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 SECOND REQUEST FOR INFORMATION TO DUKE ENERGY KENTUCKY, INC.

Duke Energy Kentucky, Inc. (Duke Kentucky), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on June 2, 2022. The Commission directs Duke Kentucky to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ 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

¹ 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.

Duke Kentucky shall make timely amendment to any prior response if Duke Kentucky obtains 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 Duke Kentucky fails or refuses to furnish all or part of the requested information, Duke Kentucky 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, Duke Kentucky 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 Duke Kentucky's response to Staff's First Request for Information, Item 6 and Item 7. Provide the service lives of distribution poles used to determine the average service life, by type and vintage, to the degree they are broken down.
- 2. Other than identifying specific defective poles through inspections that require replacement, state whether Duke Kentucky has a policy or practice of replacing poles in a circuit on a periodic basis or as they reach the end of their useful lives and, if so, describe that policy or practice in detail, including how and when (e.g., how far in

advance) such replacements are identified or included in Duke Kentucky's projected capital spending budget.

- 3. Describe Duke Kentucky's recent efforts, if any, to reduce the number of above-ground transmission and distribution lines and identify the number of poles that have been eliminated in Duke Kentucky's system in each of the last ten years because the electric lines previously attached to those poles were placed underground.
- 4. Provide an estimate of the average cost to perform a make-ready pole replacement, and explain each basis for your response.
 - 5. Provide any current joint use agreements.

Linda C. Bridwell, PE Executive Director

Public Service Commission

P.O. Box 615

Frankfort, KY 40602

DATED MAY 19 2022

cc: Parties of Record

*Amy B Spiller Associate General Counsel Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201 *Duke Energy Kentucky, Inc. Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45202 *Rebecca C. Price Sturgill, Turner, Barker & Moloney 155 East Main Street Lexington, KENTUCKY 40507

*Honorable Allyson K Sturgeon Managing Senior Counsel - Regulatory & LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202 *Larisa Vaysman Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201 *Sara Judd Senior Corporate Attorney LG&E and KU Energy LLC 220 West Main Street Louisville, KENTUCKY 40202

*Hannah Wigger Sheppard Mullin Richter & Hampton LLP 2099 Pennsylvania Avenue NW, Suite 1 Washington, DISTRICT OF COLUMBIA 20006 *Michael Hornung Manager, Pricing/Tariffs Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40202

*Louisville Gas and Electric Company Louisville Gas and Electric Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

*James W Gardner Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street Suite 1400 Lexington, KENTUCKY 40507 *Minna Sunderman Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201 *Kentucky Utilities Company Kentucky Utilities Company 220 W. Main Street P. O. Box 32010 Louisville, KY 40232-2010

*John Tyler BellSouth Telecommunications, LLC dba AT&T 405 N Broadway Oklahoma City, OK 73102 *Paul Werner Sheppard Mullin Richter & Hampton LLP 2099 Pennsylvania Avenue NW, Suite 1 Washington, DISTRICT OF COLUMBIA 20006 *M. Todd Osterloh Sturgill, Turner, Barker & Moloney, PLLC 333 West Vine Street Suite 1400 Lexington, KENTUCKY 40507

*Kentucky Power Company Kentucky Power Company 1645 Winchester Avenue Ashland, KY 41101

*Honorable Robert J Patton Attorney at Law Kinner & Patton Law Offices 328 East Court Street Prestonsburg, KENTUCKY 41653

*Katie M Glass Stites & Harbison 421 West Main Street P. O. Box 634 Frankfort, KENTUCKY 40602-0634 *Rocco O D'Ascenzo Duke Energy Kentucky, Inc. 139 East Fourth Street Cincinnati, OH 45201