

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

In the Matter of:

**APPLICATION OF LOUISVILLE GAS AND) CASE NO. 2012-00222
ELECTRIC COMPANY FOR AN ADJUSTMENT)
OF ITS ELECTRIC AND GAS BASE RATES, A)
CERTIFICATE OF PUBLIC CONVENIENCE AND)
NECESSITY, APPROVAL OF OWNERSHIP OF)
GAS SERVICE LINES AND RISERS, AND A GAS)
LINE SURCHARGE)**

RESPONSE OF THE KROGER CO. TO

FIRST DATA REQUEST OF

ATTORNEY GENERAL

(REDACTED VERSION)

LOUISVILLE GAS & ELECTRIC COMPANY

CASE NO. 2012-00222

**Response of The Kroger Co. to the
First Data Request Of Attorney General**

Responding Witness: Kevin C. Higgins for all Items

Item 1-1. Please state under what tariff(s) Kroger takes service from LG&E.

Response: Kroger takes the majority of its service under the Commercial Time-of-Day Secondary Service (CTODS) rate schedule.

Item 1-2. Please provide cumulative (all locations) base rate charges (total, customer, energy and demand individually), for each month of the historic test year used by LG&E in this proceeding.

Response: 1-2. Monthly base rate charges by individual billing component during the test year are not available without a special study being performed. For reference, approximately 1.2% of Kroger's current base rates are attributable to the basic service charge, 44% to demand charges, and 54.8% to the energy charge. The table below presents Kroger's total electricity cost for each month of the test year.

Apr-11	
May-11	
Jun-11	
Jul-11	
Aug-11	
Sep-11	
Oct-11	
Nov-11	
Dec-11	
Jan-12	
Feb-12	
Mar-12	

Item 1-3. Please provide the total KWh energy used by Kroger for each month of the historic test year used by LG&E in this proceeding.

Response: The table below presents the total kWh energy used by Kroger during each month of the test year.

Apr-11	
May-11	
Jun-11	
Jul-11	
Aug-11	
Sep-11	
Oct-11	
Nov-11	
Dec-11	
Jan-12	
Feb-12	
Mar-12	

Item 1-4. Please provide an estimate of the impact on Kroger's total electric charges (all locations) if LG&E's proposals (revenue requirement, class revenue allocations, and rate design) are approved as filed and updated.

Response: 1-4. Kroger estimates that LG&E's proposal would result in an annual increase of approximately ■% to Kroger.

Item 1-5. Please provide by each service location for the test year the billing determinants (the number of bills, kWh, and billed kW). Please provide the information in electronic format whether Excel or otherwise with cells intact.

A 1-5. Please see the attachment, Kroger_AG_Att_1-005 (LG&E) for the requested information. The attachment is filed subject to a Petition for Confidentiality.

**ATTACHMENT KROGER_AG_ATT_1-005
(LGE)**

**FILED PURSUANT TO PETITION FOR
CONFIDENTIAL TREATMENT**

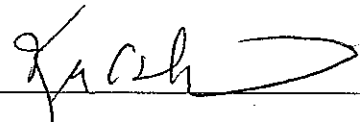
Item 1-6. Please provide the time, date, and level of actual maximum demand (kW) for each service location during the test year. Please provide the information in electronic format whether Excel or otherwise with cells intact.

Response: 1-6. Kroger not does know the time and date of actual maximum demand during the test year. Please see the attachment, Kroger_AG_Att_1-005 (LG&E), which contains the monthly maximum demand for the service locations for which this data is available.

VERIFICATION

STATE OF UTAH)
) SS:
COUNTY OF SALT LAKE)

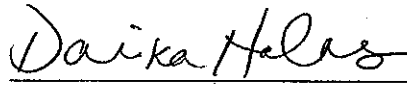
The undersigned, **Kevin C. Higgins**, being duly sworn, deposes and says he is a Principal of Energy Strategies, LLC, that he has personal knowledge of the matters set forth in responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Kevin C. Higgins

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 22ND day of October 2012.



 (SEAL)

Notary Public

My Commission Expires:
02.07.2015