

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 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, 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 LG&E/KU 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.

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 to LG&E/KU's response to Commission Staff's First Request for Information (Staff's First Request), Item 11, regarding the estimated pole survey costs. Provide a detailed breakdown of the costs of \$235,816.75 and \$450,654.50.

2. Refer to LG&E/KU's response to Staff's First Request, Item 4. 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.

3. Refer to LG&E/KU's response to Staff's First Request, Item 7. Other than identifying specific defective poles through inspections that require replacement, state whether LG&E/KU 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 such replacements are identified or included in LG&E/KU's projected capital spending budget.

4. Refer to LG&E/KU's response to Staff's First Request, Item 13(c) and (d), regarding the penalty for unauthorized attachments above the communications space on a distribution pole and unauthorized attachments on a transmission pole or within a duct. As the Federal Communications Commission (FCC) has stated that it considers a penalty for unauthorized attachments to be presumptively reasonable if the penalty does not exceed five times the current annual rental fee per pole if the pole occupant does not have a permit and the violation is self-reported or discovered through a joint inspection, with an additional sanction of \$100 per pole if the violation is found by the pole owner in an inspection in which the pole occupant declined to participate,² explain how the \$500 penalty is reasonable given that it appears to exceed the amounts the FCC would find presumptively reasonable.

² See, *In the Matter of Implementation of Section 224 of the Act A National Broadband Plan for Our Future*, 26 F.C.C. Rcd. 5240, 5291 (2011), rule modification granted by *In the Matter of Implementation of Section 224 of the Act*, 30 F.C.C. Rcd. 13731 (2015).

5. Describe LG&E/KU'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 LG&E/KU's system in each of the last ten years because the electric lines previously attached to those poles were placed underground.

6. Provide an estimate of the average cost to perform a make-ready pole replacement, and explain each basis for your response.

7. Provide any current joint use agreements.



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DATED MAY 19 2022

cc: Parties of Record

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