

VERIFICATION

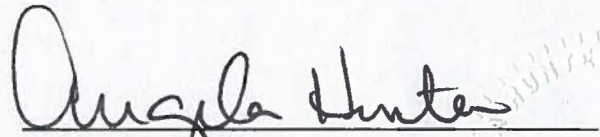
STATE OF NORTH CAROLINA)
)
COUNTY OF MECKLENBURG) **SS:**

The undersigned, Robert H. "Beau" Pratt., Director, Regional Financial Forecasting, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained are true and correct to the best of his knowledge, information and belief.



Robert H. "Beau" Pratt Affiant

Subscribed and sworn to before me by Robert H. "Beau" Pratt on this 3 day of November, 2017.



NOTARY PUBLIC

My Commission Expires:

**My Commission Expires
05-30-2018**



VERIFICATION

STATE OF OHIO)
)
COUNTY OF HAMILTON) SS:

The undersigned, Sarah E. Lawler, Utility Strategy Director, being duly sworn, deposes and says that she has personal knowledge of the matters set forth in the foregoing data requests, and that the answers contained therein are true and correct to the best of her knowledge, information and belief.

S. E. Lawler

Sarah E. Lawler Affiant

Subscribed and sworn to before me by Sarah E. Lawler on this 6th day of NOVEMBER, 2017.

Anita M. Schaffer

NOTARY PUBLIC

My Commission Expires:



ANITA M. SCHAFER
Notary Public, State of Ohio
My Commission Expires
November 4, 2019

KyPSC Case No. 2017-00321
KROGER'S FIRST SET
TABLE OF CONTENTS

<u>DATA REQUEST</u>	<u>WITNESS</u>	<u>TAB NO.</u>
KROGER-DR-01-001	Sarah E. Lawler	1
KROGER-DR-01-002	Sarah E. Lawler	2
KROGER-DR-01-003	Sarah E. Lawler	3
KROGER-DR-01-004	Robert H. Pratt	4

KROGER-DR-01-001

REQUEST:

Please provide an electronic version of the Company's filing and workpapers in this case. This should include the documents listed in parts (a) through (e) below. In supplying these materials please remove any passwords or other restrictions that may otherwise be required to open or modify the files:

- a. The Company's Application, Testimony, Exhibits and Schedules in their native electronic formats, i.e., Word, Excel, etc. with working formulas and references included where applicable.
- b. All workpapers utilized in the preparation of the Company's filing in this case, preferably in Excel format with all working formulas and links included to the extent practicable.
- c. A working copy of the Company's Base Year and Forecast Test Year Revenue Requirement model(s) and supporting workpapers in Excel format with working formulas included. If there is any supporting documentation on the use/operation of these models, please include the documentation with this response.
- d. A working copy of the Company's Class Cost of Service model and all supporting workpapers in Excel format with working formulas included.

- e. A working copy of the Company's Rate Design model and all supporting workpapers in Excel format with working formulas included.

RESPONSE:

- a. Objection. This request is overbroad, and unduly burdensome. The Company's application and testimony is available on the Commission website in the docket in a searchable PDF format and can be easily obtained by any Party. Without waiving said objection, and to the extent discoverable. See response to Staff-DR-01-071.
- b. Objection. This request is overbroad, unduly burdensome and vague as to "all workpapers." Additionally, this request is further objectionable to the extent it would request production of information that is considered protected under the doctrine of attorney work product or privileged. Without waiving said objection and to the extent discoverable, please see responses to Staff-DR-01-071
- c. See Staff-DR-01-071.
- d. See Staff-DR-0-071.
- e. See response to NKU-DR-01-001.

PERSON RESPONSIBLE: Sarah E. Lawler

**Duke Energy Kentucky
Case No. 2017-00321
Kroger's First Set Data Requests
Date Received: October 27, 2017**

KROGER-DR-01-002

REQUEST:

To the extent the Company files corrections, revisions, amendments, supplemental information and/or errata to its originally filed case, please provide all updated materials including the Company's testimony, exhibits, schedules, workpapers and models, preferably in Excel format, with working formulas included where applicable.

RESPONSE:

To the extent the Company is required to file any corrections, revisions, amendments, supplemental information to its originally filed case, it will provide any applicable exhibits, schedules, workpapers and models, in Excel format, with working formulas included where applicable.

PERSON RESPONSIBLE: Sarah E. Lawler

**Duke Energy Kentucky
Case No. 2017-00321
Kroger's First Set Data Requests
Date Received: October 27, 2017**

KROGER-DR-01-003

REQUEST:

Please provide copies of all past and future data responses provided by the Company in response to all data requests submitted by other parties in this case.

RESPONSE:

Objection. Overbroad, unreasonable and unduly burdensome. The information requested is already available to Kroger. Without waiving said objection, and to the extent discoverable, the Company's non-confidential responses to prior data requests are available on the Commission's website and are equally accessible to Kroger. Confidential information provided under seal will be provided pursuant to the executed confidentiality agreement between the parties. The Company agrees to provide responses to all data requests in this proceeding going forward.

PERSON RESPONSIBLE:

Legal- As to Objection
Sarah E. Lawler – As to response

REQUEST:

Regarding non-fuel, non-labor O&M expense inflation/escalation:

- a. Please indicate whether any inflation, price escalation, or unit cost escalation has been included in the calculation of non-labor, non-fuel O&M expenses for the estimated portion of the base period or the Forecasted Test Period.
- b. If inflation or cost escalation has been included in the calculation of non-labor, non-fuel O&M expenses, please provide DEK's best estimate of the dollar amount of inflation included in the Forecasted Test Period applicable to non-labor, non-fuel O&M expenses.
- c. If inflation or cost escalation has been included in the calculation of non-labor, non-fuel O&M expenses, please explain how the inflation or cost escalation factors were derived, and provide the inflation or cost escalation factors applicable to each affected FERC account for both the estimated portion of the Base Period and the Forecasted Test Period, if applicable.
- d. If inflation or cost escalation has been included in the calculation of non-labor, non-fuel O&M expenses, please provide detailed workpapers in Excel format with intact formulas which apply the inflation or cost escalation factors to the actual historical data. For each affected FERC account, please provide the actual historical non-labor, non-fuel O&M expense amount to which the

inflation/escalation is applied, the amount of the inflation/escalation, and the projected O&M expense amount after inflation/escalation.

If not otherwise provided in the Company's response to part (d), please provide workpapers in Excel format which link the inflation/escalation amounts to the Filing Requirements schedules and/or revenue requirement model, or otherwise demonstrate how these inflation/escalation amounts are integrated into the Base Period and Forecasted Test Period revenue requirements.

RESPONSE:

- a. There is no specific inflation/price escalation, or unit cost escalation in the calculation of the non-labor, non-fuel O&M expenses for the estimated portion of the base period or the forecast period. Instead, the Company has and is seeking cost savings to offset labor inflation to achieve overall flat O&M.
- b. n/a
- c. n/a
- d. n/a

PERSON RESPONSIBLE: Robert H Pratt