

WAL-MART STORES EAST, LP, AND SAM'S EAST, INC.

CASE NO. 2014-00371

**Response to Kentucky Utilities Company's Initial Data Requests
Dated March 23, 2015**

Question No. 3

Responding Witness: Counsel

Q. 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.

A. 3. Objection. The response to this question would require Walmart to provide information to Kentucky Utilities Company ("the Company") that is already available to the Company. As such, the response would not provide any new, relevant evidence. Further, the response may be privileged to the extent that it could reveal elements of Walmart's competitive strategy for participating in utility-sponsored DSM-EE programs. In addition, the response to the question (the number of Walmart accounts participating in DSM-EE programs) is not relevant to the Commission's inquiry regarding whether the Company's use of NAICS codes to define "industrial" customers within its tariff is reasonable; whether and how many Walmart accounts participate in DSM-EE programs offered by the Company is of no consequence to the determination to be made by the Commission. Without waiver of these objections, Walmart will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response.

- a. Objection. The response to this question may be privileged to the extent that it could reveal elements of Walmart's competitive strategy for and results realized from participating in utility-sponsored DSM-EE programs. Further, the term "total value" as reflected in the question is imprecise and undefined and as such is overly broad. In addition, the response to the question (the value of Walmart's participation in DSM-EE programs) is not relevant to the Commission's inquiry regarding whether the Company's use of NAICS codes to define "industrial" customers within its tariff is reasonable; the value Walmart may realize in participating in DSM-EE programs offered by the Company is of no consequence

to the determination to be made by the Commission. Without waiver of these objections, Walmart will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response.

- b. Objection. The response to this question would require Walmart to provide information to the Company that is already available to the Company. As such, the response would not provide any new, relevant evidence. Without waiver of this objection, Walmart will produce responsive non-privileged information in accordance with the Commission's procedural schedule that has been identified within the time permitted for this response.

CERTIFICATE OF SERVICE

I hereby certify that Walmart's March 31, 2015, electronic filing of their Objections is a true and accurate copy of the same document to be filed in paper medium; and that on March 31 2015, 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 served upon the following via Electronic Mail:

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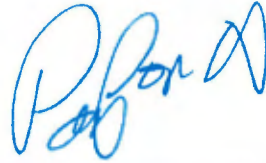
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