## 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 ) SERVICE; (2) AN ORDER APPROVING ITS 2017 ) 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 )

CASE NO. 2017-00179

## COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION

Kentucky Cable Telecommunications Association ("KCTA"), pursuant to 807 KAR 5:001, is 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 October 27, 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.

KCTA 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 KCTA 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, KCTA 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 Patricia D. Kravtin ("Kravtin Testimony"), page 13, Table 1, which applied a 30 percent carrying charge in calculating pole attachment rates. Also refer to Kravtin Testimony, page 18, Table 3, which applied the 36.10 percent carrying charge that was calculated by Kentucky Power Company ("Kentucky Power") in determining its proposed pole attachment rate.

a. Provide the source of and calculation for the 30 percent carrying charge used in Table 1.

b. Explain why a 30 percent carrying charge was applied in Table 1,
but the 36.10 percent carrying charge was applied in Table 3.

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2. Refer to the Kravtin Testimony, page 17, Table 2. Provide the source and calculation for the Handy Whitman Index for Public Utility Pole Construction ("HWI") 23 percent rate of cost growth used in KCTA's analysis.

Explain whether the HWI index provides for the full allocation of the costs 3. of furnishing pole attachment services.

4. Refer to the Kravtin Testimony at page 18.

Provide a comparison of the impact on pole attachment revenues a. based upon the Kentucky Power proposal and the KCTA methodology.

b. Explain whether changes to the pole attachment rate methodology proposed by Dr. Kravtin will result in Kentucky Power's under-recovering its pole attachment costs.

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Gwen R. Pinson **Executive Director Public Service Commission** P.O. Box 615 Frankfort, KY 40602

OCT 1 2 2017 DATED

cc: Parties of Record

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