

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

<b>ELECTRONIC APPLICATION OF</b>	)	
<b>KENTUCKY POWER COMPANY FOR (1) A</b>	)	
<b>GENERAL ADJUSTMENT OF ITS RATES</b>	)	
<b>FOR ELECTRIC SERVICE; (2) AN ORDER</b>	)	
<b>APPROVING ITS 2017 ENVIRONMENTAL</b>	)	
<b>COMPLIANCE PLAN; (3) AN ORDER</b>	)	<b>CASE NO. 2017-00179</b>
<b>APPROVING ITS TARIFFS AND RIDERS;</b>	)	
<b>(4) AN ORDER APPROVING ACCOUNTING</b>	)	
<b>PRACTICES TO ESTABLISH REGULATORY</b>	)	
<b>ASSETS AND LIABILITIES; AND (5) AN</b>	)	
<b>ORDER GRANTING ALL OTHER REQUIRED</b>	)	
<b>APPROVALS AND RELIEF</b>	)	


**RESPONSES OF**  
**WAL-MART STORES EAST, LP, AND SAM'S EAST, INC.**  
**TO**  
**COMMISSION STAFF'S**  
**DATA REQUESTS**  
**DATED OCTOBER 26, 2017**

**FILED: NOVEMBER 3, 2017**


VERIFICATION

STATE OF ARKANSAS )  
 ) SS:  
COUNTY OF BENTON )

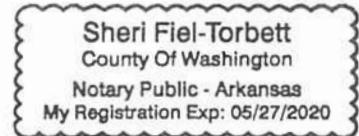
The undersigned, Gregory W. Tillman, being duly sworn, deposes and says that he is Senior Manager, Energy Regulatory Analysis for Wal-Mart Stores, Inc., and that he has personal knowledge of the matters set forth in the foregoing Responses, and that the answers contained herein is true and correct to the best of his information, knowledge, and belief.

  
\_\_\_\_\_  
Gregory W. Tillman

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 2<sup>nd</sup> day of November 2017.

  
\_\_\_\_\_  
Notary Public (SEAL)

My Commission Expires: 5.27.2020



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

**CASE NO. 2017-00179**

**Response to Commission Staff's  
Data Requests  
Dated October 26, 2017**

**Question No. 1**

**Responding Witness: Steve W. Chriss**

1. Refer to the Direct Testimony of Steve W. Chriss. Explain whether Option A of the proposed Renewable Power Rider allows Walmart to achieve Walmart's corporate renewable energy goals.

**RESPONSE:**

Option A would not allow Walmart to achieve its corporate renewable energy goals as the program will always be cost-additive and will not provide an opportunity for Walmart to realize the relative cost benefits of the consumption of renewable energy, should those benefits arise.

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

**CASE NO. 2017-00179**

**Response to Commission Staff's  
Data Requests  
Dated October 26, 2017**

**Question No. 2**

**Responding Witness: Gregory W. Tillman**

2. Refer to the Direct Testimony of Gregory W. Tillman, Exhibit GWT-3. Provide this exhibit in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible.

**RESPONSE:**

Please see Walmart's response to Question 1 of Kentucky Power Company's Data Requests to Walmart, providing the workpapers associated with Mr. Tillman's Direct Testimony, including the requested electronic version of Exhibit GWT-3.

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

**CASE NO. 2017-00179**

**Response to Commission Staff's  
Data Requests  
Dated October 26, 2017**

**Question No. 3**

**Responding Witness: Gregory W. Tillman**

3. Explain whether any of Walmart's facilities within the Kentucky Power Company service territory participate directly or indirectly through a third party in any energy-efficiency program or market administered by PJM Interconnection, L.L.C. If so, explain the nature of the program or market, the aggregate size of the load that is participating, and the name of each third-party aggregator.

**RESPONSE:**

Based on a review of internal Walmart energy department records, all energy efficiency projects completed at facilities within the Kentucky Power Company service territory have been completed pursuant to the Company's DSM program. Accordingly, to the best of Mr. Tillman's information and belief, none of Walmart's facilities within Kentucky Power Company's service territory participate directly or indirectly, through a third-party aggregator, in any energy-efficiency program or market administered by PJM Interconnection, L.L.C.

**CERTIFICATE OF SERVICE**

I hereby certify that Walmart's November 3, 2017, electronic filing is a true and accurate copy of the Wal-Mart Stores East, LP and Sam's East, Inc.'s Responses (with Verifications) to the Commission Staff's Data Requests to be filed in paper medium; and that on November 3, 2017, the electronic filing has been transmitted to the Commission, and that an original and one copy of these documents 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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Certificate of Service  
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