

**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, A CERTIFICATE OF PUBLIC)	
CONVENIENCE AND NECESSITY TO)	
DEPLOY ADVANCED METERING)	CASE NO. 2020-00349
INFRASTRUCTURE, APPROVAL OF)	
CERTAIN REGULATORY AND)	
ACCOUNTING TREATMENTS, AND)	
ESTABLISHMENT OF A ONE-YEAR)	
SURCREDIT)	

**WALMART INC.'S SUPPLEMENTAL REQUESTS FOR INFORMATION TO
KENTUCKY UTILITIES COMPANY**

Pursuant to the Kentucky Public Service Commission's ("Commission") December 9, 2020 Order, Walmart Inc. ("Walmart") propounds the following Requests for Information on Kentucky Utilities Company ("Company") and requests that the Company 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 Company receives, discovers, or generates 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 Company 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 Company: (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 requests for information, provide information available from all corporate files of the Company, of all affiliated companies, and of all companies over which the Company exercises control or that exercises control over the Company, 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 Company is requested to provide its responses to these requests for information to the undersigned and to the following:

Carrie H. Grundmann
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DEFINITIONS

1. "You," "your," and "Company" means Kentucky Utilities Company or any of its 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.

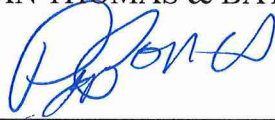
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1. Please refer to the Direct Testimony of Eileen L. Saunders. At Ex. ELS-1, p. 13, the document states in reference to tools available to customers with an AMI meter that customers will be able to "[d]ownload or export data to spreadsheets to Green Button Download enabled products to facilitate additional review or analysis." Further, at Ex. ELS-2, p. 12, the Company states that it will create a portal that "[p]rovides customers the ability to download usage data in various formats, including Green Button format, which is the national standard."
 - a. Do the phrases "Green Button Download" or "Green Button format" as set forth in the exhibits to Ms. Saunders' testimony mean a broader system that would enable "Connect My Data," or does the Company only intend to provide Green Button "Download My Data" capabilities?
 - b. Is there a plan to enable third-party access to customer usage data such as through API or through Green Button Connect My Data?

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By



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Counsel to Walmart Inc.

Dated: February 5, 2021

CERTIFICATE OF SERVICE

I hereby certify that Walmart's February 5, 2021, electronic filing is a true and accurate copy of Walmart Inc.'s Supplemental Request for Information to Kentucky Utilities Company; and that on February 5, 2021, the electronic filing has been transmitted to the Commission. Pursuant to the Commission's Order dated March 24, 2020, in Case No. 2020-00085, and in accord with all other applicable law, counsel certifies that an electronic copy of the foregoing was served by email to the following. A physical copy of the filing will be submitted to the Commission within 30 days after the Governor lifts the current State of Emergency.

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