



50 West Liberty Street, Suite 750
Reno, Nevada 89501
Main 775.323.1601
Fax 775.348.7250

A Professional
Law Corporation

Justina A. Caviglia
Attorney at Law
Direct 775.789.6559
JCaviglia@parsonsbehle.com

October 8, 2024

Via Electronic Filing

Public Utility Commission of Oregon
Attention: Filing Center
P.O. Box 1088
Salem, Oregon 97308-1088

Re: UE 435 – In the Matter of Portland General Electric, Request for a General Rate Revision

Dear Colleague:

Attached please find Walmart Inc.'s Position Statement to be filed in this docket on behalf of Walmart Inc.

If you have any questions or concerns, please do not hesitate to contact me directly.

Sincerely,

PARSONS BEHLE & LATIMER

/s/ Justina A. Caviglia

Justina A. Caviglia

JAC:rs
Enclosure

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of

Docket No. UE 435

PORTLAND GENERAL ELECTRIC
COMPANY,

Request for a General Rate Revision

WALMART INC.'S POSITION STATEMENT

Pursuant to the Administrative Law Judge's ruling on September 27, 2024, Walmart Inc. ("Walmart") hereby files its position statement based upon Joint Issues List.

Cost of Capital

1. What should be PGE's authorized return on equity?

The Commission should maintain the current 9.50 percent ROE. This rate aligns with the authorized ROEs awarded by this Commission to other investor-owned utilities since 2021.

2. What should be PGE's capital structure?

Walmart does not have a position on PGE's capital Structure.

3. What should be PGE's cost of long-term debt?

Walmart does not have a position on PGE's cost of long-term debt.

Rate Base, Revenues, Compensation, Capital Projects, Constable and Seaside Energy Storage Projects, Non-labor Operations and Maintenance ("O&M") expense, T&D, Taxes, Grants

Walmart does not have a position on rate base (issue nos. 4-7), revenues (issue no. 8), compensation (issue nos. 9-10), capital projects (issue nos. 11-15), Constable and Seaside energy storage projects (issue nos. 16-18), non-labor O&M expense (issue nos. 19-22), T&D (issue nos. 23-26), taxes (issue nos. 27-29), or grants (issue no. 30).

Rate Spread/Rate Design

31. What proposed changes, if any, should apply to the generation marginal cost study?

Walmart does not oppose the Company's continued use of the 4-coincident peak ("4CP") allocation methodology for generation capacity costs and 12-coincident peak ("12CP") method for allocating transmission costs.

32. Should the Commission adopt proposed adjustments to PGE's cap to customer class rate increases? If so a cap and/or floor for customer class rate increases as a percentage of the overall (or average) increase? If so, what should be the parameters?

Walmart does not have a position on PGE's cap to customer class rate increases.

33. Should the Commission adopt PGE's revisions to the Customer Impact Offset (CIO) to equalize the distribution charge for lighting schedules?

Walmart does not have a position on PGE's revisions to the CIO.

34. Should the Commission adopt PGE's proposed increase to its residential basic charge?

Walmart does not have a position on PGE's proposed increase to its residential basic charge.

35. Has PGE established that its proposed revisions to the load following credit for Schedule 90 are warranted?

Walmart does not have a position on the proposed revisions to Schedule 90.

36. Should PGE be required to apply Time of Use (TOU) to Schedule 90 customers?

Walmart does not have a position on the proposed revisions on a potential Schedule 90 TOU.

Transportation Line Extension Allowance, Transportation Electrification & PGE Fleet

Walmart does not have a position on transportation line extension allowance (issue no. 37), or transportation electrification and PGE's fleet (issue nos. 38-39).

Customer Service Issues

40. What other party proposals, if any, related to bill design, and sharing of information with customers should the Commission require? If so, should the Commission adopt CUB's proposed disallowance related to billing information?

Walmart does not have a position on other party proposals regarding bill design or sharing information with customers.

41. What adjustments, if any, should be made to the amount proposed by PGE for non-labor Customer Accounts O&M?

Walmart does not have a position on adjustments to non-labor Customer Accounts O&M.

42. What adjustments, if any, should be made to the amount proposed by PGE for Key Customer Management Labor O&M?

Walmart does not have a position on adjustments to Key Customer Accounts Labor O&M. However, Walmart values the Company's key account program and supports the efforts of this team. While not a specific recommendation, Walmart describe the valuable service provided to Walmart by the Company's key account management team in the testimony of Lisa Perry.

Affordability, Income Qualified Bill Discount and other Environmental Justice Issues and Other issues.

Walmart does not have a position on affordability, income qualified bill discount, other environmental justice issues (issue nos. 43-54) or other issues (issue nos. 55-65).

DATED this 8th day of October, 2024.

PARSONS BEHLE & LATIMER

/s/ Justina A. Caviglia
JUSTINA A. CAVIGLIA
WSBA No. 52402
Nevada Bar No. 9999
50 West Liberty Street, Suite 750
Reno, Nevada 89501
Telephone: 775.323.1601
jcaviglia@parsonsbehle.com
Attorneys for Walmart, Inc.