

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 THIRD 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 July 7, 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 response to Commission Staff's Second Request for Information (Staff's Second Request), Item 1, regarding the calculation of the rate for attachments within ducts or conduit. Explain why Kentucky Power chose to use the net methodology instead of the gross methodology given the fact the two result in different rates, with the gross methodology being less than the net methodology.

2. Refer to Kentucky Power's response to Staff's Second Request, Item 7(a), Attachment 1.

a. Explain how the low and high amounts for each component were derived and include any supporting calculations.

b. For the Field Data Collection/pole, OK to attach/pole, rearrangement/pole, work order remedy/pole and post construction inspection/pole, explain whether the amounts listed represent the cost per pole if only one pole were being surveyed. If so, explain why it would not be more appropriate to estimate the cost based on 50 poles being surveyed at the same time to achieve economies of scale. Also, if so, provide a revised calculation based on 50 poles being surveyed at the same time.

c. For the past two calendar years and 2022 to date, provide the number of applications that were OK to attach, the number that required rearrangement, and the number that required a work order remedy. If the specific number cannot be provided, provide an estimate and explain how Kentucky Power arrived at the estimate.

3. Refer to Kentucky Power's response to Staff's Second Request, Item 7(b), in which Kentucky Power states that it is possible for a single application to carry a cost higher than \$275 per pole if it disproportionately includes poles that require work beyond rearrangement, most applications will carry a lower cost than \$275 per pole.

a. For the past two calendar years and 2022 to date, provide how many applications disproportionately included poles that require work beyond rearrangement. If a specific number cannot be provided, provide an estimate and explain how Kentucky Power arrived at the estimate.

b. If most applications will carry a lower cost than \$275 per pole, explain how it is reasonable for Kentucky Power to require attachers to prepay in the amount of \$275 per pole.

4. Refer to Kentucky Power's proposed tariff, P.S.C. KY. NO. 12, 1st Revised Sheet No. 16-3, which states in part "If the actual cost of performing the make-ready survey exceeds the amount of Operator's prepayment, then Operator shall reimburse Company for any difference upon receipt of an invoice for such amount." Explain whether Kentucky Power would refund the difference if the make-ready costs were less than the amount of the Operator's prepayment. If so, identify the section of the tariff stating that. If not, explain why not.



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

DATED JUN 23 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