# 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	) CASE NO. 2020-00349
METERING INFRASTRUCTURE, APPROVAL	) CASE NO. 2020-00349
OF CERTAIN REGULATORY AND	)
ACCOUNTING TREATMENTS, AND	)
ESTABLISHMENT OF A ONE-YEAR	)
SURCREDIT	)

# RESPONSE OF KENTUCKY UTILITIES COMPANY TO INITIAL REQUESTS FOR INFORMATION OF WALMART INC. DATED JANUARY 8, 2021

FILED: JANUARY 22, 2021

#### VERIFICATION

#### **COMMONWEALTH OF KENTUCKY**) ) **COUNTY OF JEFFERSON** )

The undersigned, Robert M. Conroy, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates, for Kentucky Utilities Company and Louisville Gas and Electric Company and 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.

**Robert M. Conroy** 

Subscribed and sworn to before me, a Notary Public in and before said County

and State, this <u>20th</u> day of 2021. January

Notary Public

603967 Notary Public ID No.

My Commission Expires:

July 11, 2022

### **KENTUCKY UTILITIES COMPANY**

## Response to Initial Requests for Information of Walmart Inc. Dated January 8, 2021

#### Case No. 2020-00349

#### **Question No. 1**

### **Responding Witness: Robert M. Conroy**

- Q-1. Please provide the Company's initial and revised responses to all formal or informal requests for information made by any party to this proceeding when that response is provided to the requesting party, including any responses already provided to any party.
- A-1. Under 807 KAR 5:001 Section 8, KU requested, and the Commission approved, the use of electronic filing procedures in this proceeding. Walmart Inc. consented to the use of those procedures. All documents are filed electronically and provided to all parties of record.

### **KENTUCKY UTILITIES COMPANY**

## Response to Initial Requests for Information of Walmart Inc. Dated January 8, 2021

### Case No. 2020-00349

#### **Question No. 2**

### **Responding Witness: Robert M. Conroy**

- Q-2. To the extent the Company files corrections, revisions, amendments, supplemental information, and/or errata to its originally filed case, please provide all updated materials including the Company's testimony, exhibits, schedules, workpapers and models.
- A-2. Under 807 KAR 5:001 Section 8, KU requested, and the Commission approved, the use of electronic filing procedures in this proceeding. Walmart Inc. consented to the use of those procedures. All documents are filed electronically and provided to all parties of record.

# **KENTUCKY UTILITIES COMPANY**

# Response to Initial Requests for Information of Walmart Inc. Dated January 8, 2021

#### Case No. 2020-00349

#### **Question No. 3**

# **Responding Witness: Robert M. Conroy**

- Q-3. Please provide all workpapers in electronic spreadsheet format with formulas intact, where available, supporting each of the figures, tables, and exhibits accompanying the Company's filing and supporting testimony.
- A-3. See the response and attachments to PSC 1-56 and PSC 1-57.