

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
AMERICAN ELECTRIC POWER)	
COMPANY, INC., KENTUCKY POWER)	CASE NO. 2021-00481
COMPANY AND LIBERTY UTILITIES CO.)	
FOR APPROVAL OF THE TRANSFER OF)	
OWNERSHIP AND CONTROL OF)	
KENTUCKY POWER COMPANY)	

**WALMART INC.'S
INITIAL REQUESTS FOR INFORMATION TO
LIBERTY UTILITIES COMPANY**

Pursuant to the Kentucky Public Service Commission's ("Commission") January 6, 2022, Order, Walmart Inc. ("Walmart") propounds the following Requests for Information on Liberty 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
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
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DEFINITIONS

1. "You," "your," and "Company" means Liberty 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.

**WALMART INC.'S INITIAL REQUESTS FOR INFORMATION
TO LIBERTY UTILITIES COMPANY**

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.
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.
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.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

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Counsel to Walmart Inc.

Dated: January 13, 2022

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon parties and/or counsel of record in this proceeding by electronic mail (when available) or by first-class mail, unless otherwise noted, this 13th day of January, 2022, to the following:

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