is Stephen.chriss@walmart.com.

3. Walmart has the privilege of providing its retail services in the State of North Carolina. Walmart is a large commercial customer of the Companies. Walmart has approximately 171 facilities in North Carolina that are served by the Companies, which include Walmart Supercenters, Sam's Clubs, a distribution center, gas stations, and other facilities. Walmart

purchases over 500 million kWh annually from the Companies, principally pursuant to DEC's Rate Schedule OPT and DEP's Rate Schedule SGS-TOU. Walmart is uniquely positioned because it purchases substantial amounts of electric and related services from the Companies' pursuant to multiple accounts at multiple locations.

4. Walmart has an interest in this proceeding because electricity is one of the single highest operating costs faced by Walmart. As a result, any modification to the Companies' electric rates and terms of service has the potential to substantially impact Walmart's operations in North Carolina.

5. Moreover, Walmart has established aggressive and significant renewable energy goals. In 2005, Walmart set an aspirational goal to be supplied 100 percent by renewable energy.¹ On November 4, 2016, Walmart announced new sustainability goals for 2025 that build on its existing energy goals and include: sourcing half of its global energy needs from renewable sources, and, through a combination of renewable energy and energy efficiency, reducing emissions in its operations by 18 percent.² The Corporate Renewable Energy Buyer's Principles, published by World Resources Institute and World Wildlife Fund, and to which Walmart is a signatory, provides more detail around corporate customer renewable energy needs.³ In light of this commitment to renewable energy, Walmart is interested in having access to a renewable energy product within the Companies' service territories; however, Walmart is concerned with the structure and design of the Companies' proposed GSA Program and Rider GSA tariffs.

6. 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.

¹ <http://corporate.walmart.com/global-responsibility/environmental-sustainability>

² <http://news.walmart.com/2016/11/04/walmart-offers-new-vision-for-the-companys-role-in-society>

³ <http://buyersprinciples.org/principles/>

7. Walmart has a substantial interest in this proceeding that is not represented by any other party.

8. The attorneys representing Walmart in this proceeding are:

Stephanie U. Eaton
Carrie M. Harris
Spilman Thomas & Battle, PLLC
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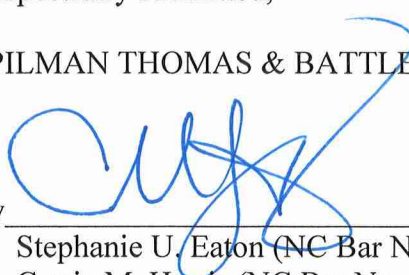
Ms. Eaton and Ms. Harris are authorized to accept service of papers in this proceeding on behalf of Walmart.

9. Pursuant to Commission Rule R1-39, Walmart agrees to accept electronic service of all filings in this docket.

WHEREFORE, Wal-Mart Stores East, LP and Sam's East, Inc., respectfully request that they 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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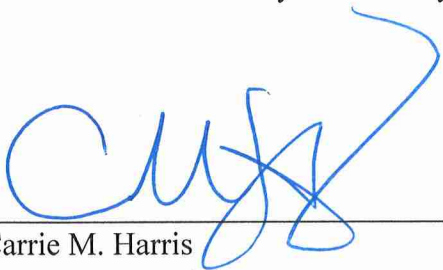
Counsel to Wal-Mart Stores East, LP and Sam's East, Inc.

Dated: February 20, 2018

VERIFICATION

Carrie M. Harris, first being duly sworn, deposes and says that she is the attorney for Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"); that she has read the foregoing Petition to Intervene of Wal-Mart Stores East, LP and Sam's East, Inc. and that the same is true of her personal knowledge, excepts 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 20th day of February, 2018.



Carrie M. Harris

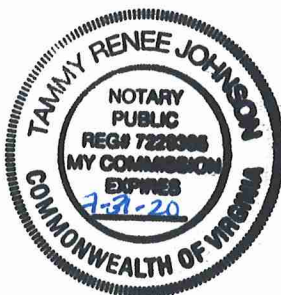
NORTH CAROLINA
FORSYTH COUNTY

Sworn to and Subscribed before me,
this the 20th day of February, 2018.



Notary Public

My Commission Expires: 7-31-20



BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

DOCKET NO. E-2, SUB 1170

DOCKET NO. E-7, SUB 1169

In the Matter of:

CERTIFICATE OF SERVICE

)
)
 Petition of Duke Energy Progress, LLC, and)
 Duke Energy Carolinas, LLC, Requesting)
 Approval of Green Source Advantage Program)
 and Rider GSA to Implement G.S. 62-159.2)

I hereby certify that I have this day served a copy of the foregoing Petition to Intervene of Wal-Mart Stores East, LP and Sam's East, Inc., upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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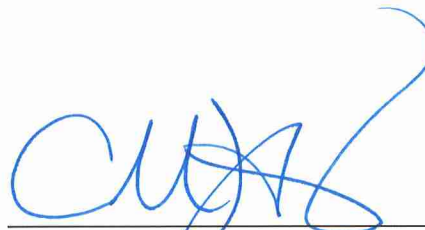
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Dated: February 20, 2018