

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO AT&T KENTUCKY

AT&T Kentucky (AT&T), 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 July 7, 2022. The Commission directs AT&T 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.

AT&T shall make timely amendment to any prior response if AT&T 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 AT&T fails or refuses to furnish all or part of the requested information, AT&T 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, AT&T 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 the Testimony of Daniel Rhinehart (Rhinehart Testimony), pages 4–5, and 8–9, regarding the tagging requirement.

a. Explain in detail why AT&T contends that the 180-day period for tagging attachment is not practical.

b. Assuming AT&T's approach was adopted and attachers had to tag untagged facilities any time they visit an untagged location to perform maintenance or other work (and assuming the requirement was applicable to AT&T), state how long AT&T estimates it would take to tag all of its facilities attached to Kentucky Power Company's

(Kentucky Power) poles; and state how long AT&T estimates it would take to tag all of its facilities attached to Louisville Gas and Electric (LG&E) and Kentucky Utilities' (KU) poles i.e. how long would take before AT&T visited every location to perform maintenance or other work on each system.

c. If there is no hard date for completing tagging, explain how the requirement could ever be enforced.

d. Identify approximately how many attachments AT&T has to Kentucky Power's poles.

e. Identify approximately how many attachments AT&T has to LG&E and KU's poles.

2. Refer to the Rhinehart Testimony, pages 8–9, regarding AT&T's recommendation that, in order to address AT&T's concern regarding the definition of attachment contained in the tariffs, the Commission should require that tariff rate terms be modified to be assessed on an occupied usable space basis and that a Commission Order should expressly state that while attachments may be more broadly defined for other applicable tariff terms, the rental component should be based on the average amount of usable space encumbered on the electric utility's pole. Explain whether there are any other ways in which the Commission could address AT&T's concerns regarding the definition of attachment. If so, identify and explain them.

3. Refer to the Rhinehart Testimony, pages 17–18, in which AT&T states that the term foreign-owned pole should be defined. Provide a definition of foreign-owned pole that would be acceptable to AT&T, and explain the basis of your response.



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DATED JUN 23 2022

cc: Parties of Record

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