

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: NATIONAL GRID'S RATE DESIGN PLAN

DOCKET NO. 4568

NOTICE OF APPEARANCE OF COUNSEL

Pursuant to Rule 1.4 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, please enter my appearance on behalf of Wal-Mart Stores East, LP and Sam's East, Inc.

Respectfully submitted,

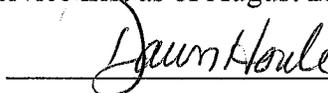


Melissa M. Horne, Esq.
Higgins, Cavanagh & Cooney, LLP
123 Dyer Street
Providence, RI 02903
401-272-3500
mhorne@hcc-law.com

Dated: August 25, 2015

CERTIFICATE OF SERVICE

I hereby certify that on the ~~25~~^{25th} day of August, 2015, I mailed this original pleading and 10 copies to the Public Utilities Commission and sent a true copy of the document by electronic mail or first-class mail to the parties Docket 4568 Service List as of August 25, 2015.



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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IN RE: NATIONAL GRID'S RATE DESIGN PLAN

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

Wal-Mart Stores East, LP and Sam's East, Inc. ("Walmart"), by its attorneys, move to intervene in the above-captioned proceeding pursuant to Rule 1.13 of the Rhode Island Public Utilities Commission Rules of Practice and Procedure ("Rules"). In support of this motion, Walmart states:

1. Walmart has the privilege of providing retail services in the State of Rhode Island and has approximately 10 stores and related facilities that are served by National Grid. As a customer of National Grid, Walmart purchases more than 25 million kWh of electricity annually, making electricity one of its largest operational costs in Rhode Island.

2. Rule 1.13(b) permits any person claiming "an interest of such nature that intervention is necessary or appropriate to submit a motion to intervene in any proceeding before the [PUC]."

3. Rule 1.13(e) provides that where there is no objection to intervention, a properly filed and served motion to intervene shall be granted.

4. It is necessary and appropriate to grant Walmart's motion to intervene because Walmart has an interest that is directly and significantly affected by this proceeding which is not adequately represented by existing parties.

WHEREFORE, for the reasons stated herein, Walmart respectfully requests that the Rhode Island Public Utilities Commission grant this motion and allow Walmart to intervene.

Please direct service of any correspondence or pleadings in connection with this

proceeding to:

Melissa M. Horne, Esq.
Higgins, Cavanagh & Cooney, LLP
123 Dyer Street
Providence, RI 02903
(401) 272-3500 telephone
(401) 273-8780 facsimile
mhorne@hcc-law.com

Stephen W. Chriss
Sr. Manager, Energy Regulatory Analysis
Walmart
2001 Southeast 10th St.
Bentonville, AR 72716-5530
(479) 204-1594 telephone
Stephen.chriss@walmart.com

Respectfully Submitted,

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

By their Attorney,



Melissa M. Horne, Esq.
Higgins, Cavanagh & Cooney, LLP
123 Dyer Street
Providence, RI 02903
Tel: (401) 272-3500
Fax: (401) 273-8780

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