

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES COMPANY FOR AN ADJUSTMENT OF	)	CASE NO.
ITS ELECTRIC RATES AND APPROVAL OF	)	2025-00113
CERTAIN REGULATORY AND ACCOUNTING	)	
TREATMENTS	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO WALMART, INC.

Walmart, Inc. (Walmart), pursuant to 807 KAR 5:001, shall file with the Commission an electronic version of the following information. The information requested is due on September 23, 2025. The Commission directs Walmart to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and 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

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<sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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 Walmart obtains information that indicates the response was incorrect or incomplete when made or, though correct or complete when made, is now incorrect or incomplete in any material respect.

For any request to which Walmart fails or refuses to furnish all or part of the requested information, Walmart shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied and scanned 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. 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 Lisa V. Perry (Perry Direct Testimony), page 16, lines 21-22. Confirm that Walmart believes that rates, and therefore revenue, should be allocated in accordance with the results of the Cost-of-Service Study (COSS).

2. Refer to the Perry Direct Testimony, page 20, lines 4-10. Explain whether Walmart believes that the Time of Day – Secondary rate should reflect the rate supported in the COSS.

3. Refer to Perry Direct Testimony, page 32-35. Explain how public is defined within the context of this testimony.
4. Refer to Perry Direct Testimony, page 33, lines 6-20.
  - a. Explain how many direct current fast charging stations (DCFC) Walmart has in Kentucky.
  - b. Explain how KU providing such a rate could impact Walmart's investment in electric vehicle (EV) charging in Kentucky.
  - c. Explain whether Texas offers any incentives or rates for public EV charging.
  - d. Explain how other states that offer public EV rates handle rates for federally funded equipment.
  - e. Explain whether there is a concern that other classes would subsidize a public-facing EV charger rate.



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DATED **SEP 10 2025**

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