

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

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 DATA REQUESTS OF KENTUCKY
UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO THE KROGER COMPANY**

The Kroger Company ("Kroger"), by and through counsel, submits the following Response to the Data Requests of Kentucky Utilities Company and Louisville Gas and Electric Company:

1. Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Townsend in connection with this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Townsend, please provide an electronic version of those documents with all formulas intact.

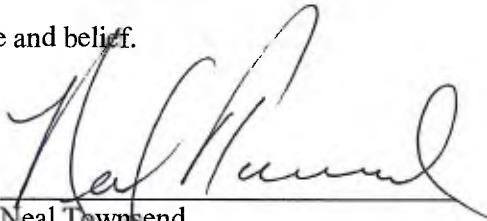
RESPONSE: Please see the attached Excel files.

1. Attachment A to Companies Set 1.1 (KU - Exhibit).
2. Attachment B to Companies Set 1.1 (KU - Overhaul WP).
3. Attachment C to Companies Set 1.1 (LG&E - Exhibits).
4. Attachment D to Companies Set 1.1 (LG&E - Overhaul WP).
5. Attachment E to Companies Set 1.1 (LG&E - Spread WP).

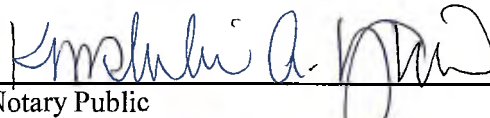
VERIFICATION

STATE OF UTAH)
COUNTY OF SALT LAKE) SS:

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

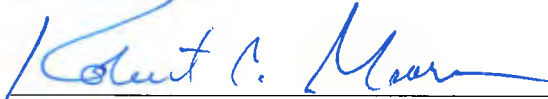
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 31st day of March, 2017.

 (SEAL)
Notary Public

My Commission Expires:
April 10, 2019



Respectfully submitted,

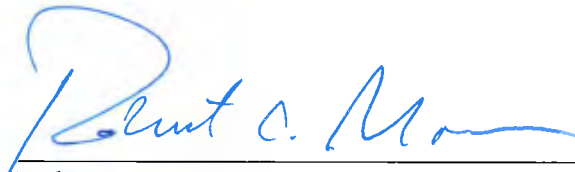


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COUNSEL FOR THE KROGER COMPANY

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 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