

May 2, 2024

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**Re: Pennsylvania Public Utility Commission v. PECO Energy Company – Gas Division;  
Docket No. R-2024-3046932**

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Petition to Intervene of Walmart Inc. ("Walmart") in the above-referenced matter.

This document was filed electronically with the Commission on this date. All parties are being served a copy of this document in accordance with the enclosed Certificate of Service.

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

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC



By

Derrick Price Williamson  
Barry A. Naum  
Steven W. Lee

BAN/sds  
Enclosures

c: Administrative Law Judge Darlene Heep (via E-mail)  
Administrative Law Judge Marta Guhl (via E-mail)  
Certificate of Service



general increase in the Company's natural gas distribution rates of approximately \$111 million. The Company is also requesting a return on equity ("ROE") of 10.95 percent.

4. Walmart has the privilege of providing its retail services in the Commonwealth of Pennsylvania through its 116 Supercenters, 19 Discount Stores, 24 Sam's Clubs, 6 Distribution Centers, and 4 Fulfillment Centers.<sup>1</sup> Walmart is also a retail customer of PECO, with 20 retail units and related facilities served by the Company. Walmart purchases more than 870,000 therms annually from PECO, pursuant to Rate Schedule GC, General Service – Commercial and Industrial. The cost of natural gas comprises a significant portion of the operating costs of Walmart's various retail and distribution locations.

5. The Commission's final determination in this proceeding may directly impact the terms and conditions of the electric service that Walmart receives from the Company at multiple locations. Walmart therefore has a direct, substantial, and unique interest in the outcome of this proceeding that is not represented by any other party. See 52 Pa. Code § 5.72(a)(2).

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<sup>1</sup> <https://corporate.walmart.com/about/location-facts/united-states/pennsylvania>

**WHEREFORE**, Walmart Inc. requests that the Commission grant this Petition to Intervene and provide Walmart with full party status in this proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By   
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*Counsel to Walmart Inc.*

Dated: May 2, 2024

## VERIFICATION

I, Barry A. Naum, Counsel to Walmart Inc., hereby states that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information, and belief. I understand that the statements made herein are made subject to 18 Pa.C.S. § 4904 (pertaining to unsworn falsification to authorities).

Date: May 2, 2024



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Barry A. Naum



Certificate of Service  
Docket No. R-2024-3046932  
Page 2

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Barry A. Naum

Dated: May 2, 2024