

**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

**WAL-MART STORES EAST, LP AND SAM'S EAST, INC.'S
REQUESTS FOR INFORMATION TO KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY**

Pursuant to the Commission's May 31, 2018 Order, Wal-Mart Stores East, LP and Sam's East, Inc. ("Walmart") propounds the following Requests for Information on Kentucky Utilities Company, and Louisville Gas and Electric Company (collectively "Companies") and requests that the Companies provide the information and documents requested herein within the time frame permitted by the Commission's Order in this proceeding.

INSTRUCTIONS

1. These requests for information are continuing and require further and supplemental responses if the Companies receive, discover, or generate additional, different, or updated information or documents within their scope after its initial response.

2. If any document or requested information is withheld by the Companies on a claim of privilege or on some other basis, identify: (a) the document withheld and each and every person listed as an addressor, addressee, or indicated on blind copies; (b) all persons to whom the document or information was distributed, shown, or explained; and (c) the nature and legal basis of the privilege or other reason asserted for withholding the document or information.

3. If any document called for has been destroyed or transferred beyond the control of the Companies: (a) identify the person who destroyed it and the person authorizing destruction and state the time, place, and method of, and reasons for its destruction; if destroyed or disposed of by operation of a retention policy, state the retention policy; and, if transferred, identify the person authorizing transfer and state the time, place, and method of, and reason for, the transfer; and (b) identify each and every person listed as an addressor, addressee, or indicated on blind copies, or to whom it was distributed, shown or explained. In addition, identify the date, subject matter, and number of pages of the document and any attachments and appendices thereto.

4. If no documents containing the exact information requested exist, but documents that contain portions thereof or that contain substantially similar information do exist, then the definition of "document" includes the documents that do exist.

5. In responding to each question in the attached interrogatories and requests for production of documents, provide information available from all corporate files of your companies, of all affiliated companies, and of all companies over which your companies exercise control or that exercise control over your companies, as well as from all files of past and present board members, officers, and management-level employees of any such companies.

6. In responding to any of the questions contained in the attached requests for information that require any calculations, analyses, assumptions, or studies, identify and provide copies of such calculations, analyses, assumptions, studies, and all work papers relating thereto.

7. In responding to any of the questions contained in the attached requests for information, please first restate the question asked and also provide the name and title of the person, whether it be a corporate officer or employee, who has responsibility for the subject matter addressed therein.

8. The Companies are requested to provide its responses to these requests for information to the undersigned and to the following:

Carrie M. Harris
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DEFINITIONS

1. “You,” “your,” and “Companies” means Kentucky Utilities Company, and Louisville Gas and Electric Company or any of their officers, directors, employees, attorneys, or agents.

2. “Commission” means the Kentucky Public Service Commission.

3. “Document” includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, microfiche, pictures, data processing cards or discs, computer tapes and other computer-generated and stored information or databases, work papers, calendars, minutes of meetings or any other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.

4. When used in reference to an individual person, “identify,” “identity,” and “identification” mean to state that person’s full name and business address, including zip code and phone number, if known, and present or last known business position and duties, if known.

5. When used in referenced to a document, “identify,” identity,” and “identification” mean to state the type of document (*e.g.*, computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of

identifying it, and its present location and custodian. If any such document was but no long is in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

6. When used in reference to a business organization, “identify,” “identity,” and “Identification” mean to state the corporate name or other names under which the organization does business and the location of its principal place of business.

7. “Describe in detail” and “explain in detail” mean to describe and explain in detail each and every basis for the position taken or statement made and to identify each and every statement, study, and document relied upon by you and to provide a copy of all such identified statements, studies, and documents.

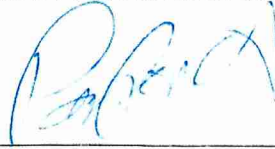
**WAL-MART STORES EAST, LP AND SAM'S EAST, INC.'S
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1. Referring to the Rebuttal Testimony of Rick Lovekamp ("Lovekamp Rebuttal") at page 12, beginning at line 23, where Mr. Lovekamp indicates that the Companies' definition of "energy intensive"...appears more likely to include customers with genuinely energy-intensive processes," please provide, without identifying specific customers, the peak demand and annual electrical usage of each customer who would be eligible to participate in the Industrial Opt-Out as proposed by the Companies in their Application.
2. Referring to the Lovekamp Rebuttal at page 15, beginning at line 7, where Mr. Lovekamp references the language of KRS 278.285(3) and states that "customer classes benefitting from DSM-EE programs should pay for the cost of the programs," please state whether any customers who take service under Rate Schedules TODP, Rate RTS, Rate FLS, IGS, AAGS, SGSS or Rate FT would be ineligible to participate in the Industrial Opt-Out as proposed by the Companies in their Application.
3. If the Companies' answer to Question No. 2 is yes, please identify:
 - (a) the number of customers by rate class who would be ineligible to participate in the Industrial Opt-Out proposed by the Companies in their Application; and
 - (b) whether any of the customers would be eligible to participate in any Demand Side Management ("DSM") programs offered by the Companies?
4. Referring to the Lovekamp Rebuttal at page 9, beginning at line 9, where Mr. Lovekamp claims that Walmart Witness Baker's definition of "industrial" is over-inclusive, please identify:
 - (a) the number of customers by rate class who would be eligible to participate in the Industrial Opt-Out using the definition proposed by the Companies in their Application; and
 - (b) the number customers by rate class who would be eligible to participate in the Industrial Opt-out using the definition proposed by Walmart Witness Mr. Baker in his Direct Testimony.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By



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Counsel to Wal-Mart Stores East, LP and Sam's East, Inc.

Dated: June 7, 2018.

CERTIFICATE OF SERVICE

I hereby certify that Walmart's June 7, 2018, electronic filing is a true and accurate copy of the Wal-Mart Stores East, LP and Sam's East, Inc.'s Requests for Information to Kentucky Utilities Company and Louisville Gas and Electric Company to be filed in paper medium; and that on June 7, 2018, the electronic filing has been transmitted to the Commission, and that an original and six (6) 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:

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