

**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>	)	

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

**TO**

**COMMISSION STAFF'S**  
**SECOND DATA REQUESTS**

**DATED NOVEMBER 14, 2017**

**FILED: NOVEMBER 20, 2017**

VERIFICATION

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
COUNTY OF CUMBERLAND )

The undersigned, Barry A. Naum, being duly sworn, deposes and says that he is Counsel for Wal-Mart Stores East, LP and Sam's East, Inc., and that he has personal knowledge of the matters set forth in the foregoing Objection and Response, and that the objection and response contained herein are true and correct to the best of his information, knowledge and belief.

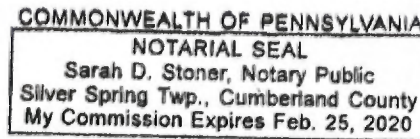


Barry A. Naum

Subscribed and sworn to before me, a Notary Public in and before said County and Commonwealth, this 20<sup>th</sup> day of November, 2017.

Sarah D. Stoner (SEAL)  
Notary Public

My Commission Expires: February 25, 2020



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

**CASE NO. 2017-00179**

**Objection and Response to Commission Staff's  
Second Data Requests  
Dated November 14, 2017**

**Question No. 1**

**Response provided by Counsel**

1. Refer to the Walmart's response to Commission Staffs First Request for Information, Item 3. The intent of the question was not for Walmart to explain whether it is participating in any third-party program or market with respect to energy-efficiency projects installed or completed at Walmart facilities. Rather, the intent of the question was for Walmart to explain whether it is participating within Kentucky Power Company's service territory in any third-party energy-efficiency program or market administrated by PJM Interconnect, L.L.C. whereby Walmart sells at retail energy-efficiency products including, but not limited to, LED light bulbs in return for which Walmart receives payment from a third party. With this clarification, either confirm that Walmart's prior response is still accurate or provide a further explanation.

**OBJECTION AND RESPONSE:**

Walmart objects to this request on the grounds that the request seeks information that is not relevant to any subject matter of this proceeding and was served on Walmart outside of the discovery period established by the Commission in its July 17, 2017, Order entered in this case.

Subject to and without waiving the foregoing objections, Walmart's witnesses in this proceeding are unaware of "any third-party energy-efficiency program or market administrated by PJM Interconnect, L.L.C. whereby Walmart sells at retail energy-efficiency products ... for which Walmart receives payment from a third party."

## CERTIFICATE OF SERVICE

I hereby certify that Walmart's November 20, 2017, electronic filing is a true and accurate copy of the Wal-Mart Stores East, LP and Sam's East, Inc.'s Objection and Response (with Verification) to the Commission Staff's Second Data Requests to be filed in paper medium; and that on November 20, 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  
Case No. 2017-00179  
Page 2

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