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 AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	**)**	**CASE NO. 2025-00113**

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE GAS AND ELECTRIC COMPANY FOR AN ADJUSTMENT OF ITS ELECTRIC AND GAS RATES AND APPROVAL OF CERTAIN REGULATORY AND ACCOUNTING TREATMENTS	**)**	**CASE NO. 2025-00114**

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

Pursuant to the Kentucky Public Service Commission's ("Commission") June 18, 2025, Order, Walmart Inc. ("Walmart") propounds the following Requests for Information on Kentucky Utilities Company ("KU") and Louisville Gas and Electric Company ("LGE") (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 their 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 exercise control or that exercise 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 its 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.

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TO KENTUCKY UTILITIES COMPANY

1. Please provide all workpapers in electronic spreadsheet format with formulas intact, where available, supporting each of the figures, tables, and exhibits accompanying the Companies' filings and supporting testimony.

2. Please identify the location of the electronic workpapers with all formulas intact for the Companies' Cost of Service Study ("COSS"), including but not limited to the proof of revenue and unit cost study. If those documents have not already been produced, please produce them.

3. Please refer to the Direct Testimony of Robert Conroy at p. 4, lines 1-15 and provide a breakdown of how the $1 billion in investment in the transmission system is being spent as between these identified categories: (a) proactively replace system components, (b) connect new customers, (c) expand the system, and (d) ensure reliability.

4. With respect to the Companies' request for regulatory deferral accounting for vegetation management costs associated with storm damage restoration (*see* Direct Testimony of Robert Conroy at p. 9, line 22 to p. 10, line 7), please explain in detail how the Companies will ensure that that the vegetation management costs are related solely to storm damage and/or major storms.

5. Please refer to the Direct Testimony of Christopher Garrett at p. 4, lines 21-22 and explain why it is in the best interest of – and least cost for – KU and LGE customers to pay for mutual assistance from PPL Corporation affiliates located in Rhode Island and Pennsylvania versus utilities that are more geographically proximate to KU/LGE's service territories.

6. Please refer to the Direct Testimony of Christopher Garrett at p. 6, line 4 to p. 8, line 3, where the Companies discuss the benefits of a future merger of KU/LGE and quantify the "minor financial" benefits and "substantial administrative and regulatory benefits" to ratepayers of a merger.

7. With respect to the request for a five-year amortization of the "Glendale Megasite," as discussed in the Direct Testimony of Christopher Garrett at p. 8, lines 14-15 and p. 14, line 13 to p. 15, line 6, please explain why these costs should be borne by all customers rather than Blue Oval.

8. Please refer to the "Extremely High Load Factor" rate schedule ("Rate EHLF") as discussed in the Direct Testimony of Michael Hornung and answer the following:

    a. Under what circumstances would Rate EHLF apply to an existing customer?

    b. For customers with multiple locations within the Companies' service territory, will the Companies aggregate the customers' load to satisfy the 100 MVA threshold?

9. Please confirm that the Companies' currently authorized return on equity is 9.45 percent.

10. Please refer to the Direct Testimony of Dylan D'Ascendis at p. 2, lines 21-23 and Table 1, p. 4; *see also* Exhibit DWD-1, pp. 1-2, where Mr. D'Ascendis supports a 10.95 percent ROE and answer the following:

    a. Identify any case(s) where a state or federal regulatory commission has authorized an ROE that was 75 basis points or higher from the ROE awarded in the Companies' prior rate cases, including in your response the applicable commission, docket number, and date of the decision.

    b. Identify any state or federal regulatory commission that has adopted the specific ROE recommended by Mr. D'Ascendis, including in your response the applicable commission, docket number, and date of the decision.

11. Please refer to the Direct Testimony of Dylan D'Ascendis at p. 12, line 20 to p. 13, line 5 where Mr. D'Ascendis applies a "non-price regulated proxy group" and identify any state or federal regulatory commission that has expressly adopted or expressly rejected the use of a "non-price regulated proxy group," including in your response the applicable commission, docket number, and date of the decision.

12. Please explain whether Mr. D'Ascendis' ROE analysis included any consideration of the Companies' plans to pursue a merger. If not, please explain.

13. Please refer to the Direct Testimony of Dylan D'Ascendis at p. 14, lines 6-7 and explain what Mr. D'Ascendis means when he says he analyzes whether a potential proxy group has "cut" a dividend in the prior five-year period.

14. Please refer to the Direct Testimony of Dylan D'Ascendis at p. 20, lines 20-23, and explain whether Mr. D'Ascendis did anything to verify that his proxy group members, in fact, increased their dividends at different times throughout the year.

15. Please refer to the Direct Testimony of Dylan D'Ascendis at p. 40, line 24 to p. 41, line 2 and produce the source data and workpapers underlying the calculated long-term treasury rate.

16. Please produce the Value Line Investment Survey identified under "Sources of Information" for Exhibit DWD-11 to the Direct Testimony of Dylan D'Ascendis.

17. Please refer to the Direct Testimony of Charles Schram at p. 12, lines 17-19 and explain where the two identified "economic development projects" stand in the contracting process, including whether they have signed an ESA.

18. Please refer to the Direct Testimony of Daniel Johnson at p. 18, lines 14-21 and explain whether the costs stated therein assume a merger of KU/LGE. If not, please explain what, if any, impact a merger would have on these assumed costs.

19. Please refer to the Direct Testimony of Daniel Johnson at p. 17, line 1 to p. 18, line 2 and explain whether the Companies expect to have Green Button Connect My Data capabilities under the new system.

20. Please refer to the Direct Testimony of Elizabeth McFarland at p. 24, line 17 to p. 25, line 8 and explain what cost are being recovered directly from the customer and whether any costs are proposed to be recovered from other ratepayers.

21. Please refer to the Direct Testimony of Peter Waldrab at p. 18, line 14 to p. 19, line 7 and explain whether these new customers are funding any of the costs identified therein. If yes, please specify in detail what costs are recovered specifically from the new customer versus what costs are recovered from other ratepayers.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By _____

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Counsel to Walmart Inc.

Dated: July 3, 2025

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 3rd day of July, 2025, to the following:

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