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JUN 28 2011

PUBLIC SERVICE
COMMISSION

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June 28, 2011

Mr. Jeff Derouen, Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, KY 40602-0615

David C. Brown
(502) 681-0421
(502) 779-8251 FAX
dbrown@stites.com

RE: LGE and KU DSM Application – Case No. 2011-00134

Dear Mr. DeRouen:

Enclosed for filing in the above styled docket are original and ten (10) copies of the Supplemental Data Request of The Kroger Co.

Please place this document of file.

Very truly yours,


David C. Brown

DCB/dab

Enclosure

KR091:00KR4:840014:1:LOUISVILLE

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:)
)
JOINT APPLICATION OF LOUISVILLE)
GAS AND ELECTRIC COMPANY AND)
KENTUCKY UTILITIES COMPANY FOR)
REVIEW, MODIFICATION, AND)
CONTINUATION OF EXISTING, AND)
ADDITION OF NEW, DEMAND SIDE)
MANAGEMENT AND ENERGY-)
EFFICIENCY PROGRAMS)

Case No. 2011-00134

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**PUBLIC SERVICE
COMMISSION**

**SUPPLEMENTAL
DATA REQUESTS OF
THE KROGER CO.**

The Kroger Co. requests the applicants, Louisville Gas and Electric Company and Kentucky Utilities Company, to respond to the Supplemental Data Requests in accordance with the Order of Procedure entered herein.

DEFINITIONS

1. "Document(s)" is used in its customary broad sense and includes all written, typed, printed, electronic, computerized, recorded or graphic statements, communications or other matter, however produced or reproduced, and whether or not now in existence, or in your possession.

2. "Study" means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, on a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.

3. If any document requested herein was at one time in existence, but has been lost, discarded or destroyed, identify such document as completely as possible, including the type

of document, its date, the date or approximate date it was lost, discarded or destroyed, the identity of the person (s) who last had possession of the document and the identity of all persons having knowledge of the contents thereof.

4. "You" or "your" means the person whose filed testimony is the subject of these requests and, to the extent relevant and necessary to provide full and complete answers to any request, "you" or "your" may be deemed to include any person with information relevant to any request who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness' testimony.

5. "LG&E"- means Louisville Gas & Electric Company, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

6. "KU" – means Kentucky Utilities Company, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

7. "Companies" – means LG&E and KU.

8. "Stipulation and Recommendation" – means the Stipulation and Recommendation dated June 7, 2010 and approved by the Public Service Commission by Order dated July 30, 2010 in Case No. 2009-00548 and Case No. 2009-00549.

INSTRUCTIONS

1. The Requests shall be deemed continuing so as to require prompt further and supplemental production if at any time during this proceeding in the event you locate or obtain possession, custody or control of additional responsive documents.

2. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this proceeding should be provided as soon as they are

completed. You are obliged to change, supplement and correct all answers to these Requests to conform to available information, including such information as it first becomes available to you after the answers hereto are served.

3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.

4. The answers should identify the person(s) supplying the information.

5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

Supplemental Data Requests of the Kroger Co.

1. Please refer to Exhibit MEH-1, Commercial Incentives (p. 26), and confirm that the following energy reduction programs by a large commercial customer would qualify:

(a) LIGHTING

(i) Replace existing lighting in walk-in coolers and freezers with light-emitting diodes (LEDs).

(ii) Replace existing fluorescent lighting in refrigerated fresh meat cases with light-emitting diodes (LEDs).

(b) REFRIGERATION - Replace evaporator and condenser shaded pole motors with fractional horsepower Electronically Commutated Motors (ECMs).

(c) OTHER - Replace existing wrapper-sealer machines with a new energy-efficient model in all service departments.

2. Please refer to Section 5.11 of the Stipulation and Settlement. Assuming the proposed Commercial Incentives program is approved, will Lighting retrofit projects installed in 2011 prior to the entry of the final Order in this docket be eligible for incentives?

3. Please refer to Exhibit MEH-1, Commercial Incentives, Section 2.7 (p. 29):

(a.) Is the proposed \$50,000 maximum annual benefit per facility the maximum amount that can be collected from each offered program, or is that an annual maximum benefit for all programs in a given year?

(b.) Does the provision calling for a \$100,000 maximum recovery over two years (if no monies are recovered in the first year) assume that a program only runs for two years? If a program runs for more than two years, will the customer be able to apply the same concept? If the customer is not entitled to the maximum benefit in the first two years, will it be able to recover up to the maximum benefit in subsequent years? Can the customer recover \$150,000 in the third year of a program if it did not collect any monies in the prior two years?

(c.) Please explain how the incentive amount of \$100 per kW was determined?

4. Relative to the Commercial Incentives program for each utility:

(a.) Will each utility provide a list of approved LED fixtures? If not, will specific certifications be required? Please explain.

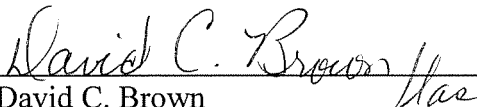
(b.) Many of the Kroger energy reduction projects are time sensitive in that they must be completed within internally specified timeframes. Please describe the application, pre-inspection and approval process under the Commercial Incentives program in terms of process and, in particular, timing? How long will the approval process take?

(c.) Will application approval be required prior to equipment purchase?

(d.) How long after project approval does the customer have to complete the projects?

(e.) If an energy reduction project is not completed within the companies' time parameters, what will be the process of obtaining project extensions from the companies and the timeframes within which they will be granted?

(f.) Once projects are completed, please state the estimated time period for post-inspection and in particular the receipt of payment?



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Counsel for The Kroger Co.

CERTIFICATE

I hereby certify that a copy of the foregoing was served by email on counsel for the Joint Applicants and by mailing a true and correct copy, by regular U.S. mail to counsel for the Applicant and all intervening parties on this the 28th day of June, 2011:

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