

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE)	
ENERGY KENTUCKY, INC. FOR (1) AN)	
ADJUSTMENT OF ELECTRIC RATES;)	CASE NO. 2022-00372
(2) APPROVAL OF NEW TARIFFS;)	
(3) APPROVAL OF ACCOUNTING)	
PRACTICES TO ESTABLISH)	
REGULATORY ASSETS AND LIABILITIES;)	
AND (4) ALL OTHER REQUIRED)	
APPROVALS AND RELIEF)	

RESPONSES OF
WALMART INC. TO
DUKE ENERGY KENTUCKY, INC.'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

DATED APRIL 7, 2023

CASE NO. 2022-00372

**Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of
Interrogatories and Requests for Production of Documents**

Dated April 7, 2023

Question No. 1

Responding Witness: Steve W. Chriss

1. Other than Mr. Chriss, please identify any persons, including experts, whom Walmart has consulted or retained with regard to evaluating Duke Energy Kentucky's Application in this proceeding.

RESPONSE: Walmart did not consult or retain any other persons, including experts, with regard to evaluating Duke Energy Kentucky's ("Duke") Application in this proceeding.

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**Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of
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Dated April 7, 2023

Question No. 2

Responding Witness: Steve W. Chriss

2. For each person identified in response to Interrogatory No. 1 above, please state:
 - a. the subject matter of the discussions/consultations/evaluations;
 - b. the written opinions of such persons regarding Duke Energy Kentucky's Application;
 - c. the facts to which each person relied upon; and
 - d. a summary of the person's qualifications to render such discussions/consultations/evaluations.

RESPONSE: Not applicable (see response to Interrogatory No. 1).

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Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of Interrogatories and Requests for Production of Documents

Dated April 7, 2023

Question No. 3

Responding Witness: Steve W. Chriss

3. For each person identified in response to Interrogatory No. 1 above, please identify all proceedings in all jurisdictions in which the witness/person has offered evidence, including but not limited to, pre-filed testimony, sworn statements, and live testimony or analysis. For each response, please provide the following:
 - a. the jurisdiction in which the testimony, statement, or analysis was pre-filed, offered, given, or admitted into the record;
 - b. the administrative agency and/or court in which the testimony, statement, or analysis was pre-filed, offered, admitted, or given;
 - c. the date(s) the testimony, statement, or analysis was pre-filed, offered, admitted, or given;
 - d. the identifying number for the case or proceeding in which the testimony, statement, or analysis was pre-filed, offered, admitted, or given; and
 - e. whether the person was cross-examined.

RESPONSE: Not applicable (see response to Interrogatory No. 1).

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**Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of
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Dated April 7, 2023

Question No. 4

Responding Witness: Steve W. Chriss

4. Identify and provide all documents or other evidence that Walmart may seek to introduce as exhibits or for purposes of witness examination in the above-captioned matter.

RESPONSE: Walmart is still evaluating and has not yet decided whether it will seek to introduce certain documents as exhibits or for purposes of witness examination in the above-captioned matter.

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Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of Interrogatories and Requests for Production of Documents

Dated April 7, 2023

Question No. 5

Responding Witness: Steve W. Chriss

5. Please identify all proceedings in all jurisdictions in the last three years in which Mr. Chriss has offered evidence, including but not limited to, pre-filed testimony, sworn statements, and live testimony or analysis. For each response, please provide the following:
 - a. the jurisdiction in which the testimony, statement, or analysis was prefiled, offered, given, or admitted into the record;
 - b. the administrative agency and/or court in which the testimony, statement, or analysis was pre-filed, offered, admitted, or given;
 - c. the date(s) the testimony, statement, or analysis was pre-filed, offered, admitted, or given;
 - d. the identifying number for the case or proceeding in which the testimony, statement, or analysis was pre-filed, offered, admitted, or given;
 - e. whether the witness was cross-examined;
 - f. the custodian of the transcripts and pre-filed testimony, statements, or analysis for each proceeding; and
 - g. copies of all such testimony, statements, or analysis.

RESPONSE: Please reference Mr. Chriss's Witness Qualification Statement, Exhibit SWC-1 to his Direct Testimony, for the requested information. Any additional information requested from subsections "e" through "g" is publicly available.

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Dated April 7, 2023

Question No. 6

Responding Witness: Steve W. Chriss

6. Please provide copies of any and all documents, analysis, summaries, white papers, work papers, spreadsheets (electronic versions with cells intact), including drafts thereof, as well as any underlying supporting materials created by Mr. Chriss as part of his evaluation of Duke Energy Kentucky's Application or used in the creation of Mr. Chriss's testimony.

RESPONSE: Electronic copies of all schedules, tables, and charts are being electronically provided to counsel contemporaneously with these responses.

CASE NO. 2022-00372

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Dated April 7, 2023

Question No. 7

Responding Witness: Steve W. Chriss

7. Please provide copies of any and all documents not created by Mr. Chriss, including but not limited to, analysis, summaries, cases, reports, and evaluations, that Mr. Chriss relied upon, referred to, or used in the development of his testimony.

RESPONSE: Not applicable. Mr. Chriss created all documents relied upon, referred to, or used in the development of his testimony.

CASE NO. 2022-00372

Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of Interrogatories and Requests for Production of Documents

Dated April 7, 2023

Question No. 8

Responding Witness: Steve W. Chriss

8. Please provide any and all studies, analysis, and presentations that Mr. Chriss has created or publicly made within the last three years that involve utility regulation, ratemaking, cost of service, rate of return, or fossil-fired electric generation unit retirements that are discussed in Mr. Chriss's testimony.

RESPONSE: Walmart objects to Request No. 8 to the extent it seeks production of internal Walmart documents as those documents have no relevance to the Company's Application. Subject to the foregoing objection, Walmart states that Mr. Chriss assisted in the creation and presentation of slides for a Duke North Carolina rate design webinar; however, Mr. Chriss is not in possession of such slides. Additionally, Mr. Chriss made a presentation on rates during an Edison Electric Institute webinar, and the slides are attached as "EEI NKA Rates Primer".

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Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of Interrogatories and Requests for Production of Documents

Dated April 7, 2023

Question No. 9

Responding Witness: Steve W. Chriss

9. Please provide a copy of Exhibit SWC-3 in native Excel format, with all formulas intact.

RESPONSE: Copies of the exhibits attached to Mr. Chriss' Direct Testimony are being produced in native format with all formulas intact. Additionally, Walmart is also producing Corrected Exhibit SWC-3 in native Excel format. Exhibit SWC-3 was corrected because the summaries incorrectly referenced Arizona rather than Kentucky. In all other respects, Corrected Exhibit SWC-3 is identical to Exhibit SWC-3 that was attached to Mr. Chriss' Direct Testimony.

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**Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of
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Dated April 7, 2023

Question No. 10

Responding Witness: Steve W. Chriss

10. Confirm that the data used on Exhibit SWC-2 and SWC-4 is base period data and not forecast period data.

RESPONSE: Mr. Chriss used both base period data and forecast period data. As such, counsel is electronically providing Corrected Exhibits SWC-2 and SWC-4 to counsel contemporaneously with these responses, which is based on forecast period data.

CASE NO. 2022-00372

Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of Interrogatories and Requests for Production of Documents

Dated April 7, 2023

Question No. 11

Responding Witness: Steve W. Chriss

11. Confirm that using the forecast period data on Exhibit SWC-2, the testimony of Witness Chriss page 7, beginning at Line 13, should have read: "Yes. Using the Company's proposed rate base, capital structure, cost of debt, and fair value adjustment in this case, the impact on the Company's proposed revenue requirement is approximately \$9.1 million, or 12 percent of the proposed revenue deficiency of \$75.2 million. See Exhibit SWC-2." If the response is in the negative, please explain why not.

RESPONSE: Exhibit SWC-2 contained a mixture of forecast period data and test period data. To correct that error, Walmart is providing the Corrected Direct Testimony of Steve W. Chriss, which incorporates revisions to Exhibits SWC-2 and SWC-4 as addressed in Interrogatory No. 10. As corrected, Mr. Chriss' testimony now reads as follows: "Yes. Using the Company's proposed rate base, capital structure, and cost of debt, the impact on the Company's proposed revenue requirement is approximately \$9.1 million, or 12 percent of the proposed revenue deficiency of \$75.2 million. See Exhibit SWC-2."

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Dated April 7, 2023

Question No. 12

Responding Witness: Steve W. Chriss

12. Confirm that the forecast period data on Exhibit SWC-4, the testimony of Witness Chriss page 11, beginning at Line 8, should have read: "The difference in revenue requirement is approximately \$6.1 million, or 8.1 percent of the Company's proposed revenue deficiency. See Exhibit SWC-4." If the response is in the negative, please explain.

RESPONSE: Exhibit SWC-2 contained a mixture of forecast period data and test period data. To correct that error, Walmart is providing the Corrected Direct Testimony of Steve W. Chriss, which incorporates revisions to Exhibits SWC-2 and SWC-4 as addressed in Interrogatory No. 10. The testimony now reads as follows: "The difference in revenue requirement is approximately \$6.1 million, or 8.0 percent of the Company's proposed revenue deficiency. *See* Exhibit SWC-4."

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**Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of
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Dated April 7, 2023

Question No. 13

Responding Witness: Steve W. Chriss

13. Please state whether there are any agreements between Walmart and any Intervening Party to the above-captioned proceeding, or any member or affiliate of an Intervening Party to the proceeding, that concern said proceeding. For purposes of this Interrogatory, "intervening party" includes any party to have filed a motion to intervene in the above-captioned proceeding. To the extent that Walmart contends that any such documents are privileged, please provide a privilege log for the same.

RESPONSE: None.

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**Walmart Inc.'s Responses to Duke Energy Kentucky, Inc.'s First Set of
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Dated April 7, 2023

Question No. 14

Responding Witness: Steve W. Chriss

14. Please state whether there are any agreements between Walmart and any entity exhibiting interest in the above-captioned proceeding, or any member or affiliate of an entity exhibiting interest to the proceeding, that concern said proceeding. For purposes of this Interrogatory, "entity exhibiting interest" includes any party that has not filed a motion to intervene in the above-captioned proceeding. To the extent that Walmart contends that any such documents are privileged, please provide a privilege log for the same.

RESPONSE: None.

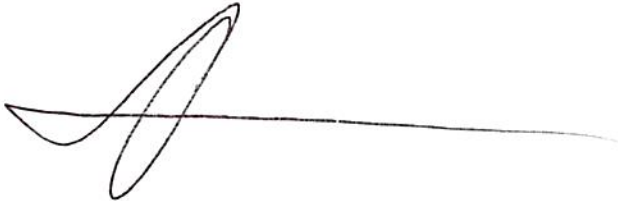
VERIFICATION

In the Matter of:

ELECTRONIC APPLICATION OF DUKE)
 ENERGY KENTUCKY, INC. FOR (1) AN)
 ADJUSTMENT OF ELECTRIC RATES;) CASE NO. 2022-00372
 (2) APPROVAL OF NEW TARIFFS;)
 (3) APPROVAL OF ACCOUNTING)
 PRACTICES TO ESTABLISH)
 REGULATORY ASSETS AND LIABILITIES;)
 AND (4) ALL OTHER REQUIRED)
 APPROVALS AND RELIEF)


STATE OF ARKANSAS)
)
 COUNTY OF BENTON)

The undersigned, Steve W. Chriss, being duly sworn, deposes and says that he is Director, Energy Services for Walmart Inc., and that he has personal knowledge of the matters set forth in the foregoing Responses, and that the answers contained herein is true and correct to the best of his information, knowledge, and belief.

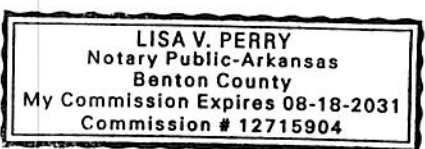


 Steve W. Chriss

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 7th day of April, 2023.

 (SEAL)
 Notary Public

My Commission Expires: 8/18/2031



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 7th day of April, 2023, to the following:

Sarah E. Lawler
Rocco O. D'Ascenzo
Larisa Vaysman
Duke Energy Kentucky, Inc.

139 East Fourth Street
Cincinnati, OH 45202
Sarah.lawler@duke-energy.com

Rocco.dascenzo@duke-energy.com
Larisa.vaysman@duke-energy.com

Elizabeth M. Brama
Valerie T. Herring
Taft Stettinius & Hollister LLP
2200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
ebrama@taftlaw.com
vherring@taftlaw.com

Angela M. Goad
J. Michael West
Lawrence W. Cook
John G. Horne II
Office of the Attorney General
700 Capital Avenue, Suite 20
Frankfort, KY 40601-8204
Angela.Goad@ky.gov
Michael.West@ky.gov
Larry.Cook@ky.gov
John.Horne@ky.gov

Joe F. Childers
Childers & Baxter, PLLC
300 Lexington Building
201 West Short Street
Lexington, KY 40507
joe@jchilderslaw.com

Joshua Smith
Sierra Club
2101 Webster St., Suite 1300
Oakland, CA 94612
Joshua.smith@sierraclub.org

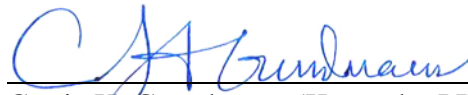
Kathryn Huddleston
Sierra Club
6406 N I-35, Suite 1805
Austin, TX 78752
Kate.huddleston@sierraclub.org

Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com

James W. Gardner
M. Todd Osterloh
Rebecca C. Price
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street, Suite 1500
Lexington, KY 40507
jgardner@sturgillturner.com
tosterloh@sturgillturner.com
rprice@sturgillturner.com

Certificate of Service
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Paul Werner
Hannah Wigger
Maria Laura Coltre
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW
Suite 100
Washington, DC 20006
pwerner@sheppardmullin.com
hwigger@sheppardmullin.com
mcoltre@sheppardmullin.com



Carrie H. Grundmann (Kentucky I.D. No. 99197)