

**BEFORE THE MISSISSIPPI PUBLIC SERVICE COMMISSION**

**MISSISSIPPI POWER COMPANY  
EC-120-0097-00**

**DOCKET NO. 2015-UN-80**

**IN RE:**

**NOTICE OF INTENT OF MISSISSIPPI POWER COMPANY FOR  
A CHANGE IN RATES SUPPORTED BY A CONVENTIONAL  
RATE FILING OR, IN THE ALTERNATIVE, BY A RATE  
MITIGATION PLAN IN CONNECTION WITH THE KEMPER  
COUNTY IGCC PROJECT**

**FILED**

**JUN 16 2015**

**MISS. PUBLIC SERVICE  
COMMISSION**

**MOTION TO INTERVENE OF  
WAL-MART STORES EAST, LP, AND SAM'S EAST, INC.**

Pursuant to Rule 6.121 of the Mississippi Public Service Commission's ("Commission") Public Utilities Rules of Practice and Procedure, Wal-Mart Stores East, LP, and Sam's East, Inc. (collectively "Walmart") submit this Motion to Intervene and respectfully request the Commission enter an order permitting their intervention and participation in this proceeding. In support of this Motion Walmart states as follows:

1. Wal-Mart Stores East, LP, is a Delaware limited partnership authorized to do business in the State of Mississippi. Sam's East, Inc., is an Arkansas corporation also authorized to do business in Mississippi. The business address of both entities is:  
Sam M. Walton Development Complex, 2001 SE 10<sup>th</sup> Street, Bentonville, AR 72716-0550.
2. Walmart is a large retail customer of Mississippi Power Company ("MPC"), owning and operating approximately 12 retail stores and related facilities in MPC's Mississippi service territory. Collectively, these facilities consume over 50 million kWh of electricity on an annual basis.

3. On May 15, 2015, MPC filed a Notice of Intent For a Change in Rates (“Notice of Intent”) in this docket. MPC’s Notice of Intent sets forth alternative rate proposals, including a “Traditional Rate Filing” for an initial increase of \$113,042,196 in annual retail revenue requirements, a second proposal for a “2017 Rate Mitigation Filing” for an initial increase of \$24,980,924 in annual retail revenue requirements, and a third proposal for “2019 Rate Mitigation Filing” that would include anticipated securitization of certain Kemper Project costs to be requested later in a separate docket.
4. Changes in the rates and charges for electricity such as those being requested by MPC could directly and substantially affect Walmart’s business and operations in the State of Mississippi. Accordingly, Walmart has a “substantial interest relating to the property, transaction or outcome of the proceeding....” Public Utilities Rules of Practice and Procedure Rule 6.121(1).
5. Further, as a large commercial customer, Walmart’s interests differ from those of other customer groups represented in this proceeding. Given these interests and the unique configuration of its facilities, Walmart “is so situation that the disposition of the proceeding may as a practical matter impair or impede... [Walmart’s] ability to protect that interest.” *Id.* Simply put, Walmart’s interests cannot be adequately represented by any existing or future participant in this proceeding.
6. Allowing Walmart to intervene in this proceeding will serve the public interest by ensuring that the Commission is so apprised of the interests of a large commercial electric customer. Further, because Walmart operates in many different states, it has

substantial and unique insights gained in various states and markets regarding issues in rate setting proceedings.

7. The following persons should be included on the service list in this proceeding, and all communications concerning this matter should be addressed to:

Robert P. Wise  
Sharpe & Wise PLLC  
120 N Congress Street, Suite 902  
Jackson, MS 39201  
Tel: 601-968-5561  
Email: [rwise@sharpewise.com](mailto:rwise@sharpewise.com)

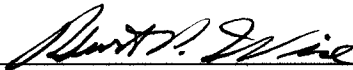
Steve W. Chriss, Senior Manager  
Energy Regulatory Analysis  
Wal-Mart Stores, Inc.  
2001 S.E. 10<sup>th</sup> Street  
Bentonville, AR 72716-0550  
Tel: 479-204-1594  
Email: [Stephen.chriss@wal-mart.com](mailto:Stephen.chriss@wal-mart.com)

WHEREFORE, Wal-Mart Stores East, LP, and Sam's East, Inc., respectfully request that the Commission grant them intervenor status as full parties of record and allow them to fully participate in this Docket including, without limitation, filing and presenting comments and/or testimony, cross examination of witnesses, participation in all formal and informal conferences and hearings, and filings of brief and other pleading, to the extent they deem necessary for their full participation herein.

Dated this the 16<sup>th</sup> day of June, 2015.

Respectfully submitted,

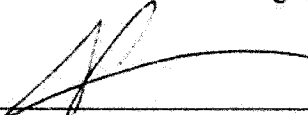
Wal-Mart Stores East, LP, and Sam's East, Inc.

By:   
Robert P. Wise (MSB #7337)  
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Jackson, Mississippi 39201  
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STATE OF ARKANSAS

COUNTY OF Benton

Came before me, the undersigned authority in and for the jurisdiction aforesaid, Steve W. Chriss, Senior Manager, Energy Regulatory Analysis for Walmart Stores, Inc., who stated on oath that the foregoing statements in the Motion to Intervene of Wal-Mart Stores East, LP and Sam's East, Inc. are true and correct to the best of his knowledge, information and belief.

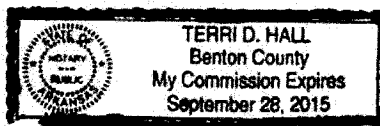
  
\_\_\_\_\_  
Steve W. Chriss  
Senior Manager, Energy Analysis  
Walmart Stores, Inc.

Sworn to and subscribed before me, this the 16<sup>th</sup> day of June, 2015.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

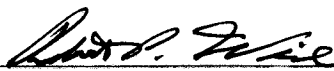
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**CERTIFICATE OF SERVICE**

I, Robert P. Wise, do hereby certify that I have this day caused to be served the foregoing pleading upon all parties of record to this docket on this day via email or U.S. Mail postage prepaid.

This the 16<sup>th</sup> day of June, 2015.

  
\_\_\_\_\_  
Robert P. Wise