

**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 SUPPLEMENTAL DATA REQUESTS  
OF LOUISVILLE GAS AND ELECTRIC COMPANY**

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

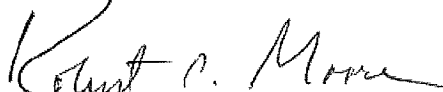
1. Provide a copy of all notes, data, and workpapers prepared by, or on behalf of, Mr. Townsend in connection with his rebuttal testimony filed in this proceeding. If any Excel spreadsheets or other computer generated documents were prepared by or on behalf of Mr. Townsend, please provide an electronic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

**SUPPLEMENTAL RESPONSE:** Mr. Townsend did not file rebuttal testimony.

However, Mr. Townsend assumes this data request intended to refer to his supplemental direct testimony. Given that assumption, please see the attached Excel files.

1. Attachment A to Companies Set 2.1 (LG&E - Exhibit).
2. Attachment B to Companies Set 2.1 (LG&E – Spread WP).
3. Attachment C to Companies Set 2.1 (Equalized LOLP COS).
4. Attachment D to Companies Set 2.1 (Equalized BIP COS).

Respectfully submitted,



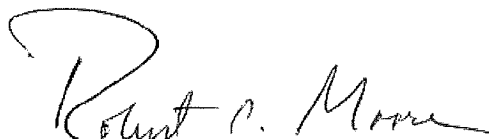
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COUNSEL FOR THE KROGER COMPANY

**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 April 28, 2017; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.



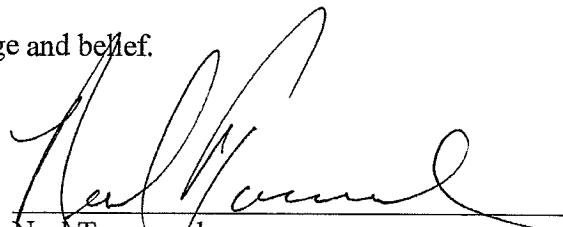
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Robert C. Moore

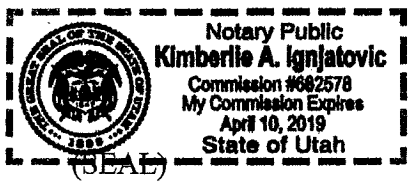
**VERIFICATION**

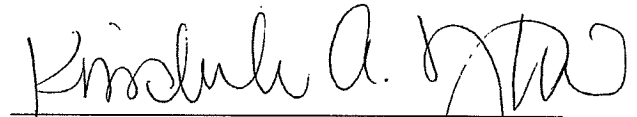
STATE OF UTAH            )  
                                  )  
COUNTY OF SALT LAKE )    SS:

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 response 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 28<sup>th</sup> day of April, 2017.



  
\_\_\_\_\_  
NOTARY PUBLIC