

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE	)	CASE NO.
PROPOSED POLE ATTACHMENT TARIFFS OF	)	2022-00105
INVESTOR OWNED ELECTRIC UTILITIES	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO LOUISVILLE GAS AND ELECTRIC COMPANY  
AND KENTUCKY UTILITIES COMPANY

Louisville Gas and Electric Company (LG&E) and Kentucky Utilities Company (KU) (collectively, LG&E/KU), pursuant to 807 KAR 5:001, are to file with the Commission an electronic version of the following information. The information requested is due on May 5, 2022. The Commission directs LG&E/KU 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.

LG&E/KU shall make timely amendment to any prior response if LG&E/KU obtain information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which LG&E/KU fail or refuse to furnish all or part of the requested information, LG&E/KU 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 applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, LG&E/KU 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 LG&E/KU's Combined Response to Kentucky Broadband and Cable Associations and AT&T Kentucky's Objections to Amended Pole Attachment Tariffs, pages 8–10 regarding the penalty for failing to correct violations in a timely manner.

- a. Describe the types of defects that LG&E/KU has typically seen since July 1, 2019, that did result or could have resulted, if not corrected in a timely manner, in a penalty pursuant Section 8.j. of the current Pole Attachment Rate Schedule.

b. Provide the average cost for the repairs and adjustments made by LG&E/KU pursuant to Section 8.j. of the current Pole Attachment Rate Schedule since July 1, 2019.

c. Explain whether the defects that LG&E/KU has typically seen since July 1, 2019, that could result in a penalty pursuant Section 9.j. of the proposed Pole Attachment Rate Schedule are generally systemic issues or involve an issue with a single pole.

d. Explain whether LG&E/KU has seen any change in the type or number of attachments that fail to comply with standards and terms set by the LG&E/KU since the 10 percent penalty was included in the tariff.

2. a. Identify each account and subaccount in which the costs of utility poles in service are recorded.

b. Provide a narrative description of the costs that are recorded in each such account, including a description of the type and vintage of poles for which costs are recorded in the account and a description other plant, if any, for which costs are recorded in the account.

c. Provide an Excel spreadsheet with all formulas, columns, and rows unprotected and fully accessible showing the plant in service balance of each such account at the end of each of the last five fiscal years.

3. a. Identify each account and subaccount in which accumulated depreciation for poles in service is recorded.

b. Provide a narrative description of how the accumulated depreciation in each such account is calculated.

c. Identify the corresponding plant account or accounts for each account in which accumulated depreciation for poles is recorded.

d. Provide an Excel spreadsheet with all formulas, columns, and rows unprotected and fully accessible showing the balance of each such account at the end of each of the last five fiscal years.

4. a. Identify the depreciation rates currently used to calculate depreciation expense for each account containing utility pole costs.

b. Identify the case in which each such depreciation rate was set.

c. Identify the useful lives of the poles used to calculate each such depreciation rate.

5. Identify the total number of distribution poles in LG&E and KU's systems, and provide a breakdown of those poles based on the year they were installed.

6. Identify the total number of transmission poles in LG&E and KU's systems, and provide a breakdown of those poles based on the year they were installed.

7. Describe in detail the current plan or policy regarding the inspection and replacement of aging or damaged poles in LG&E and KU's systems, and provide a copy of any such plan or policy that has been memorialized in writing.

8. State whether new attachers will be subsidizing other utility customers by paying the full cost to replace a utility pole that is not a red-tagged pole when the replacement pole has a longer useful life than the pole that is replaced, and explain each basis for the response.

9. Explain how it would affect capital planning and the ability to complete other necessary projects if LG&E/KU were required to cover the cost of every pole that had to

be replaced to accommodate a new attacher less the undepreciated value of the pole being replaced.

10. Describe in detail the issues with pole loading, if any, that arise from overlashing, including how wind and ice affect pole loading, and explain the technical bases for such issues.

11. Explain how the estimated pole survey cost of \$75 per pole (Wireline Attachments) and \$200 per pole (Wireless Attachments) were determined, and provide any documentation or analysis supporting the estimates.

12. Explain how the amounts of required performance assurance in Section 24 of LG&E/KU's tariffs were determined.

13. Provide support for the following penalties:
- a. \$25 for each unauthorized attachment within the communications space on a distribution pole;
  - b. \$50 for each unauthorized attachment made as part of a larger order within the communications space on a distribution pole;
  - c. \$500 for each unauthorized attachment above the communications space on a distribution pole; and
  - d. \$500 for each unauthorized attachment on a transmission pole or within a duct.



Linda C. Bridwell, PE  
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DATED APR 21 2022

cc: Parties of Record

Case No. 2022-00105

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