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April 16, 2012

Honorable Jaclyn A. Brillling
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223

RE: Case 03-E-0188: Proceeding on Motion of the Commission Regarding a Retail Renewable Portfolio Standard.

Dear Secretary Brillling:

On February 14, 2012, the New York State Energy Research and Development Authority (“NYSERDA”) filed a *Petition for Expansion of RPS Customer-Sited Tier Photovoltaics Program* (“Petition”) in the above-referenced proceeding. As both a major consumer of electricity at its one hundred and nine stores and three distribution centers located throughout New York State and a staunch proponent of energy sustainability, Wal-Mart Stores, Inc. (“Wal-Mart”) has a substantial interest in New York energy policies regarding renewable generation. Wal-Mart respectfully submits these comments in support of NYSERDA’s Petition.

In his 2012 State-of-the-State address, Governor Cuomo identified New York State as a leader in cost-effective, renewable generation. To expand and diversify New York’s renewable portfolio, Governor Cuomo advanced the NY Sun Initiative as a means of significantly expanding the state’s solar energy production. Among other things, the NY Sun Initiative will attempt to increase competitive procurement of large, commercial-sized solar projects.

Wal-Mart is also firm believer in the goals driving the RPS programs. The Company is continually seeking innovative ways to reduce greenhouse gases at existing stores, clubs and distribution centers around the world; designing new prototype stores to be more efficient; and developing and implementing innovative energy efficient technologies into its existing and new stores. Taking wasteful energy out of its operations contributes significantly towards Wal-Mart’s goal of maintaining everyday low prices for its customers.

Wal-Mart is also dedicated to the development of renewable resources. The Company’s long-term aspirations include procurement of 100 percent renewable energy, creating zero waste and selling products that sustain resources and the environment. To further its aspirations, Wal-

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Mart currently has over three-hundred renewable energy projects either completed or in the permitting, design or construction phase.

To date, restrictive program parameters, such as generation size limitations and renewable energy credit ownership issues, have made difficult to expand their renewable energy installations in some areas of the country. Recent initiatives by NYSERDA, however, such as the instant Petition and the roll-out of the Geobalancing Program, will help remove these impediments. The overall objectives of the RPS programs closely align with those of the Company and, given Wal-Mart's presence throughout the state, the Company is optimistic that there will soon be opportunities to partner with NYSERDA. For these reasons, Wal-Mart supports NYSERDA's Petition.

Wal-Mart appreciates the opportunity to comment on NYSERDA's Petition and looks forward to working with NYSERDA and other parties to advance and achieve Wal-Mart's and New York State's renewable goals.

Very truly yours,

/s/

Steven D. Wilson

cc: Angie Beehler
Ken Baker