

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF KENTUCKY
UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS
ELECTRIC AND GAS RATES AND FOR CERTIFICATES
OF PUBLIC CONVENIENCE AND NECESSITY**

CASE NO. 2016-00370

**THE KROGER COMPANY'S SUPPLEMENTAL REQUESTS FOR INFORMATION TO
KENTUCKY UTILITIES COMPANY**

The Kroger Company ("Kroger"), by and through counsel, submits the following Supplemental Requests for Information to Kentucky Utilities Company ("KU"):

1. Please provide KU's responses to other parties' requests for information in this proceeding that contain confidential information, including any confidential attachments provided with KU's responses. This is an ongoing request. Kroger, its expert and counsel, are willing to provide KU with an appropriate non-disclosure agreement.
2. Please provide the workpapers, in Excel format with formulas intact, that derive KU's proposed rates for each rate schedule. The workpapers provided in response to this Request for Information should show how each proposed rate component was derived, including the underlying cost basis or revenue target for each component, if applicable. These workpapers should show how KU arrived at its proposed Demand Base, Intermediate and Peak rate components for applicable rate schedules, demonstrating the relationship of Demand Base charges to transmission and distribution-related costs, and Demand Intermediate and Peak charges to generation fixed costs, as described in the Direct Testimony of William Steven Seelye, page 40. Att_KU_PSC_1-53_ElecScheduleM_Forecasted,

provided in KU's response to Commission Staff's First Requests for Information, Nos. 1-53, does not appear to show the derivation of proposed rates, as the rates consist largely of pasted values.

3. Please refer to KU's response to KIUC's First Set of Data Requests, Nos. 1-18.
 - (a) Has KU eliminated the Net Income goal in its incentive compensation plan effective in 2017? If not, please provide the percentage weighting applicable to the Net Income goal in 2017.
 - (b) Does KU anticipate including a Net Income goal in its incentive compensation plan in 2018? If so, please provide the percentage weighting that KU anticipates applying to the Net Income goal in 2018.
 - (c) Are the amounts provided in response to KIUC's First Set of Data Requests Nos. 1-18 Total Company or Kentucky Jurisdictional amounts? If the former, please provide the Kentucky Jurisdictional Amounts for each goal. If the latter, please provide the Total Company amounts for each goal.
 - (d) Please provide the workpapers, in Excel format with formulas intact, that derive KU's Test Period incentive compensation expense as presented in KU's response to KIUC's First Set of Data Requests, Nos. 1-18, including the derivation of the expense applicable to each goal.
4. Please refer to KU's Attachment to Response to the Attorney General's Initial Data Requests, Question No. 210. Do the goal weightings presented in the "TIA CALCULATION EXAMPLE" on page 4 represent the actual 2017 incentive compensation plan goal weightings? If not, please provide the 2017 weighting for each incentive compensation goal.

5. For the Forecasted Test Period, for KU rate schedules TODS, TODP, RTS, and FLS, separately, please provide the following information:

- (a) The number of customers whose primary source of power is their own generating resources.
- (b) The kWh sales supplied by the Company to customers whose primary source of power is their own generating resources.
- (c) The Demand Base billing kW (assuming a 100% ratchet) applicable customers whose primary source of power is their own generating resources.

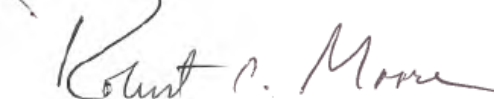
If the Company does not possess this information, please provide the Company's best estimate.

6. Please refer to KU's response to KIUC's First Set of Data Requests, Nos. 1-27.

- (a) Please provide the information in the Attachment to the Response of KU to KIUC's First Set of Data Requests, Question No. 27 in Excel format.
- (b) Please explain the difference between the assets listed in parts 1A-8A and those in 1B-8B.
- (c) Does the Annual Activity column in the Forecast Base Period (3/16 - 2/17) and Forecast Test Period (7/17 - 6/18) sections represent the net of additions/deductions to the regulatory asset and amortization in the period?
- (d) Please provide the Annual Activity and Amortization separately for Forecast Base Period (3/16 - 2/17) and Forecast Test Period (7/17 - 6/18), in the same format as this information is presented for the 2012 through 2016 periods.

7. Please provide the information provided in KU's Attachment to Response to KIUC-1 Question No. 34 in Excel format.
8. Please refer to Schedule D-1, lines 32, 33, 56, and 57. Please explain in detail what constitutes a major generator overhaul and a major turbine overhaul as contemplated in these adjustments to the base period.
9. For each year 2012 through 2016, please provide in Excel format, by generating unit and FERC account, the actual major generator and major turbine overhaul expense incurred, on a Total Company and Kentucky jurisdictional basis. If actual data is not yet available for 2016, please provide the Company's best estimate.
10. For the Base Period and Forecasted Test Period separately, please provide in Excel format, by generating unit and FERC account, the major generator and major turbine overhaul expense included in this case, on a Total Company and Kentucky jurisdictional basis.
11. For each year 2017 through 2020, please provide in Excel format, by generating unit and FERC account, the projected major generator and major turbine overhaul expense, on a Total Company and Kentucky jurisdictional basis.
12. Please refer to Schedule D-1. Please provide a workpaper, in Excel format, that derives the total projected wage inflation included in the Base Period Jurisdictional and Forecasted Period Jurisdictional expense amounts by FERC account. Please identify the amount of each projected wage increase, the projected effective date of each wage increase, and show the application of each projected wage increase and resulting dollar impact.

Respectfully submitted,

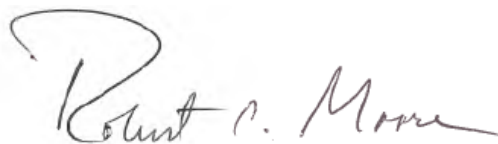


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COUNSEL FOR THE KROGER COMPANY

FILING NOTICE AND CERTIFICATE

I hereby certify that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission (which includes a cover letter serving as the required Read1st document) within two (2) business days; that the electronic filing was transmitted to the Commission on February 7, 2017; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



Robert C. Moore

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