

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND
ELECTRIC COMPANY FOR AN ADJUSTMENT
OF ELECTRIC AND GAS BASE RATES

)
)
) CASE NO. 2009-00549
)
)

RESPONSE OF THE KROGER COMPANY TO
FIRST DATA REQUEST OF LOUISVILLE GAS AND ELECTRIC COMPANY

VERIFICATION

STATE OF UTAH)
)
COUNTY OF SALT LAKE) SS:

The undersigned, being duly sworn, deposes and says that he is Senior Consultant, Energy Strategies, LLC, that he has personal knowledge of the matters set forth in the foregoing testimony and exhibits, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Neal Townsend

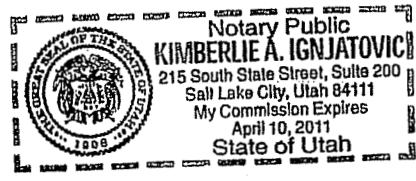
Neal Townsend

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 19th day of May, 2010.

Kimberlie A. Ignjatovic (SEAL)

Notary Public

My Commission Expires:
April 10, 2011



LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response of The Kroger Company to
First Data Request Of Louisville Gas and Electric Company**

Responding Witness: Neal Townsend

Item 1.

To the extent not previously provided, please provide electronic copies (on CD) of all tables, charts, Diagrams, schedules, and exhibits (collectively, "Exhibits") contained in the testimony of all witnesses for Kroger. Please include all workpapaers, schedules, underlying computations and supporting documentation used and relied upon by each witness in the preparation of his or her testimony, including the preparation of all Exhibits. Please provide all electronic spreadsheets with cell formulas, cell references, macros and VBA code intact.

Response 1:

Please see the attached electronic folder labeled "Kroger Response to LG&E Data Request No. 1"

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response of The Kroger Company to
First Data Request Of Louisville Gas and Electric Company**

Responding Witness: Neal Townsend

Item 2.

To the extent not previously provided, please provide copies of all schedules and underlying computations and workpapers developed in the analysis by Kroger and/or its witness(es) of the Companies' requested rate increase in electronic spreadsheet format with all formulas intact. This request includes, but is not limited to, the analyses of the revenue requirement components and computations, including all ratemaking adjustments to the historic data, and the cost of service model.

Response:

Please see Kroger's response to LG&E Data Request No. 1.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2009-00549

**Response of The Kroger Company to
First Data Request Of Louisville Gas and Electric Company**

Responding Witness: Neal Townsend

Item 3.

Mr. Townsend's testimony refers to Consumers Energy Company and Detroit Edison conjunctive demand/generation aggregation pilot programs in Michigan. Please provide all information Mr. Townsend relied upon, and any other information Mr. Townsend is aware of and can provide, concerning these programs, including, but not limited to, relevant tariff sheets, administrative filings, and regulatory commission orders. Please confirm that the programs to which Mr. Townsend's testimony refers are active programs for customers of Consumer Energy Company and Detroit Edison.

Response:

The programs to which Mr. Townsend's testimony refers, Consumers Energy's generation aggregation program (GAP) and Detroit Edison's experimental load aggregation program (ELAP), are active programs. Please see the attached electronic folder labeled "Kroger Response to KU Data Request No. 3" This folder contains two subfolders: Consumers' GAP and Detroit Edison's ELAP with Michigan Commission Orders in their entirety as well as relevant tariff sheets. For specific references to the GAP program please see page 83 in Commission's Opinion and Order Implementing GAP (Docket U-15245), page 53 in the Commission's Order containing the Compliance Tariff (Docket U-15245), and Current Tariff Sheet No. D-32.00. For more detail regarding ELAP please refer to page 8 of Commission's Order Approving ELAP Implementation (Docket U-14838) as well as pages 5-6 in Attachment A to the Order in Docket U-14838. ELAP's extension was further approved in Docket U-15768 – please see page 78 of the Commission's Order Approving ELAP Extension and tariff sheets D-25.00 and D-32.00 in the Commission's Order containing the Compliance Tariff (Docket U-15768). Detroit Edison's tariff book containing currently effective tariff sheets D-25.00 and D-32.00 is also provided.