

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE ENERGY )	
KENTUCKY, INC. FOR (1) AN ADJUSTMENT OF )	
ELECTRIC RATES; (2) APPROVAL OF NEW )	CASE NO.
TARIFFS; (3) APPROVAL OF ACCOUNTING )	2022-00372
PRACTICES TO ESTABLISH REGULATORY )	
ASSETS AND LIABILITIES; AND (4) ALL OTHER )	
REQUIRED APPROVALS AND RELIEF )	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO WALMART, INC.

Walmart, Inc. (Walmart), pursuant to 807 KAR 5:001E, is to file with the Commission an electronic version of the following information. The information requested is due on April 7, 2023. The Commission directs Walmart to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Walmart shall make timely amendment to any prior response if Walmart obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Walmart fails or refuses to furnish all or part of the requested information, Walmart shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Walmart shall, in accordance with 807 KAR 5:001E, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Steve Chriss (Chriss Testimony). Provide the analysis conducted leading to Walmart's conclusion that the CEC Program is in the public interest. Provide the analysis in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible.

2. Provide an analysis either supporting Duke Energy Kentucky's calculation of CEC Program bill credits or supporting an alternative method to calculate the CEC Program bill credits.

3. Identify the electric utilities in other states where Wal-Mart operates that utilize a similar CEC Program and explain how those programs have been implemented.



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DATED   MAR 23 2023  

cc: Parties of Record

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