

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 KENTUCKY POWER COMPANY

Kentucky Power Company (Kentucky Power), 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 Kentucky Power 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.

Kentucky Power shall make timely amendment to any prior response if Kentucky Power 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 Kentucky Power fails or refuses to furnish all or part of the requested information, Kentucky Power 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, Kentucky Power 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 Kentucky Power's customer notice of tariff change, page 4, Section 15 – Attachment Inventory. Confirm that the existing practice regarding attachment inventories is not included in Kentucky Power's current tariff.

2. Refer to Kentucky Power's proposed tariff, P.S.C. KY No. 12, First Revised Sheet No. 16–2. Provide support for the following new charges:

- a. \$2.70 per linear foot per year for attachments within ducts or conduit;

b. \$150 per attachment per year for attachment of wireless facility to top of distribution pole; and

c. \$75 per attachment per year for attachment of wireless facility within communications space of distribution pole.

3. Refer to Kentucky Power's proposed tariff, P.S.C. KY No. 12, Original Sheet No. 16–8, Unauthorized Attachments. Provide support for the following penalties:

a. \$25 for each unauthorized attachment within the communications space on a distribution pole;

b. \$500 for each unauthorized attachment above the communications space on a distribution pole; and

c. \$500 for each unauthorized attachment within a duct.

4. Refer to Kentucky Power's proposed tariff, P.S.C. KY No. 12, First Revised Sheet No. 16–9, Performance Assurance.

a. Explain what the performance assurance is intended to secure, including specifically whether the performance assurance is intended to secure Kentucky Power against a loss arising from an occurrence that would be covered by a typical general liability insurance policy.

b. Explain whether there is a market for instruments that would offer such performance assurance.

c. Explain how the amounts for performance assurance were determined.

5. Refer to Kentucky Power's proposed tariff, KY P.S.C. No. 12, Original Sheet No. 16–11, Payment. Also refer to Kentucky Power's current tariff, KY P.S.C. No. 12, Original Sheet No. 16–1, Delayed Payment Charge.

a. Regarding payments not made on time, explain the reasoning for moving from a 5 percent late payment charge to monthly simple interest at 1.5 percent.

b. 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.

6. a. Explain how Kentucky Power estimated the cost of \$275 per pole for make-ready surveys, and provide any documentation or analysis supporting the estimate.

a. Explain why the prepayment of make-ready survey costs is discretion, and identify those standards Kentucky Power anticipates applying to determine when and whether to require the prepayment of survey costs.

b. Explain how the discretionary prepayment of make-ready survey costs will be applied in a

7. 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 a spreadsheet showing the plant in service balance of each such account at the end of each of the last five fiscal years.

8.
 - 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 a spreadsheet showing the balance of each such account at the end of each of the last five fiscal years.
9.
 - 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.
10. Identify the total number of distribution poles in Kentucky Power's system, and provide a breakdown of those poles based on the year they were installed.
11. Identify the total number of transmission poles in Kentucky Power's system, and provide a breakdown of those poles based on the year they were installed.
12. Describe in detail the current plan or policy regarding the inspection and replacement of aging or damaged poles in Kentucky Power's system, and provide a copy of any such plan or policy that has been memorialized in writing.
13. 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.

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

15. Describe in detail the issues with pole loading that could arise from overloading, including how wind and ice could affect pole loading, and explain the technical bases for such issues.



Linda C. Bridwell, PE
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED APR 21 2022

cc: Parties of Record

*Amy B Spiller
Associate General Counsel
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Larisa Vaysman
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

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

*Honorable Allyson K Sturgeon
Managing Senior Counsel - Regulatory &
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202

*Michael Hornung
Manager, Pricing/Tariffs
Louisville Gas and Electric Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

*Kentucky Utilities Company
Kentucky Utilities 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

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*John Tyler
BellSouth Telecommunications, LLC dba AT&T
405 N Broadway
Oklahoma City, OK 73102

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

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

*Rocco O D'Ascenzo
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45201

*Katie M Glass
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Rebecca C. Price
Sturgill, Turner, Barker & Moloney
155 East Main Street
Lexington, KENTUCKY 40507

*Duke Energy Kentucky, Inc.
Duke Energy Kentucky, Inc.
139 East Fourth Street
Cincinnati, OH 45202

*Sara Judd
Senior Corporate Attorney
LG&E and KU Energy LLC
220 West Main Street
Louisville, KENTUCKY 40202