COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

ELECTRONIC JOINT APPLICATION OF
LOUISVILLE GAS AND ELECTRIC
COMPANY AND KENTUCKY UTILITIES
COMPANY FOR REVIEW, MODIFICATION,
AND CONTINUATION OF CERTAIN
EXISTING DEMAND-SIDE MANAGEMENT
AND ENERGY EFFICIENCY PROGRAMS

CASE NO. 2017-00441

DIRECT TESTIMONY AND EXHIBIT OF
KENNETH E. BAKER
ON BEHALF OF
WAL-MART STORES EAST, LP AND SAM'S EAST, INC.

Dated: March 21, 2018
Introduction

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION
FOR THE RECORD.

A. My name is Kenneth E. Baker. I am employed by Walmart, Inc.\(^1\) as the Senior Manager of Sustainable Regulation. My business address is 2001 SE 10\(^{th}\) Street, Bentonville, AR 72716.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS DOCKET?

A. I am testifying on behalf of Wal-Mart Stores East, LP and Sam's East, Inc. (collectively, "Walmart").

Q. PLEASE DESCRIBE YOUR EDUCATION AND PROFESSIONAL EXPERIENCE.

A. I received my Bachelor of Science in Health Science from the College of St. Frances in 1985. In 1992, I obtained a Juris Doctorate from the University of Arkansas at Little Rock School of Law. From 1992 to 1999, I practiced law at the Center for Arkansas Legal Services. I joined Walmart in November 1999 as the Manager of Real Estate, and was responsible for locating sites around the United States to build distribution centers and negotiating agreements with local communities related to the building of such centers. In 2006, I transferred to the Energy Department. In my current role, I am responsible for monitoring and participating in cases before state and federal utility commissions and for monitoring energy legislation relevant to Walmart's business operations. I have also been involved in the negotiation, drafting, and execution of renewable energy and energy efficiency contracts.

\(^1\) Effective February 1, 2018, Wal-Mart Stores, Inc. changed its corporate legal name to Walmart Inc.
Q. PLEASE STATE YOUR QUALIFICATIONS.
A. My qualifications are attached hereto as Exhibit KEB-1.

Q. HAVE YOU PREVIOUSLY TESTIFIED OR SUBMITTED TESTIMONY BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION ("COMMISSION")?
A. Yes, I submitted both Direct and Supplemental Testimony on behalf of Walmart in the Companies' prior DSM proceeding at Case No. 2014-00003.

Q. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE OTHER STATE REGULATORY COMMISSIONS?
A. Yes. See Exhibit KEB-1.

Q. ARE YOU SPONSORING EXHIBITS IN YOUR DIRECT TESTIMONY?
A. Yes. I am sponsoring Exhibit KEB-1.

Q. BRIEFLY DESCRIBE WALMART'S OPERATIONS IN KENTUCKY UTILITIES COMPANY'S ("KU") AND LOUISVILLE GAS & ELECTRIC COMPANY'S ("LG&E") (COLLECTIVELY, "COMPANIES") SERVICE TERRITORIES.
A. Walmart operates 36 facilities within KU's territory and 22 facilities within LG&E's territory.

Q. HOW DOES WALMART'S LOAD COMPARE TO OTHER CUSTOMERS IN THE COMPANIES' SERVICE TERRITORIES?
A. On an aggregated basis, Walmart's load is likely one of the largest loads served by the Companies, making it one of the Companies' largest customers.
Q. UNDER WHAT RATE SCHEDULES DOES WALMART TAKE SERVICE FROM THE COMPANIES?

A. Walmart primarily takes service under Rates General Service ("GS"), Time-of-Day Secondary Service ("TODS"), and Time-of-Day Primary Service ("TODP").

Purpose of Testimony and Recommendations

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to address the industrial opt-out as proposed by the Companies in their Application for Review, Modification, and Continuation of Certain Existing Demand-Side Management ("DSM") and Energy Efficiency ("EE") Programs ("Application").

Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS TO THE COMMISSION.

A. Walmart recommends the following to the Commission:

1) The Commission should reject the industrial opt-out as proposed by the Companies because it arbitrarily excludes energy intensive customers taking service under industrial rates, and fails to articulate how the rate classes selected by the Companies for inclusion in the proposed industrial opt-out satisfies the "energy intensive" requirement set forth in KRS 278.285(3).

2) When determining who does and does not qualify for the opt-out set forth in KRS 278.285(3), the Commission should thoroughly evaluate and give considerable deference to all customers that are receiving service under the Companies' industrial rate schedules, especially those that historically and continually strive to be proactive leaders in the implementation of DSM/EE measures.
3) In the event the Commission rejects Walmart's recommendations concerning the
definition and parameters of the industrial opt-out, the Commission should implement
an alternative program, such as a self-direct option, in order to provide equitable
treatment to all large energy users.

Q. DOES THE FACT THAT YOU MAY NOT ADDRESS AN ISSUE OR POSITION
ADVOCATED BY THE COMPANIES INDICATE WALMART'S SUPPORT?

A. No. The fact that an issue is not addressed herein or in related filings should not be
construed as an endorsement of any filed position.

Walmart's use of and participation in DSM and EE Programs.

Q. DOES WALMART INDEPENDENTLY INVEST IN DSM AND EE MEASURES?

A. Yes.

Q. CAN YOU GIVE SPECIFIC EXAMPLES OF WALMART'S DEPLOYMENT OF
DSM AND EE TECHNOLOGIES?

A. Walmart has been an industry leader in the implementation of DSM/EE, implementing a
multitude of energy efficient technologies, including:

1) Sub-metering systems in approximately 1,650 facilities in the United States;

2) Daylight harvesting systems that monitor and adjust lighting intensity while
   automatically adjusting the given amount of light coming in from the skylights;

3) White membrane roofs are used in certain parts of the country in order to lower the
   cooling load;

4) Heat reclamation from our refrigerator systems;

5) Highly efficient heating, ventilation, and air conditioning ("HVAC") systems;
6) Indoor and outdoor light-emitting diode ("LED") lighting;
7) Active dehumidification that enables stores to operate at higher temperatures and use less electricity;
8) Variable speed drive fans on refrigeration condenser coils; and,
9) Anti-sweat heater controls.

Additionally, Walmart's United States stores, including those in the Commonwealth of Kentucky, use a centrally monitored energy management system. When this system is combined with select advanced metering, Walmart can more efficiently implement energy efficiency and demand response initiatives.

Q. DOES WALMART PARTICIPATE IN DEMAND RESPONSE WITHIN THE COMMONWEALTH OF KENTUCKY?
A. Yes. Walmart participates in demand response at 25 locations within KU's territory and 10 locations within the LG&E territory.

Industrial Opt-Out

Q. WHAT IS THE INDUSTRIAL OPT-OUT?
A. It is my understanding that the industrial opt-out is statutory in nature and permits industrial customers to opt out from participating in an incumbent electric utility's sponsored DSM/EE programs. See KRS 278.285(3). The industrial opt-out is set forth in KRS 278.285(3) and states as follows:

The commission shall assign the cost of demand-side management programs only to the class or classes of customers which benefit from the programs. The commission shall allow individual industrial customers with energy intensive processes to implement cost-effective energy efficiency measures in lieu of measures approved as part of the utility's
demand-side management programs if the alternative measures by these customers are not subsidized by other customer classes. Such individual industrial customers shall not be assigned the cost of demand-side management programs.

Q. DOES KRS 278.285(3) DEFINE WHO IS ELIGIBLE TO OPT OUT?

A. The statute directs the Commission to allow individual industrial customers with energy intensive processes to implement cost-effective energy efficiency measures instead of participating in utility-sponsored DSM programs. The meaning of "industrial," "energy intensive processes," and "cost-effective energy efficiency measures" were not defined by the Legislature.

Q. HAS THE COMMISSION INTERPRETED KRS 278.285(3), OR DEFINED THE MEANING OF THESE TERMS IN THAT STATUTE?

A. No; however, in the Commission's Final Order approving a settlement in Case Nos. 2014-00371 and 2014-00372, the Companies committed to address the opt-out criteria set forth in KRS 278.285(3) "in their first DSM/EE application following completion" of a study on possible utility-sponsored DSM/EE programs for industrial customers.2 Under the terms of the settlement approved in that case, this requirement included addressing the definition of the term "industrial."3 This Application by the Companies is the first such DSM/EE filing.

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3 Id. at Appendix A, p. 9.
Q. DO YOU BELIEVE THE LEGISLATURE LEFT CONSIDERABLE DISCRETION TO THE COMMISSION TO DEFINE THE SCOPE OF AND QUALIFICATIONS FOR PARTICIPATION IN THE INDUSTRIAL OPT OUT?
A. Yes.

Q. PLEASE EXPLAIN.
A. By failing to define certain terms such as the meaning of "industrial" or "energy intensive processes," it seems apparent that the Kentucky Legislature left the Commission with considerable latitude to determine who can and should participate in the opt-out. If the Legislature wanted to define who could participate in the opt-out, it could have done so. The Commission's discretion is exercised through defining the controlling provisions that make up the heart of opt-out eligibility, i.e., the meaning of "industrial" and "energy intensive processes".

Q. ARE YOU FAMILIAR WITH THE DEFINITIONS OF "INDUSTRIAL" AND "ENERGY INTENSIVE" PROPOSED BY THE COMPANIES?
A. Yes. The Companies' witness, Rick E. Lovekamp, offers testimony on the scope of the industrial opt-out proposed by the Companies and offers redline revisions to the Companies' current tariffs as follows:

1) Eliminates the use of the North American Industry Classification System ("NAICS") codes to define "industrial." 

2) Defines "industrial customers" as:

   non-residential customers engaged in activities primarily using energy (electricity or gas) in a process or processes involving either the extraction of raw materials from the

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4 See, e.g., KRS 278.010 (providing definitions applicable to public utilities).
5 See Direct Testimony of Companies' Witness Rick E. Lovekamp ("Lovekamp Direct"), p. 6, lines 2-4.
earth or a change of raw or unfinished materials into another form or product.⁶

3) Limits the industrial opt-out to those customers who take service under rate schedules Fluctuating Load Service ("Rate FLS"), Retail Transmission Service ("Rate RTS"), and Rate TODP, claiming those rate schedules are "energy intensive."⁷

Q. DOES WALMART HAVE ANY CONCERNS WITH THE COMPANIES' RECOMMENDATIONS?

A. Yes. While Walmart supports the Companies' proposal to eliminate the use of the NAICS codes, it appears that the definition for "industrial" proposed by the Companies is tantamount to continued use of the NAICS codes.

Q. PLEASE EXPLAIN.

A. The description underlying the NAICS code numbers previously relied on by the Companies are compatible with the definitions proposed in Mr. Lovekamp's Direct Testimony. Under their prior definition, the Companies linked the opt-out to NAICS numbers 21, 22, and 31-33. By way of example, the definition for NAICS code numbers 31-33 are "establishments engaged in the mechanical, physical, or chemical transformation of materials, substances, or components into new products."⁸ The NAICS code number description is synonymous with the definition for "industrial" proposed by the Companies in this proceeding. There is little difference between referencing a specific NAICS code number and writing out the substance of the code number's

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⁶ Id. at lines 4-7.
⁷ Id. at lines 8-13.
description. The impact remains the same: the Companies effectively still rely on the NAICS codes to determine what constitutes "industrial" for purposes of the opt-out.

Q. HAS THE COMMISSION PREVIOUSLY EXPRESSED CONCERN OVER USE OF THE NAICS CODES?
A. Yes. In Case No. 2014-0003, the Commission noted that there were legitimate concerns regarding the Companies' use of NAICS codes to determine the parameters of the industrial opt-out authorized by KRS 278.285(3).9

Q. DO YOU HAVE CONCERNS WITH THE COMPANIES' PROPOSAL TO LIMIT THE OPT-OUT TO CERTAIN RATE SCHEDULES BASED ON THE COMPANIES' CLAIM THAT THESE RATE SCHEDULES ARE "ENERGY INTENSIVE"?
A. Yes.

Q. PLEASE EXPLAIN.
A. The Companies do not attempt to define the meaning of the phrase "energy intensive" and they offer no explanation or justification for limiting the opt-out to only Rate Schedules RTS, TODP and FLS. Although they claim these are "energy intensive" rate schedules, and appear to presume that customers on these rate schedules employ "energy intensive processes," they fail to offer any explanation to support this position. Moreover, they do not explain how customers who take service under other traditionally "industrial" rate schedules such as TODS would not also be involved in "energy

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Q. WHAT IS THE POTENTIAL IMPACT OF THE COMPANIES' PROPOSED DEFINITIONS?

A. The end result of the Companies' unnecessarily limited definition of "industrial" would mean that similarly situated customers on the same or similar rate schedules would be treated discriminatorily for purposes of the opt-out simply by not meeting the narrowly expressed confines of "industrial" as that term has been defined by the Companies. For example, an energy intensive customer that takes service under Rate TODP may be prohibited from opting out simply because it does not "extract raw materials from the earth or [effects] a change of raw or unfinished materials into another form or product," regardless of the fact that it takes service under the same rate schedule as a qualified "industrial" customer (as defined by the Companies) and its level of energy usage may be the same as, if not greater than, that of the qualified "industrial" customer.

In the same way, under the Companies' proposed delineation of "energy intensive" that encompasses just three rate schedules would treat similarly situated customers on different rates in a discriminatory manner, regardless of whether they meet the proposed definition of "industrial." For example, a customer that "extracts raw materials from the earth or [effects] a change of raw or unfinished materials into another form or product using energy intensive processes" may be prevented from opting out simply because it takes service under Rate TODS, while a competitor, doing the same business, would be able to opt-out simply because it takes service under Rate TODP or another of the
Companies' qualified rate schedules. Such results are inherently discriminatory and unjustified.

In short, the Companies' proposal arbitrarily picks winners and losers for the purpose of the opt-out in virtually the same negative way that historical usage of the NAICS Code has led to negative and discriminatory results.

Q. DOES WALMART PROPOSE AN ALTERNATIVE FRAMEWORK FOR DEFINING "INDUSTRIAL" AS SET FORTH IN KRS 278.285(3)?

A. Yes. Walmart agrees with the Companies that rate schedules certainly can be used to determine whether a customer takes service under an "industrial" rate schedule. In fact, Walmart believes that a traditional regulatory understanding of "industrial" versus "commercial" rates can be employed to identify which customers are eligible for the opt-out. To that end, rather than limiting the opt-out to only certain industrial rate schedules, Walmart believes that all of the Companies' largest "industrial" rate schedules (i.e., Rates RTS, FLS, TODP, and TODS) should qualify for the opt-out set forth in KRS 278.285(3). This broad definition would capture all of the Companies' industrial energy users, as well as all of their largest users in general.

Q. DOES WALMART PROPOSE AN ALTERNATIVE FRAMEWORK FOR THE DEFINITION OF "ENERGY INTENSIVE" AS SET FORTH IN KRS 278.285(3)?

A. Yes. Merriam-Webster defines "intensity" as "the magnitude of a quantity (such as force or energy) per unit (as of area, charge, mass, or time)." Walmart proposes that the definition of "energy intensive" should incorporate a combination of an average monthly load factor and a minimum customer size.

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10 See https://www.merriam-webster.com/dictionary/intensity
Load factor is an easily measurable indicator of energy intensity – as load factor increases, the amount of energy usage in kWh relative to the maximum demand in kW of the energy-using equipment installed at the facility increases. A customer with a load factor of 60 percent is a more energy intensive customer than one with a load factor of 10 percent. For the purposes of this docket, Walmart recommends a minimum average monthly load factor of 60 percent.

In terms of customer size, Walmart recommends that the Commission align the minimum customer size with the requirements for the Time-of-Day Schedules, which are 250 kW for secondary service and 250 kVa for primary service.  

Q. TO DATE, CUSTOMER SIZE AND LOAD FACTOR REQUIREMENTS HAVE NOT BEEN USED TO DETERMINE OPT-OUT ELIGIBILITY. WHAT IS WALMART'S RECOMMENDATION FOR THOSE CUSTOMERS?

A. Walmart recommends that the Commission grandfather all existing opt-out customers. Walmart would also not oppose a proposal that very large customers (e.g., above 5 MW) be able to opt-out regardless of load factor.

The benefits to voluntary DSM/EE measures undertaken by large customers.

Q. DO THE COMPANIES ACKNOWLEDGE THE EXTENSIVE ENERGY EFFICIENCY MEASURES INSTALLED BY SOME CUSTOMERS.

A. Yes. Companies' witness David E. Huff stated in his Direct Testimony:

In addition, large customers, both commercial and industrial, have invested in energy efficiency beyond utility-run DSM-EE programs. For example, Walmart has testified before this
Q. GIVEN THE OPPORTUNITY TO PARTICIPATE IN THE COMPANIES’ NON-RESIDENTIAL DSM PROGRAMS, WHY WOULD WALMART DESIRE TO OPT-OUT OF THE COMPANIES DSM/EE PROGRAMS?

A. As previously stated, Walmart is a national retailer who has undertaken DSM/EE measures on an expansive scale. With its extensive experience in DSM/EE, Walmart is in the best position to create programs tailored to maximize the impact of the DSM and EE measures installed at its facilities, not only in the Companies' service territory, but throughout the Commonwealth of Kentucky and its global operations. Additionally, due to the size and scope of the DSM/EE measures Walmart can implement on a company-wide scale, it can potentially benefit in the competitive marketplace for energy efficient goods and services, as energy service companies compete to provide the most innovative and cost-effective products to those customers on a regional and national basis. Fostering innovation will also benefit the Commonwealth of Kentucky as it will improve DSM/EE products available in Kentucky. Further, if allowed to opt out, Walmart, or any other opt-out customer, would assume all risk of its investment in DSM/EE measures, which eliminates having that risk passed on to other ratepayers in the Companies' service territories.

Q. CAN WALMART'S DSM/EE MEASURES BENEFIT OTHER RATEPAYERS WHO DO NOT OPT OUT?

A. Yes. Proactive customers, such as Walmart, who aggressively pursue their own EE measures yield numerous benefits to other utility customers. Some of those benefits

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12 See Direct Testimony of Companies' Witness, David E. Huff ("Huff Direct"), p. 11, lines 3-6.
include reduced overall energy costs that result from the reduced demand of the
customer's facilities. Additionally, increased system reliability is realized due to
reduction in electric usage due to increased EE installations. These and numerous other
benefits flow to all customers at no cost to those customers when a large customer is
allowed to opt out of the incumbent electric utility's DSM/EE programs.

Q. **DO YOU HAVE A RECOMMENDATION FOR THE COMMISSION CONCERNING THE OPT-OUT?**

A. Yes. I recommend that the Commission take a holistic view of the energy usage of
customers taking service from traditional "industrial" rate schedules and determine that
Walmart, and perhaps other businesses with multiple locations and very large loads in the
Companies' territories on these rate schedules, qualify for the opt-out codified in
KRS 278.285(3). In light of the size of Walmart's aggregated load, exclusion of Walmart
(and other similarly situated customers) from the opt-out proposed by the Companies in
their Application results in somewhat illogical and certainly inequitable and
discriminatory distinctions. In light of the significant discretion granted to the
Commission by the Kentucky Legislature, the Commission should implement a definition
of both "industrial" and "energy intensive" that creates an environment that will allow
energy efficiency to flourish.
Q. TO THE EXTENT WALMART QUALIFIED FOR AN OPT-OUT FROM THE COMPANIES' DSM/EE PROGRAMS, WOULD WALMART AUTOMATICALLY OPT OUT?

A. No. Our responsibility to our shareholders dictates that we weigh the amount of DSM charges paid annually against the rebates or other program benefits received from the utility.

Q. IN THE EVENT THAT THE COMMISSION REJECTS WALMART'S RECOMMENDATIONS, DO YOU HAVE ANY ALTERNATIVE PROPOSALS FOR THE OPT-OUT?

A. Yes. While I believe that my recommendations are reasonable and workable, as indicated above, my primary concern is that the Companies' proposed opt-out will result in discriminatory treatment of similarly-situated customers. As such, if the Commission rejects my recommendations and adopts the Companies' proposed definition of "industrial" for purposes of the opt-out, I respectfully recommend that the Commission can, and should, still exercise its discretion to require the Companies to extend opt-out eligibility to all customers on all "energy intensive" rates, including Rate TODS, regardless of whether they meet the "raw material" process and other requirements of the proposed "industrial" definition. This would mean that all qualified "industrial" customers, as well as all similarly-situated customers taking service on those rates, would be treated equally as a rate class. This would be a just and reasonable solution for the Commission to adopt, and nothing in KRS 278.285(3) prohibits the Commission from doing so.
Implementation of a Self-Direct Option

Q. DOES WALMART PROPOSE ANOTHER ALTERNATIVE COURSE FOR NON-RESIDENTIAL CUSTOMERS IF THE COMMISSION DETERMINES TO KEEP THE OPT-OUT AS PROPOSED BY THE COMPANIES?

A. The Commission should give serious and thorough consideration to allowing an aggregated large energy user a "self-direct program." A self-direct program would provide reasonable treatment to aggregated large energy users.

Q. WHAT RECOMMENDATIONS DO YOU HAVE FOR THE COMMISSION IF THEY IMPLEMENT A SELF-DIRECT PROGRAM?

A. The Commission should allow any non-residential customer who has electric usage above a benchmark level for all of its sites aggregated under one of the Companies to elect to not participate in KU's or LG&E's DSM program if it commits to achieve its own DSM/EE savings. For example, a non-residential customer with aggregated usage above the benchmark for all of its sites under KU could elect to not participate in KU's DSM program. Similarly, a non-residential customer with aggregated usage above the benchmark for all of its sites under LG&E could elect to not participate in LG&E's DSM program.\textsuperscript{13}

\textsuperscript{13}See Direct Testimony of Kenneth E. Baker, Case No. 2014-00003, p. 7, lines 7-14.
Q. WHAT AGGREGATED LEVEL OF ANNUAL USAGE DOES WALMART RECOMMEND?

A. For purposes of this docket, Walmart recommends a benchmark level of 15 million kWh per year aggregated across all sites in the particular utility territory. This 15 million kWh benchmark is the standard used in Oklahoma.  

Q. SHOULD THE SELF-DIRECT PROGRAM CONTAIN ANY TYPE OF EVALUATION, MEASUREMENT, AND VERIFICATION ("EM&V") PROCEDURE?

A. Walmart would not oppose a reasonable EM&V requirement.

Q. WHAT LEVEL REDUCTION IN ENERGY USAGE WOULD WALMART DEEM REASONABLE?

A. Walmart would not oppose an energy usage reduction requirement equal to any reduction requirement placed upon the Companies. For example, if the Companies were required to achieve an annual reduction of 2.5%, Walmart and other customers that qualify for the self-direct program would have to meet that same percentage across their aggregated load.

Q. HOW SHOULD SELF-DIRECT PROGRAM CUSTOMERS PROVE THEIR REDUCTIONS?

A. Preferably through sworn affidavit; however, if more proof is needed, the self-direct program customer should only report to the Commission or utility, no more than every three years, the DSM/EE implementations and the energy savings. Savings may be

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14 See OAC 165:35-41-3.
1 substantiated by manufacturers' specifications, deemed savings, or other reasonable means.

3 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

4 A. Yes.
VERIFICATION

STATE OF ARKANSAS  
COUNTY OF BENTON

The undersigned, Kenneth E. Baker, being duly sworn, deposes and says that he is Senior Manager Sustainable Regulation for Walmart Inc., and that he has personal knowledge of the matters set forth in the foregoing testimony, and that the answers contained herein are true and correct to the best of his information, knowledge and belief.

[Signature]
Kenneth E. Baker

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 16th day of March 2018.

[Signature]
Notary Public

My Commission Expires:
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EXHIBIT KEB-1 OF

KENNETH E. BAKER

ON BEHALF OF

WAL-MART STORES EAST, LP AND SAM'S EAST, INC.
EXHIBIT KEB-1

New Mexico – Renewable Portfolio Procurement Plan – Docket No. 10-00199-UT; 10-00373-UT

North Carolina – Distributed Generation & EE- Smart Grid – Docket No. E-7 Sub 856; E-100 Sub 123

South Carolina – Smart Grid – Docket No. 2005-385-E

South Carolina – SCE&G DSM/EE – Docket No. 2013-208-E


Missouri – DSM – Cause No. EO-2012-009

Massachusetts – Forward Capacity Market – Docket No. D.P.U. 08-8

Indiana – Energy Efficiency Self Direct – Cause No. 43580

Arizona – Renewable Energy Standard – Docket Nos. E-01345A-10-0394; E-0134A-12-0290; E-01933A-12-0296; E-04204A-12-0297

Kentucky – DSM Docket – Case No. 2014-00003

Georgia – IRP – Docket Nos. 36498; 36499

Florida – DSM – Docket No. 140226-EI

Georgia – DSM – Docket No. 40162

Arkansas Net Metering Docket No. 10-027-U

Colorado – PSCo Demand Side Management Plan – Proceeding No. 17A-0462EG

CERTIFICATE OF SERVICE

I hereby certify that Walmart's March 21, 2018, electronic filing is a true and accurate copy of the Direct Testimony and Exhibit of Kenneth E. Baker to be filed in paper medium; and that on March 21, 2018, the electronic filing has been transmitted to the Commission, and that an original and six copies of the filing 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:

Robert M. Conroy
Vice President – State Regulation and Rates
LG&E and KU Services Company
220 West Main Street
Louisville, KY 40202
robert.conroy@lge-ku.com

Allyson K. Sturgeon, Esq.
Sara V. Judd, Esq.
LG&E and KU Services Company
220 West Main Street
Louisville, KY 40202
Allyson.Sturgeon@lge-ku.com
sara.judd@lge-ku.com

Kendrick R. Riggs, Esq.
W. Duncan Crosby, III, Esq.
Joseph T. Mandlehr, Esq.
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, KY 40202-2828
kendrick.riggs@skofirm.com
duncan.crosby@skofirm.com
joseph.mandlehr@skofirm.com

Rebecca W. Goodman, Esq.
Kent A. Chandler, Esq.
Justin M. McNeil, Esq.
Lawrence W. Cook, Esq.
Office of the Attorney General
Capitol Building, Suite 118
700 Capitol Avenue
Frankfort, KY 40601
Rebecca.Goodman@ky.gov
Kent.Chandler@ky.gov
Justin.mcnell@ky.gov
Larry.Cook@ky.gov

Michael L. Kurtz, Esq.
Kurt J. Boehm, Esq.
Jody Kyler Cohn, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202
MKurtz@bkllawfirm.com
kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

Tom FitzGerald, Esq.
Kentucky Resources Council, Inc.
P.O. Box 1070
Frankfort, KY 40602
FitzKRC@aol.com

Don C. A. Parker (Kentucky I.D. No. 94113)