

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 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 May 5, 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 proposed tariff, KY P.S.C. Electric No. 2, Fifth Revised Sheet No. 92, page 1 of 10, Attachment Charges. Provide support for the new conduit occupancy fee of \$0.27 per linear foot.

2. Refer to Duke Kentucky's proposed tariff, KY P.S.C. Electric No. 2, Fifth Revised Sheet No. 92, page 2 of 10.

a. Explain why there is a provision in the tariff indicating that all fees, charges, and rentals not paid when due and payable shall bear interest at the maximum rate permitted by law instead of a late payment charge provision.

b. Explain how Duke Kentucky determines the interest rate to be charged for unpaid fees, charges, and rentals.

c. Explain whether the interest charged on unpaid fees, charges, and rentals is simple or compound interest.

d. Explain why 807 KAR 5:006, Section 9(3)(h), which states that a late payment charge may be assessed only once on a bill for rendered services, would not apply to the interest charge.

3. Refer to Duke Kentucky's proposed tariff, KY P.S.C. Electric No. 2, Fifth Revised Sheet No. 92, page 6 of 10, Terms and Conditions, No. 16. Regarding the attachee's responsibility to pay for unauthorized attachments, explain the reasoning for the change to make the attachee responsible for an amount equal to twice the rental that would have been due had the installation been in place for the past five years instead of had the installation been made the day after the Duke Kentucky's last inspection.

4. 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.

5. 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.

6. 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.

7. Identify the total number of distribution poles in Duke Kentucky's system, and provide a breakdown of those poles based on the year they were installed.

8. Identify the total number of transmission poles in Duke Kentucky's system, and provide a breakdown of those poles based on the year they were installed.

9. Describe in detail the current plan or policy regarding the inspection and replacement of aging or damaged poles in Duke Kentucky's system, and provide a copy of any such plan or policy that has been memorialized in writing.

10. 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.

11. Explain how it would affect capital planning and the ability to complete other necessary projects if Duke Kentucky 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.



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Public Service Commission
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DATED APR 21 2022

cc: Parties of Record

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