

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

IN THE MATTER OF APPLICATION OF KENTUCKY POWER :
COMPANY (1) A GENERAL ADJUSTMENT OF ITS RATES FOR :
ELECTRIC SERVICE; (2) AN ORDER APPROVING ITS 2017 : **Case No 2017-00179**
ENVIRONMENTAL COMPLIANCE PLAN; (3) AN ORDER :
APPROVING ITS TARIFFS AND RIDERS; (4) AN ORDER :
APPROVING ACCOUNTING PRACTICES TO ESTABLISH :
REGULATORY ASSETS AND LIABILITIES; AND (5) AN ORDER :
GRANTING ALL OTHER REQUIRED APPROVALS AND RELIEF :

**FIRST SET OF DATA REQUESTS OF
KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.
TO WAL-MART STORES EAST, LP AND SAM'S EAST, INC.**

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**COUNSEL FOR KENTUCKY INDUSTRIAL
UTILITY CUSTOMERS, INC.**

Dated: August 14, 2017

DEFINITIONS

1. “Document” means the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, notations of any sort concerning conversations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence investigations, questionnaires, surveys, worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium, including computerized memory or magnetic media.
2. “Study” means any written, recorded, transcribed, taped, filmed, or graphic matter, however produced or reproduced, either formally or informally, a particular issue or situation, in whatever detail, whether or not the consideration of the issue or situation is in a preliminary stage, and whether or not the consideration was discontinued prior to completion.
3. “Person” means any natural person, corporation, professional corporation, partnership, association, joint venture, proprietorship, firm, or the other business enterprise or legal entity.
4. A request to identify a natural person means to state his or her full name and residence address, his or her present last known position and business affiliation at the time in question.
5. A request to identify a document means to state the date or dates, author or originator, subject matter, all addressees and recipients, type of document (e.g., letter, memorandum, telegram, chart, etc.), number of code number thereof or other means of identifying it, and its present location and custodian. If any such document was, but is no longer in the Company’s possession or subject to its control, state what disposition was made of it.
6. A request to identify a person other than a natural person means to state its full name, the address of its principal office, and the type of entity.
7. “And” and “or” should be considered to be both conjunctive and disjunctive, unless specifically stated otherwise.
8. “Each” and “any” should be considered to be both singular and plural, unless specifically stated otherwise.
9. Words in the past tense should be considered to include the present, and words in the present tense include the past, unless specifically stated otherwise.
10. “You” or “your” means the person whose filed testimony is the subject of these interrogatories and, to the extent relevant and necessary to provide full and complete answers to any request, “you” or “your” may be deemed to include any person with information relevant to any interrogatory who is or was employed by or otherwise associated with the witness or who assisted, in any way, in the preparation of the witness’ testimony.
12. “Company” or “Wal-Mart” means Wal-Mart Stores East, LP and Sam’s East, Inc. and/or any of their officers, directors, employees or agents who may have knowledge of the particular matter addressed.

INSTRUCTIONS

1. If any matter is evidenced by, referenced to, reflected by, represented by, or recorded in any document, please identify and produce for discovery and inspection each such document.
2. These interrogatories are continuing in nature, and information which the responding party later becomes aware of, or has access to, and which is responsive to any request is to be made available to Kentucky Industrial Utility Customers. Any studies, documents, or other subject matter not yet completed that will be relied upon during the course of this case should be so identified and provided as soon as they are completed. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as it first becomes available to the Respondent after the answers hereto are served.
3. Unless otherwise expressly provided, each interrogatory should be construed independently and not with reference to any other interrogatory herein for purpose of limitation.
4. The answers provided should first restate the question asked and also identify the person(s) supplying the information.
5. Please answer each designated part of each information request separately. If you do not have complete information with respect to any interrogatory, so state and give as much information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.
6. In the case of multiple witnesses, each interrogatory should be considered to apply to each witness who will testify to the information requested. Where copies of testimony, transcripts or depositions are requested, each witness should respond individually to the information request.
7. The interrogatories are to be answered under oath by the witness(es) responsible for the answer.
8. Responses to requests for revenue, expense and rate base data should provide data on the basis of Total Company as well as Intrastate data, unless otherwise requested.

**KIUC's FIRST SET OF DATA REQUESTS
TO WAL-MART STORES EAST, LP AND SAM'S EAST, INC.
PSC CASE NO. 2012-00578**

Please refer to the July 21, 2017 testimony of Mr. Tillman at page 3.

- Q.1-1 Of the “*nearly 30,000 associates*” employed by Wal-Mart in Kentucky, please provide the following.
- a. How many employees were full time (40 hours or more per week).
 - b. How many employees were part time (less than 40 hours per week).
- Q.1-2 Of the \$1.3 billion Wal-Mart spent with 848 Kentucky based suppliers please provide the following.
- a. Please list the names of each of the 848 suppliers.
 - b. Please provide the product supplied by each of the 848 suppliers.
 - c. Please identify how much money was spent by Wal-Mart with each of the 848 suppliers.
- Q.1-3 Please provide the analysis which supports the assertion that Wal-Mart supported “*an additional 35,000 jobs*” in Kentucky.

Respectfully submitted,



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