

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

**ELECTRONIC APPLICATION OF KENTUCKY
UTILITIES COMPANY FOR AN ADJUSTMENT OF ITS
ELECTRIC RATES**

CASE NO. 2018-00294

**WALMART INC.'S RESPONSES TO LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S REQUEST FOR INFORMATION TO WALMART INC.**

REQUEST:

1. Refer to page 23 the testimony of Gregory W. Tillman, at which he proposes that one quarter of any reduction in the revenue requirement increase should be applied to proportionately reduce the Company's proposed increase on the non-lighting classes with a current RROR greater than 100 percent.
 - a. Precisely identify what classes of customers are considered "lighting classes" for the purposes of Mr. Tillman's testimony (e.g., Lighting Energy, Traffic Energy, Lighting Service, Restricted Lighting Service, Outdoor Sports Lighting, etc.).
 - b. Explain the rationale for Mr. Tillman's proposal in which he suggests that twenty-five percent of any reduction in the revenue requirement increase should not be applied to reduce the Company's proposed increase on the nonlighting classes.

RESPONSE:

1.
 - a. For purposes of Mr. Tillman's testimony, the "lighting classes" include Lighting Energy Service or Rate, Traffic Energy Service or Rate, Lighting and Restricted Lighting, and Outdoor Sports Lighting.
 - b. The purpose in Mr. Tillman's proposal is to provide a meaningful reduction in intraclass subsidies that presently exist between rate classes. Lighting classes were not specifically included in Mr. Tillman's proposal for a variety of reasons, including the fact that as a percentage of the Company's total revenue requirement, the lighting classes make up only a small percentage of the total. By applying 25 percent of any reduction in the revenue requirement to the major, non-lighting

classes with a RROR greater than 100 percent, the Commission can make a greater impact on reducing intra-class subsidies.


RESPONDENT: Counsel and Gregory W. Tillman, Senior Manager, Energy Regulatory Analysis

VERIFICATION

STATE OF ARKANSAS
COUNTY OF BENTON

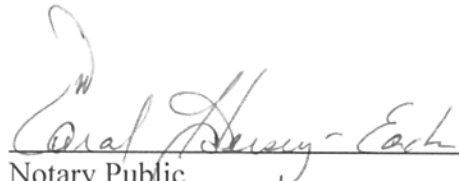
)
) SS:
)

The undersigned, Gregory W. Tillman, being duly sworn, deposes and says that he is Senior Manager, Energy Regulatory Analysis for Walmart Inc., and that he has personal knowledge of the matters set forth in the foregoing Responses, and that the answers contained herein is true and correct to the best of his information, knowledge, and belief.



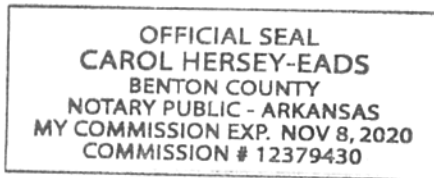
Gregory W. Tillman

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 4th day of February, 2019.



Notary Public (SEAL)

My Commission Expires: 01/08/2020



CERTIFICATE OF SERVICE

I hereby certify that Walmart Inc.'s February 14, 2019, electronic filing is a true and accurate copy of the Walmart Inc.'s Responses to Lexington-Fayette Urban County Government's Requests for Information to Walmart Inc. to be filed in paper medium; and that on February 14, 2019, the electronic filing has been transmitted to the Commission, and that an original and one (1) copy 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

Rick E. Lovekamp
Manager – Regulatory Strategy/Policy
LG&E and KU Services Company
220 West Main Street
Louisville, KY 40202
rick.lovekamp@lge-ku.com

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

Lindsey W. Ingram, III, Esq.
Monica H. Braun, Esq.
Gerald E. Wuetcher, Esq.
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, KY 40507-1801
l.ingram@skofirm.com
monica.braun@skofirm.com
gerald.wuetcher@skofirm.com

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

Iris G. Skidmore, Esq.
Bates and Skidmore
415 W. Main Street, Suite 2
Frankfort, KY 40601
batesandskidmore@gmail.com

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

Emily W. Medlyn, Esq.
U.S. Army Legal Services Agency
Regulatory Law Office (JALS-RL/IP)
9275 Gunston Road
Fort Belvoir, VA 22060-4446
emily.w.medlyn.civ@mail.mil

G. Houston Parrish, Esq.
Office of the Staff Judge Advocate
Building 1310, Room 218
50 3rd Avenue
Fort Knox, KY 40121-5230
glenn.h.parrish.civ@mail.mil

Laurence J. Zielke, Esq.
Janice M. Theriot, Esquire
Zielke Law Firm, PLLC
1250 Meidinger Tower
462 South 4th Street
Louisville, KY 40202
lzielke@zielkefirm.com
jtheriot@zielkefirm.com

Paul Werner, Esq.
Hannah Wigger, Esq.
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 100
Washington, DC 20006-6801
pwerner@sheppardmullin.com
hwigger@sheppardmullin.com

Joe F. Childers, Esq.
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, KY 40507
joe@jchilderslaw.com

Matthew E. Miller, Esq.
Sierra Club
50 F Street, NW, Eighth Floor
Washington, DC 20001
matthew.miller@sierraclub.org

Tony Mendoza, Esq.
Sierra Club
2101 Webster Street, 13th Floor
Oakland, CA 94612
tony.mendoza@sierraclub.org

Matthew R. Malone, Esq.
William H. May, Esq.
Hurt, Deckard & May PLLC
127 West Main Street
Lexington, KY 40507
mmalone@hdmfirm.com
bmay@hdmfirm.com

James W. Gardner, Esq.
M. Todd Osterloh, Esq.
Sturgill, Turner, Barker & Moloney, PLLC
333 W. Vine Street, Suite 1500
Lexington, KY 40507
jgardner@sturgillturner.com
tosterloh@sturgillturner.com

Janet Graham, Esq.
David J. Barberie, Esq.
Andrea C. Brown, Esq.
Department of Law
200 East Main Street
Lexington, KY 40507
jgraham@lexingtonky.gov
dbarberie@lexingtonky.gov
abrown2@lexingtonky.gov



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