COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

CASE NO. 2016-00371

THE KROGER COMPANY'S RESPONSE TO COMMISSION STAFF'S FIRST **REQUEST FOR INFORMATION**

The Kroger Company ("Kroger"), by and through counsel, submits the following Response to Commission Staff's First Request for Information:

1. Refer to the Direct Testimony of Neal Townsend. Provide Exhibit NT-2 electronically in Excel spreadsheet format, with all cells unprotected and all formulas accessible.

RESPONSE: Please see Kroger's response to the Companies Set 1, Question 1.

Respectfully submitted.

Robert C. Moore

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COUNSEL FOR THE KROGER COMPANY

VERIFICATION

STATE OF UTAH

SS:

COUNTY OF SALT LAKE)

The undersigned, **Neal Townsend**, being duly sworn, deposes and says that he is a Principal in the firm of Energy Strategies, LLC, that he has personal knowledge of the matters set forth in the foregoing testimony and exhibits, and that the answers contained therein are true and correct to the best of his information, knowledge and belief.

Neal Townsend

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 31st day of March, 2017.

Notary Public

My Commission Expires:

April 10,2019

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Notary Public Cimberile A. Ignjatovic Commission #682578 My Commission Expires April 10, 2019

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 March 31, 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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