

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

**In The Matter of:**

<b>APPLICATION OF KENTUCKY UTILITIES</b>	)	<b>CASE NO. 2012-00221</b>
<b>COMPANY FOR AN ADJUSTMENT OF ITS</b>	)	
<b>ELECTRIC RATES</b>	)	

**FIRST SET OF  
DATA REQUESTS  
OF THE KROGER COMPANY**

The Kroger Company requests the applicant, Kentucky Utilities Company, to respond to the First Set of 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. "KU" means Kentucky Utilities Company, and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

### 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.

**First Set of Data Requests of The Kroger Co.**

1. Please provide an electronic copy of all workpapers utilized in the preparation of the Company's direct testimony and exhibits of the witnesses listed below. In your responses please include an electronic copy of rate design and cost of service models in Excel-compatible format with all working formulas included.

- (a) Kent Blake
- (b) Lonnie Bellar
- (c) Valerie Scott
- (d) Robert Conroy
- (e) Shannon Charnas
- (f) John Spanos
- (g) Dan Arbough

2. Please refer to KU Witness Blake's Exhibit 1, Schedule 1.09. Please provide the Off-System Sales Margins by month for 2012 using the latest information available. Please provide this calculation in Excel format.

3. Please refer to KU Witness Blake's Exhibit 1, Schedule 1.09. Please provide the Off-System Sales Margins for the last five calendar years. Please provide this calculation in Excel format.

4. Please refer to KU Witness Blake's Exhibit 1, Schedule 1.15. By including the test period (12 months ending March, 2012) in the ten year average, does KU agree that it may have double weighted some storm damage expenses that are already included in the calendar year 2011 data? Please explain why the proposed averaging does not double count these expenses.

5. Please refer to KU Witness Blake's Exhibit 1, Schedule 1.15. Please recalculate the ten year storm damage average expense using the ten years covering 2002 - 2011. Please provide this calculation in Excel format with formulas intact.

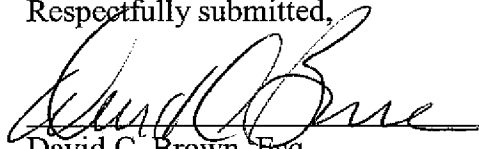
6. Please refer to KU Witness Blake's Exhibit 1, Schedule 1.16. By including the test period (12 months ending March, 2012) in the ten year average, does KU agree that it may have double

weighted some injury and damages expenses that are already included in the calendar year 2011 data?

Please explain why the proposed averaging does not double count these expenses.

7. Please refer to KU Witness Blake's Exhibit 1, Schedule 1.16. Please recalculate the ten year injury and damages average expense using the ten years covering 2002 - 2011. Please provide this calculation in Excel format with formulas intact..

Respectfully submitted,



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**COUNSEL FOR THE KROGER COMPANY**

## CERTIFICATE OF COMPLIANCE

In accordance with Ordering Paragraph No. 10 of the Commission's June 22, 2012 Order, this is to certify that Kroger's July 19, 2012 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on July 31, 2012; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; that an original and one copy of the filing is being mailed to the Commission on July 31, 2012; and that on July 31, 2012; electronic mail notification of the electronic filing will be provided to the following:

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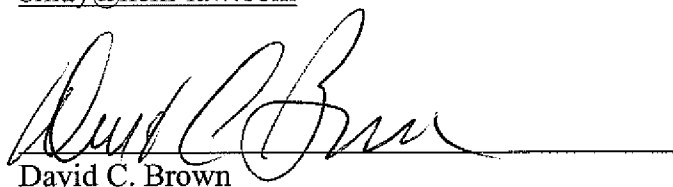
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