

May 6, 2024

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

VIA ELECTRONIC FILING

Re: Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division; Docket No. R-2024-3046931

Dear Secretary Chiavetta:

Please find enclosed for filing with the Pennsylvania Public Utility Commission ("PUC" or "Commission") the Prehearing Conference Memorandum 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

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III. ANTICIPATED ISSUES

Walmart is still evaluating PECO's Filing and anticipates being informed by the record created in this case. At this preliminary stage, however, Walmart plans to pay careful attention to the proposed overall revenue increase, the allocation of costs among the various rate schedules, and PECO's proposed overall Return on Equity of 10.95%. Walmart anticipates pursuing these issues during this proceeding and reserves the right to raise further issues and to respond to all matters raised by other parties.

IV. PROPOSED WITNESSES AND EVIDENCE

Walmart is still in the process of evaluating whether it will sponsor testimony in this proceeding. In the event Walmart decides to sponsor testimony, Walmart will likely submit testimony from Lisa V. Perry, Director, Regulatory – Utility Partnerships, and will promptly inform the parties and the ALJs if this changes. Regardless, Walmart reserves the right to participate in this proceeding and adduce evidence through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

V. PROPOSED SCHEDULE AND DISCOVERY RULES

Walmart does not oppose the proposed procedural schedule set forth by the ALJs in the Prehearing Conference Order. Walmart will cooperate with the ALJs and the parties to formulate discovery rules in accordance with the Commission's regulations and ALJs' directives.

VI. SETTLEMENT

Walmart is willing to participate in settlement discussions so as to narrow or resolve issues in dispute among the parties.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

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Counsel to Walmart Inc.

Dated: May 6, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
v. : Docket No. R-2024-3046931
PECO Energy Company – Electric Division :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by participant).

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Dated: May 6, 2024