

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) **Case No. 2014-00003**
Review, Modification, and Continuation of)
Existing, and Addition of New, Demand-Side)
Management and Energy Efficiency Programs)

**MOTION OF WAL-MART STORES EAST, LP, AND SAM'S EAST, INC.,
FOR LEAVE TO FILE SUPPLEMENTAL DIRECT TESTIMONY**

Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart"), hereby move the Public Service Commission ("Commission") to grant Walmart leave to file Supplemental Direct Testimony in this case by no later than May 30, 2014.

Walmart previously submitted and served upon the parties the written Direct Testimony of Kenneth E. Baker on May 6, 2014. Subsequent to that filing, Walmart became aware of information relevant to Walmart's participation in demand response programs offered by the Louisville Gas and Electric Company and Kentucky Utilities Company (together, the "Companies"). Walmart believes it appropriate to clarify its testimony in that narrow regard.

Walmart does not believe that allowing this limited Supplemental Direct Testimony will prejudice the Commission's investigation, the current procedural schedule, or other parties. Walmart believes such testimony will amplify the record for the Commission. Further, Walmart understands that the Companies do not object to this Motion. In addition, Walmart represents that it does not object to the Companies' Motion to file Rebuttal Testimony (submitted on May 7, 2014), in part as this would allow the Companies an opportunity to respond to Walmart's Supplemental Direct Testimony, as they deem necessary.

WHEREFORE, Wal-Mart Stores East, LP and Sam's East, Inc., respectfully move the Commission for Leave to file Supplemental Direct Testimony on May 30, 2014.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC



By _____

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Dated: May 23, 2014

CERTIFICATE OF SERVICE

I hereby certify that Walmart's May 23, 2014, electronic filing is a true and accurate copy of the Motion of Wal-Mart Stores East, LP and Sam's East, Inc. ("Walmart") for Leave to File Supplement Direct Testimony to be filed in paper medium; and that on May 23, 2014, the electronic filing has been transmitted to the Commission, and that an original and one copy of the filing will be delivered to the Commission, that no participants have been excused from electronic filing at this time, and electronic mail notification of the electronic filing is provided to the following:

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Certificate of Service

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