## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

~				0
100	tha	N /	[atter	At.
111	THE	IV	allei	UL.

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 April 14, 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

Don C. A. Parker (Kentucky I.d. No. 94113)

Tai C. Shadrick

Spilman Thomas & Battle, PLLC

300 Kanawha Blvd, East

Charleston, WV 25301 Phone: (304) 340-3896

Fax: (304) 340-3801

E-mail: dparker@spilmanlaw.com

tshadrick@spilmanlaw.com

Derrick Price Williamson Spilman Thomas & Battle, PLLC 1100 Bent Creek Blvd., Suite 101 Mechanicsburg, PA 17050

Phone: (717) 795-2740 Fax: (717) 795-2743

E-mail: dwilliamson@spilmanlaw.com

Counsel to Wal-Mart Stores East, LP and Sam's East, Inc.

Dated: May 28, 2014

## CERTIFICATE OF SERVICE

I hereby certify that Walmart's May 28, 2014, electronic filing is a true and accurate copy of the Notice of Correction and corrected 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 28, 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:

Dennis G. Howard II, Esq.
Lawrence W. Cook, Esq.
Angela M. Goad, Esq.
Heather Napier, Esq.
Office of the Attorney General
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601-8204
Dennis.Howard@ag.ky.gov
Larry.Cook@ag.ky.gov
Angela.Goad@ag.ky.gov
Heather.Napier@ag.ky.gov

Allyson K. Sturgeon, Esq. Senior Corporate Attorney LG&E and KU Energy, LLC 220 West Main Street Louisville, KY 40202 Allyson.Sturgeon@lge-ku.com

and
Kendrick R. Riggs, Esq.
W. Duncan Crosby, III, Esq.
Joseph T. Mandlehr, Esq.
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, KY 4020
Kendrick.riggs@skofirm.com
Duncan.crosby@skofirm.com
Joseph.mandlehr@skofirm.com

Counsel for LG&E and KU Energy, LLC

Rick Lovekamp
Manager Reg. Affairs
LG&E and KU Energy, LLC
220 West Main Street
Louisville, KY 40202
Rick,Lovekamp@lge-ku.com

Edwin R. Staton
Vice President, State Regulation and Rates
LG&E and KU Energy, LLC
220 West Main Street
Louisville, KY 40202
Ed.Staton@lge-ku.com

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@BKLlawfirm.com
kboehm@BKLlawfirm.com
jkylercohn@BKLlawfirm.com
Counsel to Kentucky Industrial Utility
Customers, Inc.

Joe F. Childers, Esq.
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, KY 40507
childerslaw81@gmail.com
and
Jill Tauber
Earthjustice
1625 Massachusetts Avenue NW, Suite 702
Washington, DC 20036-2212
jtauber@earthjustice.org
and
Matthew Gerhart
Earthjustice
705 Second Ave., Suite 203

Earthjustice 705 Second Ave., Suite 203 Seattle, WA 98104 and Certificate of Service Page 2

Susan Laureign Williams, Esq.
Sierra Club
50 F Street, NW, 8<sup>th</sup> Floor
Washington, DC 20001
laurie.williams@sierraclub.com
Counsel to Wallace McMullen and Sierra
Club

Iris G. Skidmore, Esq.
Bates & Skidmore
Attorneys at Law
415 W. Main St., Suite 2
Frankfort, KY 40601
Batesandskidmore@gmail.com
Counsel for Community Action Council

Eileen Ordover, Esq.
Lisa Kilkelly, Esq.
Legal Aid Society, Inc.
416 W. Muhammad Ali Blvd., Suite 300
Louisville, KY 40202
EOrdover@laslou.org
LKilkelly@laslou.org
Counsel for Association of Community
Ministries, Inc.

Don C. A. Parker (Kentucky I.d. No. 94113)

Dated: May 28, 2014