

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

In the Matter of:

ELECTRONIC JOINT APPLICATION OF)	
KENTUCKY UTILITIES COMPANY AND)	
LOUISVILLE GAS AND ELECTRIC)	CASE NO. 2022-00402
COMPANY FOR CERTIFICATES OF)	
PUBLIC CONVENIENCE AND NECESSITY)	
AND SITE COMPATIBILITY)	
CERTIFICATES AND APPROVAL OF)	
DEMAND SIDE MANAGEMENT PLAN)	

**WALMART INC.'S
SUPPLEMENTAL REQUESTS FOR INFORMATION TO
KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY**

Pursuant to the Kentucky Public Service Commission's ("Commission") January 6, 2023, Order, Walmart Inc. ("Walmart") propounds the following Requests for Information on Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LG&E") (collectively, "Companies") and requests that the Companies 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 Companies receive, discover, or generate 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 Companies 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 Companies: (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 Companies, of all affiliated companies, and of all companies over which the Companies exercises control or that exercises control over the Companies, 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 Companies are requested to provide their responses to these requests for information to the undersigned and to the following:

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DEFINITIONS

1. "You," "your," and "Companies" means Kentucky Utilities Company and Louisville Gas and Electric Company or any of their 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
SUPPLEMENTAL REQUESTS FOR INFORMATION TO
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LOUISVILLE GAS AND ELECTRIC COMPANY**

1. As it relates to the natural gas combined cycle ("NGCC") units proposed for approval in this proceeding, please answer the following questions:
 - a. According to the Direct Testimony of Lonnie E. Bellar, p. 11, lines 19-23, "[a]ll OEMs that provide NGCC technology are designing their gas turbines to combust hydrogen in the future should it become economically viable or mandated." Will the NGCC units proposed for approval in this proceeding be capable of co-firing with hydrogen?
 - b. If the answer to 1(a) is no, please explain why not, and identify all costs, whether estimated or actual, associated with retrofitting these units in the future to co-fire with hydrogen.
2. Have the Companies quantified potential benefits to ratepayers associated with the Inflation Reduction Act ("IRA") as it relates to the projects proposed in the Companies' Application?
3. Please reference the Direct Testimony of Stuart A. Wilson, p. 14, lines 1-8 concerning the use of the PLEXOS model to develop the least-cost resource portfolios.
 - a. Did the Companies perform any out-of-model steps and/or impose out-of-model constraints on PLEXOS?
 - b. If so, please describe all such forced inputs, limitations, or out-of-model constraints and the reason(s) for each such input or limitation.
4. Please reference the Direct Testimony of Stuart A. Wilson, p. 14, lines 19-20 concerning the use of SERVM to test the portfolios' reliability.
 - a. Did the Companies perform any out-of-model steps and/or impose out-of-model constraints on SERVM?
 - b. If so, please describe all such forced inputs, limitations, or out-of-model constraints and the reason(s) for each such input or limitation.

5. Please reference the Direct Testimony of David S. Sinclair, p. 19, line 15 to p. 20, line 15 concerning the risks regarding the power purchase agreements ("PPAs") proposed for approval in this proceeding and answer the following:
- a. Are any costs of these PPAs being recovered by customers prior to these projects coming online?
 - b. If so, please explain all such costs.
 - c. In the event a PPA is terminated and costs are recovered from customers prior to the project coming online, how will such costs be refunded to customers?

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 
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Counsel to Walmart Inc.

Dated: April 14, 2023

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 14th day of April, 2023, to the following:

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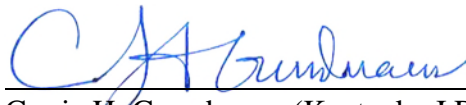
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