

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTONIC APPLICATION OF LOUISVILLE GAS	)	
AND ELECTRIC COMPANY FOR AN ADJUSTMENT	)	CASE NO. 2018-00295
OF ITS ELECTRIC AND GAS RATES	)	

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**LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT’S REQUEST FOR  
INFORMATION TO WALMART, INC.**

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In accordance with the Public Service Commission’s (“Commission”) October 11, 2018, Order, Intervenor Louisville/Jefferson County Metro Government (“Louisville Metro”) propounds the following data requests upon the Walmart, Inc. (“Walmart”). Walmart shall respond to these requests in accordance with the provisions of the Commission’s October 11, 2018, Order, applicable regulations, and the instructions set forth below.

**INSTRUCTIONS**

1. Please provide written responses, together with any and all exhibits pertaining thereto, separately indexed and tabbed by each response.
2. The responses provided should restate Louisville Metro’s request and also identify the witness(es) responsible for supplying the information.
3. If any request appears confusing, please request clarification directly from counsel for Louisville Metro.
4. Please answer each designated part of each information request separately. If you do not have complete information with respect to any item, please so state and give as much

information as you do have with respect to the matter inquired about, and identify each person whom you believe may have additional information with respect thereto.

5. To the extent that the specific document, workpaper, or information does not exist as requested, but a similar document, workpaper, or information does exist, provide the similar document, workpaper, or information.

6. To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout which would not be self-evident to a person not familiar with the printout.

7. If Walmart objects to any request on any grounds, please notify counsel for Louisville Metro as soon as possible.

8. For any document withheld on the basis of privilege, state the following: date; author; addressee; blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

9. In the event any document called for has been destroyed or transferred beyond the control of the company, state the following: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

10. These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

Respectfully submitted,



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that the January 31, 2019, electronic filing of this document is a true and accurate copy of the same document being filed in paper medium; that the electronic filing will be transmitted to the Commission on January 31, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of the Notice of Filing will be delivered to the Commission within two business days.



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Counsel for Louisville Metro

### **Requests for Information**

1. Refer to page 22 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 non-lighting classes.