

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

**In the Matter of:**

<b>APPLICATION OF KENTUCKY UTILITIES</b>	)	
<b>COMPANY FOR AN ADJUSTMENT OF ITS</b>	)	<b>CASE NO. 2014-00371</b>
<b>ELECTRIC RATES</b>	)	

**DATA REQUESTS OF**  
**KENTUCKY UTILITIES COMPANY**  
**PROPOUNDED TO WAL-MART STORES EAST, LP AND SAM’S EAST, INC.**

Kentucky Utilities Company (“KU”) respectfully submits the following data requests to Wal-Mart Stores East, LP and Sam’s East, Inc. (“Wal-Mart”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 12, 2014.

**Instructions**

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, Wal-Mart, its witnesses, or its counsel.
2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.
3. These requests shall be deemed continuing so as to require further and supplemental responses if Wal-Mart receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If Wal-Mart objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of Wal-Mart, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

## Data Requests

1. KRS 278.285(3) states:

The commission shall assign the cost of demand-side management programs only to the class or classes of customers which benefit from the programs. The commission shall allow individual industrial customers with energy intensive processes to implement cost-effective energy efficiency measures in lieu of measures approved as part of the utility's demand-side management programs if the alternative measures by these customers are not subsidized by other customer classes. Such individual industrial customers shall not be assigned the cost of demand-side management programs.

- a. Is Wal-Mart aware of any jurisdiction in the United States other than Kentucky that uses the term “industrial” in statutes or regulations to classify customers for any DSM or energy-efficiency program purpose?
  - b. If so, please provide a list of the relevant jurisdictions and relevant specific statutory or regulatory citations and quotations for each such jurisdiction, as well as any related definition of “industrial” provided in statute, regulation, judicial opinion, or administrative-agency order.
2. If not addressed fully in response to Question No. 1 above, is Wal-Mart aware of any jurisdiction in the United States other than Kentucky that uses the term “industrial” in statutes or regulations to classify customers for DSM or energy-efficiency program purposes and that, like KRS 278.285(3), differentiates between industrial customers with energy-intensive processes and industrial customers without energy-intensive processes?
    - a. If so, please provide a list of the relevant jurisdictions and relevant specific statutory or regulatory citations and quotations for each such jurisdiction.
3. How many of Wal-Mart’s 31 locations taking service from Kentucky Utilities Company have or are participating in the Company’s DSM-EE programs?
    - a. What is the total value of the DSM-EE measures, services, or rebates Wal-Mart has received from Kentucky Utilities Company?
    - b. How much electric energy did Wal-Mart purchase from Kentucky Utilities Company in calendar year 2014? Please provide the amount purchased for each location and the total amount purchased across all Wal-Mart locations taking service from Kentucky Utilities Company.

Mr. Chriss

4. With respect to Mr. Chriss's statement at page 8 that including CWIP in rate base "shifts the risks to ratepayers:"
  - a. Please provide a complete explanation detailing the risks that Mr. Chriss believes are shifted to ratepayers.
  - b. Please provide copies of all source documents or other materials relied on by Mr. Chriss to support his belief that including CWIP in rate base "shifts the risks to ratepayers."
  - c. Please provide copies of all documents indicating that the investment community or common stock investors share Mr. Chriss's view that including CWIP in rate base "shifts the risks to ratepayers."
  - d. Please provide all studies, analyses, or other document reviewed by Mr. Chriss that quantify the extent to which other utilities are permitted to include CWIP in rate base.
  - e. Please provide all studies, analyses, or other documents prepared by or relied on by Mr. Chriss that quantify the impact of the risks identified in subpart (a) on the cost of equity to Kentucky Utilities Company

Dated: March 23, 2015

Respectfully submitted,



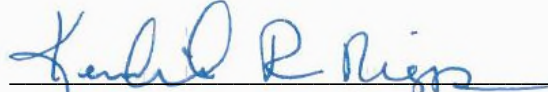
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*Counsel for Kentucky Utilities Company*

**CERTIFICATE OF COMPLIANCE**

This is to certify that Kentucky Utilities Company's March 23, 2015 electronic filing of the Data Requests is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 23, 2015; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Data Requests is being mailed, by first class United States mail, postage prepaid, to the Commission on March 23, 2015.

  
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*Counsel for Kentucky Utilities Company*