

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR (1) A GENERAL)	
ADJUSTMENT OF ITS RATES FOR ELECTRIC)	CASE NO.
SERVICE; (2) AN ORDER APPROVING ITS 2017)	2017-00179
ENVIRONMENTAL COMPLIANCE PLAN; (3) AN)	
ORDER APPROVING ITS TARIFFS AND RIDERS;)	
(4) AN ORDER APPROVING ACCOUNTING)	
PRACTICES TO ESTABLISH REGULATORY)	
ASSETS AND LIABILITIES; AND (5) AN ORDER)	
GRANTING ALL OTHER REQUIRED APPROVALS)	
AND RELIEF)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO WAL-MART STORES EAST, LP AND SAM'S EAST, INC.

Wal-Mart Stores East, LP and Sam's East, Inc. (jointly "Walmart"), pursuant to 807 KAR 5:001, are to file with the Commission the original with six copies in paper medium and an electronic version of the following information. The information requested herein is due on or before November 3, 2017. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and

accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Walmart shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Walmart fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, Walmart shall, in accordance with 807 KAR 5:001, section 4 (10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Steve W. Chriss. Explain whether Option A of the proposed Renewable Power Rider allows Walmart to achieve Walmart's corporate renewable energy goals.

2. Refer to the Direct Testimony of Gregory W. Tillman, Exhibit GWT-3. Provide this exhibit in Excel spreadsheet format with all formulas intact and unprotected and with all columns and row accessible.

3. Explain whether any of Walmart's facilities within the Kentucky Power Company service territory participate directly or indirectly through a third party in any energy-efficiency program or market administered by PJM Interconnection, L.L.C. If so, explain the nature of the program or market, the aggregate size of the load that is participating, and the name of each third-party aggregator.



Gwen R. Pinson
Executive Director
Public Service Commission
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DATED OCT 26 2017

cc: Parties of Record

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