

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF JACKSON PURCHASE )  
ENERGY CORPORATION FOR ) CASE NO.  
ADJUSTMENTS IN EXISTING CABLE ) 2004-00319  
TELEVISION ATTACHMENT TARIFF )

FIRST DATA REQUEST OF COMMISSION STAFF  
TO JACKSON PURCHASE ENERGY CORPORATION

Jackson Purchase Energy Corporation ("Jackson Purchase"), pursuant to Administrative Regulation 807 KAR 5:001, is to file with the Commission the original and 8 copies of the following information, with a copy to all parties of record. The information requested herein is due January 28, 2005. Each copy of the data requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the person who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information herein has been previously provided, in the format requested herein, reference may be made to the specific location of said information in responding to this information request. When applicable, the information requested herein should be provided for total company operations and jurisdictional operations, separately.

1. Refer to the Application, Exhibit 2, Note 1.
  - a. Provide the amount and description of the non-pole material included in the pole accounts.
  - b. Explain in detail why Jackson Purchase used a multiplier of .95 instead of .85 as directed in the Commission's Order in Administrative Case No. 251,<sup>1</sup> page 9. Provide all supporting calculations and documentation.
  - c. Explain in detail why Jackson Purchase used a value per pole ground of \$33.08 instead of \$12.50 as directed in the Commission's Order in Administrative Case No. 251, page 9. Provide all supporting calculations and documentation.
2. Refer to the Application, Exhibit 7, Testimony of G. Kelly Nuckols, page 2, Item 3. Mr. Nuckols states that the field count of attachments for Charter Communications has been substantially completed but the September 30, 2004 count is believed to be correct.
  - a. Explain whether the count is expected to be completed and, if so, when it is to be completed. If the count is not to be completed, explain why it is not to be completed.
  - b. Explain whether Charter Communications has indicated that it agrees or disagrees with the count.

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<sup>1</sup> Administrative Case No. 251, Adoption of a Standard Methodology for Establishing Rates for CATV Pole Attachment.

3. Refer to the Application, Exhibit 8, Testimony of Richard Sherrill (“Sherrill Testimony”), page 3, second paragraph. Should the gross book value of the entire pole plant be as of year ended December 2004 or December 2003?

4. Refer to the Application, Sherrill Testimony, page 3, Item 7. The Commission’s Order in Administrative Case No. 251, page 10, states that the rate of return “should be equal to the return on investment (margin) allowed in the utility’s last rate case.” Explain in detail why Jackson Purchase did not use the rate of return authorized in its last rate case in its calculations.

5. Refer to the Application, Sherrill Exhibit 1.

- a. Provide the detail for CPR unit 364.009 – Rock Anchor.
- b. If items other than those contained in the detail for CPR unit 364.009 are included in the calculation for the embedded cost of anchors shown in Exhibit 2, provide a narrative explanation for the inclusion of the items in the calculation. With the explanation, include all calculations necessary to arrive at the \$4,003,244 plant value for anchors.

6. Is it Jackson Purchase’s understanding that the depreciation rates that resulted from the Commission’s Order in Case No. 2002-00485<sup>2</sup> were to be implemented for accounting purposes only?

- a. If no, is the depreciation expense used in calculating the proposed CATV rates based on the depreciation rates that were implemented in Case No. 2002-00485?

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<sup>2</sup> Case No. 2002-00485, Application of Jackson Purchase Energy Corporation for an Order Approving Revised Depreciation Rates.

b. If yes, provide Jackson Purchase's recalculated depreciation expense based on the most recent depreciation rates in effect prior to Case No. 2002-00485.



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Beth O'Donnell  
Executive Director  
Public Service Commission  
P. O. Box 615  
Frankfort, KY 40602

DATED January 14, 2005

cc: All Parties