

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 INFRASTRUCTURE, APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS, AND ESTABLISHMENT OF A ONE-YEAR SURCREDIT

CASE NO. 2020-00349

IN THE MATTER OF:

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES, A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO DEPLOY ADVANCED METERING INFRASTRUCTURE, APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS, AND ESTABLISHMENT OF A ONE-YEAR SURCREDIT

CASE NO. 2020-00350

THE KROGER CO.'S RESPONSES TO JOINT DATA REQUESTS OF KENTUCKY UTILITIES COMPANY AND LOUISVILLE GAS AND ELECTRIC COMPANY

The Kroger Co. (“Kroger”), by and through counsel, hereby submits the following response to the Joint Data Requests of Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”).

Data Requests

Justin Bieber

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

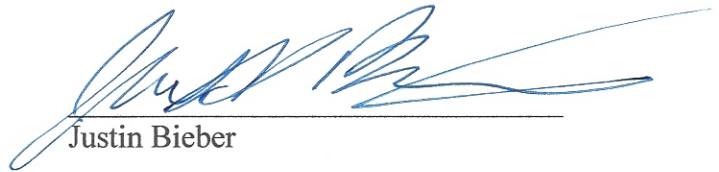
RESPONSE:

Mr. Bieber relied on the Companies' filing, workpapers, and responses to data requests to support his testimony, as well as other publicly available documents cited in Mr. Bieber's testimony. See also the Answers to Commission Staff's First Request for Information to The Kroger Co. Mr. Bieber does not have additional workpapers to support his testimony, analyses, or conclusions.

VERIFICATION

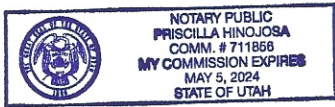
STATE OF UTAH)
)
COUNTY OF SALT LAKE)

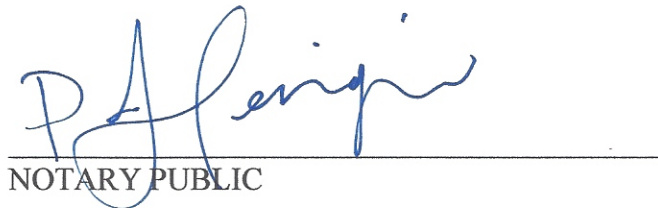
The undersigned, **Justin Bieber**, being duly sworn, deposes and says that he is a Senior Consultant in the firm of Energy Strategies, LLC, that he has personal knowledge of the matters set forth in the foregoing response, and that the answers contained therein are true and correct to the best of his information, knowledge and belief.


Justin Bieber

Subscribed and sworn to before me this 1st day of April, 2021, by Justin Bieber.

My commission expires: May 5, 2024




NOTARY PUBLIC

[SEAL]

April 1, 2021

Respectfully submitted,

/s/ Robert C. Moore

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COUNSEL FOR THE KROGER CO.

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing is a true and accurate copy of the document being filed with the Commission in paper medium; that the electronic filing was transmitted to the Commission on April 1, 2021; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's Orders entered in Case No. 2020-00085, Electronic Emergency Docket Related to the Novel Coronavirus COVID-19, a deviation has been granted excusing this party from filing with the Commission an original copy of this filing as normally required by 807 KAR 5:001, Section 8(12)(a)(2). However, the original copy shall be filed with the Commission within 30 days of the lifting of the state of emergency.

/s/ Robert C. Moore

Robert C. Moore