#### 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

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC RATES

CASE NO. 2018-00295

WALMART INC. AND THE KROGER COMPANY'S RESPONSES TO KENTUCKY UTILITIES COMPANY'S AND LOUISVILLE GAS AND ELECTRIC COMPANY'S DATA REQUESTS PROPOUNDED TO WALMART INC. AND THE KROGER COMPANY

Walmart Inc. ("Walmart") and The Kroger Company ("Kroger"), by and through counsel, hereby submit the following Responses to Data Requests of Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E") propounded to Kroger and Walmart. The submittal of these Responses does not constitute a waiver of the right of Kroger or Walmart to object to or appeal the Order entered by the Kentucky Public Service Commission on November 9, 2018, granting full intervention to both parties on a joint basis rather than on an individual basis, and stating that Kroger and Walmart are to be considered one party rather than individual parties:

## REQUEST TO KROGER / JUSTIN BIEBER:

1. Please provide a complete list of cases, including case numbers, in which you have testified before regulatory commissions in the last ten years. Please provide copies of your testimony in each case.

## **RESPONSE OF KROGER:**

Please see attached Resume of Justin Bieber. Copies of Mr. Bieber's testimony filed in state commission proceedings can generally be found on the websites maintained by those commissions.

**RESPONDENT**: Counsel and Justin Bieber, Senior Consultant, Energy Strategies, LLC.

# REQUEST TO WALMART/GREGORY W. TILLMAN:

2. Provide copies of all electronic files in native format with formulas intact used in your analysis. This includes copies of all work papers supporting your testimony, analyses, and conclusions.

## **RESPONSE OF WALMART:**

Please see attached Excel files " $KU_2018-00294_Tillman_Workpapers.xlsx$ " and " $LGE_2018-00295_Tillman_Workpapers.xlsx$ ".

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

### VERIFICATION

STATE OF ARKANSAS	)	
	)	SS
COUNTY OF BENTON	)	

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

Notary Public

Subscribed and sworn to before me, a Notary Public in and before said County and State, this  $//\sqrt[4]{}$  day of February, 2019.

My Commission Expires: 🍿 / 08/8020

OFFICIAL SEAL
CAROL HERSEY-EADS
BENTON COUNTY
NOTARY PUBLIC - ARKANSAS
MY COMMISSION EXP. NOV 8, 2020
COMMISSION # 12379430

### **CERTIFICATE OF SERVICE**

I hereby certify that Walmart Inc. and The Kroger Company's February 14, 2019, electronic filing is a true and accurate copy of the Walmart Inc. and The Kroger Company's Responses to Kentucky Utilities Company's and Louisville Gas and Electric Company's Data Requests Propounded to Walmart Inc. and The Kroger Company 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:

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