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 SUPPLEMENTAL 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 Supplemental 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:

Carrie H. Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
cgrundmann@spilmanlaw.com

Steven W. Lee
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
slee@spilmanlaw.com

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 INITIAL REQUESTS FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY

1. Please refer to the Company's response to Walmart Set 1-13 and answer the following:

   a. Did Mr. D'Ascendis exclude a potential proxy group company if they lowered their common dividend one time from one quarter to the next? If not, what time periods (quarterly, annually or some other frequency) were considered when assessing if a proxy group company "lowered their common dividend relative to the prior common dividend"?

   b. Was the determination to "cut" a proxy group company made whenever a proxy group company "lowered their common dividend relative to the prior common dividend" regardless of the materiality or amount the dividend was "cut"?

2. Please refer to the Company's response to Walmart Set 1-17 and answer the following:

   a. Does the Company need to add new generation resources in order to provide electric service to these two economic development projects? If so, please identify all such projects.

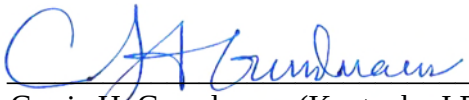
   b. Is the customer affiliated with the "second project" contractually obligated to execute a contract for electric service?

   c. If the answer to subpart (2) is "no," will other ratepayers be subject to costs incurred by the Companies to construct the necessary infrastructure to provide electric service to the Customer's project? Please quantify all such costs.

3. Please refer to the Company's response to Walmart Set 1-21 and explain how much – expressed as a percentage – new customers are paying "to recover the investment required to serve those new customers."

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

Carrie H. Grundmann (Kentucky I.D. No. 99197)
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
Phone: (336) 631-1051
Fax: (336) 725-4476
Email: cgrundmann@spilmanlaw.com

Steven Wing-Kern Lee
1100 Bent Creek Blvd., Suite 101
Mechanicsburg, PA 17050

Phone: (717) 791-2012
Fax: (717) 795-2743
Email: slee@spilmanlaw.com

Counsel to Walmart Inc.

Dated: July 31, 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 31st day of July, 2025, to the following:

Robert M. Conroy
Rick E. Lovekamp
LG&E and KU Services Company
2701 Eastpoint Parkway
Louisville, KY 40223
Robert.conroy@lge-ku.com
Rick.lovecamp@lge-ku.com

Allyson K. Sturgeon
Sara V. Judd
PPL Services Corporation
2701 Eastpoint Parkway
Louisville, KY 40223
asturgeon@pplweb.com
svjudd@pplweb.com

W. Duncan Crosby, III
Stoll Keenon Ogden PLLC
400 West Market Street, Suite 2700
Louisville, KY 40202
Duncan.crosby@skofirm.com

Lindsey W. Ingram, III
Stoll Keenon Ogden PLLC
300 West Vine Street, Suite 2100
Lexington, KY 40507
l.ingram@skofirm.com

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

Michael L. Kurtz
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@bkllawfirm.com
jkylercohn@bkllawfirm.com

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

Kyle J. Smith
U.S. Army Legal Services Agency
Environmental Law Divisions (JALS-ELD)
9275 Gunnston Road
Fort Belvoir, VA 22060-4446
kyle.j.smith124.civ@army.mil

James Brannon Dupree
U.S. Army Legal Services Agency
50 Third Ave.
Building 1310 – Pike Hall
Fort Knox, KY 40121
james.b.dupree1.civ@army.mil

Randal A. Strobo
David E. Spenard
Strobo Barkley PLLC
730 West Main Street, Suite 200
Louisville, KY 40202
rstrobo@strobobarkley.com
dspendard@strobobarkley.com

Joe F. Childers
Bethany Baxter
Childers & Baxter, PLLC
The Lexington Building
201 West Short Street, Suite 300
Lexington, KY 40507
joe@childerslaw.com
bethany@childerslaw.com

Nathaniel T. Shoaff
Sierra Club
2101 Webster Street, Suite 1300
Oakland, CA 94612
Nathaniel.shoaff@sierraclub.org

Kurt J. Boehm
Boehm, Kurtz & Lowry
425 Walnut Street, Suite 2400
Cincinnati, OH 45202
kboehm@bkllawfirm.com

Byron L. Gary
Tom FitzGerald
Ashley Wilmes
Kentucky Resources Council
P.O. Box 1070
Frankfort, KY 40602
byron@kyrc.org
fitzkrc@aol.com
ashley@kyrc.org

Paul Werner
Hannah Wigger
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 100
Washington, DC 20006
pwerner@sheppardmullin.com
hwigger@sheppardmullin.com

David J. Barberie
Gabriel Thatcher
Lexington-Fayette Urban County
Government 200 East Main Street
Lexington, KY 40507
dbarberi@lexingtonky.gov
gthatcher@lexingtonky.gov

Jeff Derouen
Quang Nguyen
First Trust Centre
200 S. 5th St. Suite 200N
Louisville, KY 40202
jeff.derouen@louisvilleky.gov
quang.nguyen@louisvilleky.gov

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