# 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, | ) CASE NO. 2017-00441 |
| AND CONTINUATION OF CERTAIN       | ) CASE NO. 2017-00441 |
| EXISTING DEMAND-SIDE MANAGEMENT   | )                     |
| AND ENERGY EFFICIENCY PROGRAMS    | )                     |

RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND KENTUCKY UTILITIES COMPANY
TO WAL-MART STORES EAST, LP AND SAM'S EAST, INC.'S
REQUESTS FOR INFORMATION
REGARDING REBUTTAL TESTIMONY
DATED JUNE 7, 2018

**FILED: JUNE 14, 2018** 

#### VERIFICATION

| COMMONWEALTH OF KENTUCKY | ) | 00  |
|--------------------------|---|-----|
|                          | ) | SS: |
| COUNTY OF JEFFERSON      | ) |     |

The undersigned, **Rick E. Lovekamp**, being duly sworn, deposes and says that he is Manager – Regulatory Strategy/Policy for Louisville Gas and Electric Company and Kentucky Utilities Company, an employee of LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Rick E. Lovekamp

Notary Public (SEAL)

My Commission Expires:

JUDY SCHOOLER
Notary Public, State at Large, KY
My commission expires July 11, 2018
Notary ID # 512743

Response to Wal-Mart Stores East, LP and Sam's East, Inc.'s
Requests for Information
Regarding Rebuttal Testimony
Dated June 7, 2018

Case No. 2017-00441

**Question No. 1** 

Witness: Rick E. Lovekamp

- Q-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.
- A-1. See attached, which provides the requested information for January 2015 through June 2016 for customers taking service under Rates FLS, RTS, and TODP (to be consistent with the table provided on page 11 of Mr. Lovekamp's testimony), which customers the Companies understood to be industrial as of June 2016. Note that the Companies' proposed opt-out criteria further require that a customer certify that (1) the customer is industrial according to the Companies' proposed definition and (2) the customer has implemented cost-effective energy-efficiency measures not subsidized by other rate classes for each meter the customer seeks to opt out. Therefore, it is not possible for the Companies to know how many customers' meters are fully eligible to opt out under the opt-out criteria the Companies have proposed.

|       |                | Annualized   |
|-------|----------------|--------------|
| Meter | Peak kVA or kW | Volume (kWh) |
| 1     | 23,483         | 141,667,200  |
| 2     | 1,754          | 12,351,996   |
| 3     | 2,279          | 13,577,604   |
| 4     | 3,344          | 19,812,264   |
| 5     | 574            | 216,600      |
| 6     | 4,070          | 24,449,604   |
| 7     | 723            | 4,322,796    |
| 8     | 1,688          | 1,170,396    |
| 9     | 1,186          | 8,244,804    |
| 10    | 1,601          | 7,622,400    |
| 11    | 782            | 3,777,600    |
| 12    | 651            | 624,000      |
| 13    | 7,393          | 48,032,004   |
| 14    | 14,990         | 74,472,000   |
| 15    | 2,568          | 14,337,600   |
| 16    | 865            | 3,373,332    |
| 17    | 23,202         | 166,767,996  |
| 18    | 4,104          | 19,335,996   |
| 19    | 8,824          | 38,676,000   |
| 20    | 601            | 1,267,200    |
| 21    | 912            | 2,489,604    |
| 22    | 872            | 4,322,196    |
| 23    | 102,061        | 649,935,996  |
| 24    | 8,588          | 52,012,800   |
| 25    | 2,480          | 11,978,400   |
| 26    | 4,535          | 272,004      |
| 27    | 7,883          | 816,000      |
| 28    | 1,140          | 2,343,204    |
| 29    | 4,308          | 25,392,000   |
| 30    | 2,919          | 20,425,596   |
| 31    | 723            | 2,310,396    |
| 32    | 7,695          | 52,290,396   |
| 33    | 1,349          | 2,876,400    |
| 34    | 2,019          | 4,849,596    |
| 35    | 4,110          | 22,422,396   |
| 36    | 3,061          | 16,556,400   |
| 37    | 2,427          | 14,072,004   |
| 38    | 325            | 915,996      |
| 39    | 15,203         | 99,243,204   |
| 40    | 2,017          | 13,440,000   |
| 41    | 7,060          | 36,441,996   |
| 42    | 1,489          | 7,926,000    |

| Meter         Peak kVA or kW         Annualized Volume (kWh           43         1,279         5,852,000           44         916         4,953,600           45         16,031         83,027,190           46         1,050         2,691,990           47         604         3,624,000           48         7,155         43,459,200           49         1,096         2,222,400           50         779         4,400,400           51         11,130         71,887,200           52         16,929         64,102,820           53         4,892         26,624,000           54         8,243         52,789,33           55         477         1,053,44           56         1,925         9,536,790           57         575         338,130           58         1,279         6,418,400           59         976         770,000           60         10,907         68,345,600           61         10,035         64,057,590 |
|---|
| Meter         Peak kVA or kW           43         1,279         5,852,000           44         916         4,953,600           45         16,031         83,027,190           46         1,050         2,691,990           47         604         3,624,000           48         7,155         43,459,200           49         1,096         2,222,400           50         779         4,400,400           51         11,130         71,887,200           52         16,929         64,102,820           53         4,892         26,624,000           54         8,243         52,789,333           55         477         1,053,444           56         1,925         9,536,79           57         575         338,13           58         1,279         6,418,40           59         976         770,00           60         10,907         68,345,60  |
| 44       916       4,953,600         45       16,031       83,027,190         46       1,050       2,691,990         47       604       3,624,000         48       7,155       43,459,200         49       1,096       2,222,400         50       779       4,400,400         51       11,130       71,887,200         52       16,929       64,102,820         53       4,892       26,624,000         54       8,243       52,789,33         55       477       1,053,444         56       1,925       9,536,790         57       575       338,130         58       1,279       6,418,400         59       976       770,000         60       10,907       68,345,600  |
| 45       16,031       83,027,190         46       1,050       2,691,990         47       604       3,624,000         48       7,155       43,459,200         49       1,096       2,222,400         50       779       4,400,400         51       11,130       71,887,200         52       16,929       64,102,820         53       4,892       26,624,000         54       8,243       52,789,33         55       477       1,053,440         56       1,925       9,536,790         57       575       338,130         58       1,279       6,418,400         59       976       770,000         60       10,907       68,345,600   |
| 46       1,050       2,691,996         47       604       3,624,006         48       7,155       43,459,206         49       1,096       2,222,406         50       779       4,400,406         51       11,130       71,887,206         52       16,929       64,102,826         53       4,892       26,624,006         54       8,243       52,789,333         55       477       1,053,446         56       1,925       9,536,796         57       575       338,136         58       1,279       6,418,406         59       976       770,006         60       10,907       68,345,606   |
| 47       604       3,624,000         48       7,155       43,459,200         49       1,096       2,222,400         50       779       4,400,400         51       11,130       71,887,200         52       16,929       64,102,820         53       4,892       26,624,000         54       8,243       52,789,33         55       477       1,053,440         56       1,925       9,536,790         57       575       338,130         58       1,279       6,418,400         59       976       770,000         60       10,907       68,345,600   |
| 48       7,155       43,459,200         49       1,096       2,222,400         50       779       4,400,400         51       11,130       71,887,200         52       16,929       64,102,820         53       4,892       26,624,000         54       8,243       52,789,333         55       477       1,053,440         56       1,925       9,536,790         57       575       338,130         58       1,279       6,418,400         59       976       770,000         60       10,907       68,345,600   |
| 49     1,096     2,222,400       50     779     4,400,400       51     11,130     71,887,200       52     16,929     64,102,820       53     4,892     26,624,000       54     8,243     52,789,330       55     477     1,053,440       56     1,925     9,536,790       57     575     338,130       58     1,279     6,418,400       59     976     770,000       60     10,907     68,345,600   |
| 50         779         4,400,400           51         11,130         71,887,200           52         16,929         64,102,820           53         4,892         26,624,000           54         8,243         52,789,33           55         477         1,053,440           56         1,925         9,536,790           57         575         338,130           58         1,279         6,418,400           59         976         770,000           60         10,907         68,345,600   |
| 51     11,130     71,887,200       52     16,929     64,102,820       53     4,892     26,624,000       54     8,243     52,789,33       55     477     1,053,440       56     1,925     9,536,790       57     575     338,130       58     1,279     6,418,400       59     976     770,000       60     10,907     68,345,600  |
| 52     16,929     64,102,82       53     4,892     26,624,00       54     8,243     52,789,33       55     477     1,053,44       56     1,925     9,536,79       57     575     338,13       58     1,279     6,418,40       59     976     770,00       60     10,907     68,345,60   |
| 53     4,892     26,624,00       54     8,243     52,789,33       55     477     1,053,44       56     1,925     9,536,79       57     575     338,13       58     1,279     6,418,40       59     976     770,00       60     10,907     68,345,60   |
| 54     8,243     52,789,33       55     477     1,053,44       56     1,925     9,536,79       57     575     338,13       58     1,279     6,418,40       59     976     770,00       60     10,907     68,345,60  |
| 55     477     1,053,44       56     1,925     9,536,79       57     575     338,13       58     1,279     6,418,40       59     976     770,00       60     10,907     68,345,60   |
| 56     1,925     9,536,796       57     575     338,136       58     1,279     6,418,406       59     976     770,006       60     10,907     68,345,606  |
| 57         575         338,130           58         1,279         6,418,400           59         976         770,000           60         10,907         68,345,600   |
| 58         1,279         6,418,40           59         976         770,00           60         10,907         68,345,60   |
| 59         976         770,004           60         10,907         68,345,604   |
| 60 10,907 68,345,60   |
| <del> </del>  |
| 61 10 025 64 057 50   |
| 61 10,035 64,057,59   |
| 62 14,391 54,619,20   |
| 63 5,289 14,105,60  |
| 64 3,439 18,544,80  |
| 65 2,756 18,110,40  |
| 66 6,465 20,808,00  |
| 67 1,498 8,409,60   |
| 68 1,080 6,427,80   |
| 69 4,217 28,112,00  |
| 70 721 3,827,19   |
| 71 1,992 11,059,20  |
| 72 2,445 8,678,40   |
| 73 7,015 29,361,33  |
| 74 1,177 5,666,40   |
| 75 4,012 14,217,60  |
| 76 750 495,99   |
| 77 2,127 9,015,99   |
| 78 1,972 12,124,80  |
| 79 1,980 9,967,20   |
| 80 2,337 11,022,39  |
| 81 1,428 7,106,19   |
| 82 9,126 57,456,00  |
| 83 307 1,437,600  |
| 84 2,019 8,568,600  |

| Meter         Peak kVA or kW         Annualized Volume (kWh)           85         4,524         23,468,796           86         1,200         4,976,796           87         764         1,526,004           88         6,478         41,925,396           89         1,538         8,002,404           90         1,567         6,423,996           91         4,111         22,804,800           92         1,640         8,198,400           93         403         906,804           94         2,816         16,593,600           95         4,140         11,507,196           96         4,069         18,528,000           97         4,362         31,536,000           98         4,419         29,734,800           99         11,997         47,823,996           100         4,903         26,966,400           101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751 <th></th> <th></th> <th></th>                  |       |                |              |
|--|-------|----------------|--------------|
| Meter         Peak kVA of kW           85         4,524         23,468,796           86         1,200         4,976,796           87         764         1,526,004           88         6,478         41,925,396           89         1,538         8,002,404           90         1,567         6,423,996           91         4,111         22,804,800           92         1,640         8,198,400           93         403         906,804           94         2,816         16,593,600           95         4,140         11,507,196           96         4,069         18,528,000           97         4,362         31,536,000           98         4,419         29,734,800           99         11,997         47,823,996           100         4,903         26,966,400           101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396  |       |                |              |
| 86         1,200         4,976,796           87         764         1,526,004           88         6,478         41,925,396           89         1,538         8,002,404           90         1,567         6,423,996           91         4,111         22,804,800           92         1,640         8,198,400           93         403         906,804           94         2,816         16,593,600           95         4,140         11,507,196           96         4,069         18,528,000           97         4,362         31,536,000           98         4,419         29,734,800           99         11,997         47,823,996           100         4,903         26,966,400           101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800<  | Meter | Peak kVA or kW | volume (kwn) |
| 87         764         1,526,004           88         6,478         41,925,396           89         1,538         8,002,404           90         1,567         6,423,996           91         4,111         22,804,800           92         1,640         8,198,400           93         403         906,804           94         2,816         16,593,600           95         4,140         11,507,196           96         4,069         18,528,000           97         4,362         31,536,000           98         4,419         29,734,800           99         11,997         47,823,996           100         4,903         26,966,400           101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           110         5,662         28,449,60  | 85    | 4,524          | 23,468,796   |
| 88         6,478         41,925,396           89         1,538         8,002,404           90         1,567         6,423,996           91         4,111         22,804,800           92         1,640         8,198,400           93         403         906,804           94         2,816         16,593,600           95         4,140         11,507,196           96         4,069         18,528,000           97         4,362         31,536,000           98         4,419         29,734,800           99         11,997         47,823,996           100         4,903         26,966,400           101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           110         5,662         28,449,600           111         3,513         10,88  | 86    | 1,200          | 4,976,796    |
| 89         1,538         8,002,404           90         1,567         6,423,996           91         4,111         22,804,800           92         1,640         8,198,400           93         403         906,804           94         2,816         16,593,600           95         4,140         11,507,196           96         4,069         18,528,000           97         4,362         31,536,000           98         4,419         29,734,800           99         11,997         47,823,996           100         4,903         26,966,400           101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           110         5,662         28,449,600           111         3,513         10,880,796           112         3,640         26,1  | 87    | 764            | 1,526,004    |
| 90 1,567 6,423,996 91 4,111 22,804,800 92 1,640 8,198,400 93 403 906,804 94 2,816 16,593,600 95 4,140 11,507,196 96 4,069 18,528,000 97 4,362 31,536,000 98 4,419 29,734,800 99 11,997 47,823,996 100 4,903 26,966,400 101 2,099 12,200,796 102 43,083 260,313,048 103 5,243 34,822,404 104 2,029 176,004 105 937 2,657,604 106 751 3,774,396 107 2,059 7,851,996 108 4,111 9,124,800 109 484 2,649,396 110 5,662 28,449,600 111 3,513 10,880,796 112 3,640 26,192,400 113 1,093 6,829,596 114 1,454 9,468,804 115 1,402 4,861,596 116 3,174 7,284,804 117 344 1,339,800 118 1,505 9,936,000 120 4,987 4,700,004 121 5,771 33,862,404 122 11,327 58,612,800 123 395 1,266,804 124 346 80,004 125 1,723 9,437,604   | 88    | 6,478          | 41,925,396   |
| 91   | 89    | 1,538          | 8,002,404    |
| 92         1,640         8,198,400           93         403         906,804           94         2,816         16,593,600           95         4,140         11,507,196           96         4,069         18,528,000           97         4,362         31,536,000           98         4,419         29,734,800           99         11,997         47,823,996           100         4,903         26,966,400           101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           109         484         2,649,396           110         5,662         28,449,600           111         3,513         10,880,796           112         3,640         26,192,400           113         1,093         6,829,596           114         1,454         9,4  | 90    | 1,567          | 6,423,996    |
| 93   | 91    | 4,111          | 22,804,800   |
| 94         2,816         16,593,600           95         4,140         11,507,196           96         4,069         18,528,000           97         4,362         31,536,000           98         4,419         29,734,800           99         11,997         47,823,996           100         4,903         26,966,400           101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           109         484         2,649,396           110         5,662         28,449,600           111         3,513         10,880,796           112         3,640         26,192,400           113         1,093         6,829,596           114         1,454         9,468,804           115         1,402         4,861,596           116         3,174         <  | 92    | 1,640          | 8,198,400    |
| 95   | 93    | 403            | 906,804      |
| 96       4,069       18,528,000         97       4,362       31,536,000         98       4,419       29,734,800         99       11,997       47,823,996         100       4,903       26,966,400         101       2,099       12,200,796         102       43,083       260,313,048         103       5,243       34,822,404         104       2,029       176,004         105       937       2,657,604         106       751       3,774,396         107       2,059       7,851,996         108       4,111       9,124,800         109       484       2,649,396         110       5,662       28,449,600         111       3,513       10,880,796         112       3,640       26,192,400         113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         120       4,987       4,700,004 <td< td=""><td>94</td><td>2,816</td><td>16,593,600</td></td<>  | 94    | 2,816          | 16,593,600   |
| 97   | 95    | 4,140          | 11,507,196   |
| 98       4,419       29,734,800         99       11,997       47,823,996         100       4,903       26,966,400         101       2,099       12,200,796         102       43,083       260,313,048         103       5,243       34,822,404         104       2,029       176,004         105       937       2,657,604         106       751       3,774,396         107       2,059       7,851,996         108       4,111       9,124,800         109       484       2,649,396         110       5,662       28,449,600         111       3,513       10,880,796         112       3,640       26,192,400         113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         <  | 96    | 4,069          | 18,528,000   |
| 99         11,997         47,823,996           100         4,903         26,966,400           101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           109         484         2,649,396           110         5,662         28,449,600           111         3,513         10,880,796           112         3,640         26,192,400           113         1,093         6,829,596           114         1,454         9,468,804           115         1,402         4,861,596           116         3,174         7,284,804           117         344         1,339,800           118         1,505         9,936,000           119         5,684         25,668,000           120         4,987         4,700,004           121         5,771 <t< td=""><td>97</td><td>4,362</td><td>31,536,000</td></t<> | 97    | 4,362          | 31,536,000   |
| 100         4,903         26,966,400           101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           109         484         2,649,396           110         5,662         28,449,600           111         3,513         10,880,796           112         3,640         26,192,400           113         1,093         6,829,596           114         1,454         9,468,804           115         1,402         4,861,596           116         3,174         7,284,804           117         344         1,339,800           118         1,505         9,936,000           119         5,684         25,668,000           120         4,987         4,700,004           121         5,771         33,862,404           122         11,327         <  | 98    | 4,419          | 29,734,800   |
| 101         2,099         12,200,796           102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           109         484         2,649,396           110         5,662         28,449,600           111         3,513         10,880,796           112         3,640         26,192,400           113         1,093         6,829,596           114         1,454         9,468,804           115         1,402         4,861,596           116         3,174         7,284,804           117         344         1,339,800           118         1,505         9,936,000           120         4,987         4,700,004           121         5,771         33,862,404           122         11,327         58,612,800           123         395         1,266,804           124         346         80  | 99    | 11,997         | 47,823,996   |
| 102         43,083         260,313,048           103         5,243         34,822,404           104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           109         484         2,649,396           110         5,662         28,449,600           111         3,513         10,880,796           112         3,640         26,192,400           113         1,093         6,829,596           114         1,454         9,468,804           115         1,402         4,861,596           116         3,174         7,284,804           117         344         1,339,800           118         1,505         9,936,000           119         5,684         25,668,000           120         4,987         4,700,004           121         5,771         33,862,404           122         11,327         58,612,800           123         395         1,266,804           124         346         80  | 100   | 4,903          | 26,966,400   |
| 103       5,243       34,822,404         104       2,029       176,004         105       937       2,657,604         106       751       3,774,396         107       2,059       7,851,996         108       4,111       9,124,800         109       484       2,649,396         110       5,662       28,449,600         111       3,513       10,880,796         112       3,640       26,192,400         113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604   | 101   | 2,099          | 12,200,796   |
| 104         2,029         176,004           105         937         2,657,604           106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           109         484         2,649,396           110         5,662         28,449,600           111         3,513         10,880,796           112         3,640         26,192,400           113         1,093         6,829,596           114         1,454         9,468,804           115         1,402         4,861,596           116         3,174         7,284,804           117         344         1,339,800           118         1,505         9,936,000           119         5,684         25,668,000           120         4,987         4,700,004           121         5,771         33,862,404           122         11,327         58,612,800           123         395         1,266,804           124         346         80,004           125         1,723         9,437,604  | 102   | 43,083         | 260,313,048  |
| 105       937       2,657,604         106       751       3,774,396         107       2,059       7,851,996         108       4,111       9,124,800         109       484       2,649,396         110       5,662       28,449,600         111       3,513       10,880,796         112       3,640       26,192,400         113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604  | 103   | 5,243          | 34,822,404   |
| 106         751         3,774,396           107         2,059         7,851,996           108         4,111         9,124,800           109         484         2,649,396           110         5,662         28,449,600           111         3,513         10,880,796           112         3,640         26,192,400           113         1,093         6,829,596           114         1,454         9,468,804           115         1,402         4,861,596           116         3,174         7,284,804           117         344         1,339,800           118         1,505         9,936,000           119         5,684         25,668,000           120         4,987         4,700,004           121         5,771         33,862,404           122         11,327         58,612,800           123         395         1,266,804           124         346         80,004           125         1,723         9,437,604  | 104   | 2,029          | 176,004      |
| 107       2,059       7,851,996         108       4,111       9,124,800         109       484       2,649,396         110       5,662       28,449,600         111       3,513       10,880,796         112       3,640       26,192,400         113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604  | 105   | 937            | 2,657,604    |
| 108       4,111       9,124,800         109       484       2,649,396         110       5,662       28,449,600         111       3,513       10,880,796         112       3,640       26,192,400         113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604  | 106   | 751            | 3,774,396    |
| 109       484       2,649,396         110       5,662       28,449,600         111       3,513       10,880,796         112       3,640       26,192,400         113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604  | 107   | 2,059          | 7,851,996    |
| 110       5,662       28,449,600         111       3,513       10,880,796         112       3,640       26,192,400         113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604  | 108   | 4,111          | 9,124,800    |
| 111       3,513       10,880,796         112       3,640       26,192,400         113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604   | 109   | 484            | 2,649,396    |
| 112       3,640       26,192,400         113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604  | 110   | 5,662          | 28,449,600   |
| 113       1,093       6,829,596         114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604   | 111   | 3,513          |              |
| 114       1,454       9,468,804         115       1,402       4,861,596         116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604   | 112   | 3,640          | 26,192,400   |
| 115     1,402     4,861,596       116     3,174     7,284,804       117     344     1,339,800       118     1,505     9,936,000       119     5,684     25,668,000       120     4,987     4,700,004       121     5,771     33,862,404       122     11,327     58,612,800       123     395     1,266,804       124     346     80,004       125     1,723     9,437,604   | 113   | 1,093          | 6,829,596    |
| 116       3,174       7,284,804         117       344       1,339,800         118       1,505       9,936,000         119       5,684       25,668,000         120       4,987       4,700,004         121       5,771       33,862,404         122       11,327       58,612,800         123       395       1,266,804         124       346       80,004         125       1,723       9,437,604   | 114   | 1,454          | 9,468,804    |
| 117     344     1,339,800       118     1,505     9,936,000       119     5,684     25,668,000       120     4,987     4,700,004       121     5,771     33,862,404       122     11,327     58,612,800       123     395     1,266,804       124     346     80,004       125     1,723     9,437,604   | 115   | 1,402          | 4,861,596    |
| 118     1,505     9,936,000       119     5,684     25,668,000       120     4,987     4,700,004       121     5,771     33,862,404       122     11,327     58,612,800       123     395     1,266,804       124     346     80,004       125     1,723     9,437,604   | 116   | 3,174          | 7,284,804    |
| 119     5,684     25,668,000       120     4,987     4,700,004       121     5,771     33,862,404       122     11,327     58,612,800       123     395     1,266,804       124     346     80,004       125     1,723     9,437,604   | 117   | 344            | 1,339,800    |
| 120     4,987     4,700,004       121     5,771     33,862,404       122     11,327     58,612,800       123     395     1,266,804       124     346     80,004       125     1,723     9,437,604  | 118   | 1,505          | 9,936,000    |
| 121     5,771     33,862,404       122     11,327     58,612,800       123     395     1,266,804       124     346     80,004       125     1,723     9,437,604  | 119   | 5,684          |              |
| 122     11,327     58,612,800       123     395     1,266,804       124     346     80,004       125     1,723     9,437,604   | 120   |                | 4,700,004    |
| 123     395     1,266,804       124     346     80,004       125     1,723     9,437,604   | 121   | 5,771          | 33,862,404   |
| 124     346     80,004       125     1,723     9,437,604   | 122   | 11,327         | 58,612,800   |
| 125 1,723 9,437,604  |       | 395            | 1,266,804    |
|  | 124   | 346            | 80,004       |
| 126 846 3,401,604  | 125   | 1,723          | 9,437,604    |
|  | 126   | 846            | 3,401,604    |

| Meter | Peak kVA or kW | Annualized<br>Volume (kWh) |
|-------|----------------|----------------------------|
| 127   | 1,025          | 4,320,000                  |
| 128   | 1,959          | 11,281,596                 |
| 129   | 1,925          | 9,135,996                  |
| 130   | 11,014         | 69,292,800                 |
| 131   | 6,331          | 35,856,000                 |
| 132   | 3,204          | 18,222,396                 |
| 133   | 442            | 661,200                    |
| 134   | 681            | 1,958,400                  |
| 135   | 6,342          | 24,288,000                 |
| 136   | 1,654          | 10,306,800                 |
| 137   | 27,427         | 134,720,004                |
| 138   | 1,494          | 7,011,204                  |
| 139   | 3,084          | 15,180,804                 |
| 140   | 4,029          | 14,667,600                 |
| 141   | 6,129          | 32,931,204                 |
| 142   | 1,226          | 7,529,604                  |
| 143   | 5,448          | 15,615,996                 |
| 144   | 2,974          | 7,248,000                  |
| 145   | 615            | 3,307,200                  |
| 146   | 6,349          | 28,160,328                 |
| 147   | 7,185          | 51,179,580                 |
| 148   | 1,742          | 10,396,800                 |
| 149   | 30,656         | 201,087,996                |
| 150   | 497            | 882,396                    |
| 151   | 3,993          | 8,403,204                  |
| 152   | 5,948          | 40,027,200                 |
| 153   | 3,079          | 15,315,204                 |
| 154   | 22,204         | 153,849,600                |
| 155   | 1,605          | 6,494,400                  |
| 156   | 877            | 2,495,472                  |
| 157   | 2,026          | 10,495,200                 |
| 158   | 8,912          | 57,139,200                 |
| 159   | 14,948         | 91,670,400                 |
| 160   | 7,092          | 49,843,200                 |
| 161   | 9,220          | 59,995,200                 |
| 162   | 2,539          | 16,718,400                 |
| 163   | 1,163          | 3,164,004                  |
| 164   | 6,668          | 33,948,240                 |
| 165   | 621            | 3,540,804                  |
| 166   | 9,450          | 73,728,000                 |
| 167   | 5,732          | 30,591,996                 |
| 168   | 1,483          | 8,886,000                  |

|       |                | Annualized   |
|-------|----------------|--------------|
| Meter | Peak kVA or kW | Volume (kWh) |
| 169   | 1,209          | 5,999,196    |
| 170   | 1,225          | 6,992,004    |
| 171   | 5,421          | 31,065,600   |
| 172   | 320            | 1,612,404    |
| 173   | 844            | 3,084,396    |
| 174   | 1,194          | 5,681,400    |
| 175   | 2,547          | 4,745,604    |
| 176   | 14,022         | 82,806,396   |
| 177   | 12,659         | 53,926,404   |
| 178   | 3,101          | 17,094,000   |
| 179   | 4,240          | 27,555,204   |
| 180   | 3,081          | 12,398,400   |
| 181   | 5,463          | 16,028,004   |
| 182   | 1,450          | 2,149,596    |
| 183   | 916            | 2,594,400    |
| 184   | 1,609          | 9,065,604    |
| 185   | 2,766          | 7,289,604    |
| 186   | 2,640          | 13,219,200   |
| 187   | 405            | 2,038,404    |
| 188   | 38,800         | 248,618,904  |
| 189   | 3,625          | 21,382,404   |
| 190   | 14,456         | 63,168,000   |
| 191   | 1,155          | 2,057,604    |
| 192   | 1,481          | 3,433,596    |
| 193   | 6,001          | 14,372,088   |
| 194   | 1,275          | 5,522,400    |
| 195   | 3,020          | 18,240,000   |
| 196   | 1,182          | 3,435,204    |
| 197   | 1,371          | 7,043,196    |
| 198   | 1,170          | 6,663,204    |
| 199   | 2,732          | 11,577,600   |
| 200   | 1,245          | 4,465,320    |
| 201   | 4,947          | 35,631,600   |
| 202   | 4,119          | 29,766,396   |
| 203   | 1,174          | 4,588,800    |
| 204   | 586            | 2,768,400    |
| 205   | 828            | 4,099,200    |
| 206   | 1,756          | 12,539,196   |
| 207   | 821            | 4,532,796    |
| 208   | 2,522          | 14,169,600   |
| 209   | 879            | 4,724,400    |
| 210   | 534            | 1,132,800    |

|       |                | Annualized   |
|-------|----------------|--------------|
| Meter | Peak kVA or kW | Volume (kWh) |
| 211   | 494            | 2,482,404    |
| 212   | 450            | 1,386,804    |
| 213   | 1,138          | 3,449,604    |
| 214   | 3,841          | 14,578,668   |
| 215   | 252            | 1,054,404    |
| 216   | 3,377          | 19,746,000   |
| 217   | 814            | 2,132,796    |
| 218   | 3,942          | 22,437,600   |
| 219   | 504            | 1,523,604    |
| 220   | 1,491          | 8,126,400    |
| 221   | 1,356          | 7,193,604    |
| 222   | 1,497          | 2,651,196    |
| 223   | 3,065          | 9,947,196    |
| 224   | 846            | 3,345,600    |
| 225   | 8,227          | 57,696,000   |
| 226   | 11,676         | 73,752,000   |
| 227   | 871            | 5,268,804    |
| 228   | 76,238         | 458,724,000  |
| 229   | 1,528          | 3,679,200    |
| 230   | 490            | 1,127,436    |
| 231   | 1,221          | 3,297,600    |
| 232   | 562            | 1,663,620    |
| 233   | 648            | 243,900      |
| 234   | 1,079          | 5,797,440    |
| 235   | 1,077          | 5,901,300    |
| 236   | 619            | 316,800      |
| 237   | 2,507          | 3,676,116    |
| 238   | 1,328          | 2,080,800    |
| 239   | 297            | 450,000      |
| 240   | 5,176          | 32,482,476   |
| 241   | 14,043         | 87,667,200   |
| 242   | 250            | 388,800      |
| 243   | 250            | 155,376      |
| 244   | 12,397         | 39,770,184   |
| 245   | 1,444          | 2,520,000    |
| 246   | 10,334         | 44,184,960   |
| 247   | 450            | 576,000      |
| 248   | 37,500         | 34,594,560   |
| 249   | 2,564          | 5,004,000    |
| 250   | 303            | 823,680      |
| 251   | 1,125          | 5,947,200    |
| 252   | 336            | 864,000      |
| ·     |                | ·            |

| Meter | Peak kVA or kW | Annualized<br>Volume (kWh) |
|-------|----------------|----------------------------|
| 253   | 540            | 828,000                    |
| 254   | 250            | 441,600                    |
| 255   | 375            | 453,600                    |
| 256   | 1,500          | 43,200                     |
| 257   | 7,908          | 51,811,200                 |
| 258   | 1,062          | 2,946,660                  |
| 259   | 192,168        | 522,949,497                |

Response to Wal-Mart Stores East, LP and Sam's East, Inc.'s
Requests for Information
Regarding Rebuttal Testimony
Dated June 7, 2018

Case No. 2017-00441

Question No. 2

Witness: Rick E. Lovekamp

- Q-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.
- A-2. Yes, a customer with a meter served under any of those rates would not be eligible to opt out that meter if the customer does not certify that (1) the customer is industrial according to the Companies' proposed definition and (2) the customer has implemented cost-effective energy-efficiency measures not subsidized by other rate classes regarding that meter.

Response to Wal-Mart Stores East, LP and Sam's East, Inc.'s
Requests for Information
Regarding Rebuttal Testimony
Dated June 7, 2018

Case No. 2017-00441

Question No. 3

Witness: Rick E. Lovekamp

- Q-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?
- A-3. (a) See the response to Question No. 2. It is not possible for the Companies to know how many customers or meters would be ineligible to opt out.
  - (b) Customers ineligible to opt out would be eligible to participate in any DSM-EE programs offered to such customers. LG&E does not offer, and has not proposed to offer, DSM-EE programs to customers served under Rates IGS, AAGS, SGSS, and FT. Therefore, those customers do not pay any DSM-EE charges.

Response to Wal-Mart Stores East, LP and Sam's East, Inc.'s
Supplemental Data Requests
Regarding Rebuttal Testimony
Dated June 7, 2018

Case No. 2017-00441

**Question No. 4** 

Witness: Rick E. Lovekamp

- Q-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.

A-4.

(a) See the table below for the number of customers served under Rates FLS, RTS, TODP, IGS, AAGS, SGSS, and FT. Please note that the numbers of meters shown in the table below for Rates FLS, RTS, and TODP are for customers the Companies understood to be industrial as of June 2016; the meter counts for Rates IGS, AAGS, FT, and SGSS are as of December 2017:

|       | Number of Eligible |  |
|-------|--------------------|--|
| Rates | Meters             |  |
| FLS   | 1                  |  |
| RTS   | 39                 |  |
| TODP  | 219                |  |
| IGS   | 246                |  |
| AAGS  | 4                  |  |
| FT    | 65                 |  |
| SGSS  | 1                  |  |

Note that the Companies' proposed opt-out criteria further require that a customer certify that (1) the customer is industrial according to the Companies' proposed definition and (2) the customer has implemented cost-effective energy-efficiency measures not subsidized by other rate classes for each meter the customer seeks to opt out. Therefore, it is not possible for the Companies to know how many customers' meters are fully eligible to opt out under the opt-out criteria the Companies have proposed.

(b) See the table below for the number of customers served under Rates FLS, RTS, TODP, and TODS as of June 2016:

|       | Number of Total |  |
|-------|-----------------|--|
| Rates | Eligible Meters |  |
| FLS   | 1               |  |
| RTS   | 39              |  |
| TODP  | 358             |  |
| TODS  | 986             |  |