

**STATE OF NEW HAMPSHIRE**  
**before the**  
**PUBLIC UTILITIES COMMISSION**

Public Service Company of New Hampshire d/b/a Eversource Energy  
Notice of Intent to File Rate Schedules  
**DOCKET NO. DE 19-057**

**PETITION TO INTERVENE OF**  
**WALMART INC.**

Walmart, Inc. (“Walmart”) moves to intervene as a fully party intervenor in this proceeding pursuant to the N.H. Admin. Rules Puc 203.17 and RSA § 541-A:32. In support of this petition, Walmart states as follows:

1. Walmart, Inc. is a Delaware corporation to do business in New Hampshire. Its business address is: Sam M. Walton Development Complex, 2081 SE 10<sup>th</sup> Street, Bentonville, AR 72716-0550. Walmart requests that copies of all notices, pleadings, orders, correspondence, and other communications be directed to and served upon the undersigned counsel, who is admitted to practice and is in good standing as an attorney in Rhode Island, Massachusetts, and Michigan.

2. Public Service Company of New Hampshire d/b/a Eversource Energy (“Eversource”) is an investor-owned electric public utility operating within New Hampshire and is subject to the regulatory authority of this Commission.

3. Walmart is a large retail customer of Eversource, owning and operating approximately 20 retail stores, a distribution center, and related facilities in Eversource’s New Hampshire service territory. Collectively, these facilities consume over 65 million kWh of electricity on an annual basis.

4. On June 6, 2018, Eversource filed its Petition in this docket seeking, among other things, a rate increase of \$69.9 million. As a large retail customer of Eversource, Walmart will be directly and substantially impacted by the relief being requested by Eversource. Therefore, Walmart is a party within the zone of interests protected by RSA § 541-A:32 and has a direct interest in participating in this case. Walmart is entitled as a matter of right to intervene in this case to assure that its interests as to reliability, pricing, efficiency and adequacy of resources, as well as any other appropriate considerations, are addressed and protected in conjunction with its service from Eversource.

5. Walmart's interests are not adequately represented by the present parties, and, therefore, it would be detrimental to the public interest to deny this Petition to Intervene.

6. Walmart's intervention in this case will further the interests of justice and will not impair the orderly and prompt conduct of the proceedings.

7. Walmart's participation in this case will assist the Commission in understanding the impact of this case on Walmart's significant interests in it, as well as other issues presented by this case. Because of its interests in energy efficiency and demand side management technology, Walmart employs a sizeable number of employees focusing on energy and environmental issues. Many of these employees previously worked in the energy industry and can provide testimony that will assist in resolving the issues presented in this case.

8. If its intervention is granted, Walmart anticipates taking the position that Eversource's Petition should be carefully examined regarding issues that include, but are not limited to, the proposed rate increases and the components thereof, the proposed allocation of any rate increase among the various customer classes, and the proposed revisions to its electric rules, regulations and tariffs. Walmart reserves the right to take other positions and seek other

relief based upon a review of the various filings, the responses to discovery, or positions taken in the testimony or briefs of other parties.

WHEREFORE, for all the above and foregoing reasons, Walmart, Inc. respectfully requests that the Commission grant it intervenor status as a full party of record, and allow it to fully participate in this case including, without limitation, filing and presenting testimony, cross examination of witnesses, participation in all formal and informal conferences and hearings, and filings of briefs and any other pleadings, to the extent they deem necessary for its full participation herein.

Respectfully submitted,

WALMART, INC.

By Its Attorney,



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Melissa M. Horne, Esq., P41840  
HIGGINS, CAVANAGH & COONEY, LLP  
10 Dorrance Street, Suite 400  
Providence, RI 02903  
Tel: (401) 272-3500  
Fax: (401) 273-8780  
E-mail: mhorne@hcc-law.com  
June 18, 2019

### **CERTIFICATION OF SERVICE**

I certify that on this date copies of this petition were mailed by First-Class Mail to the Commission and filed electronically, and copies were sent electronically to the Commission Staff, the Office of the Consumer Advocate, and parties on the email list in this docket pursuant to Puc 203.17.



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Melissa M. Horne  
Attorney for Walmart, Inc.  
June 18, 2019