

Andy Beshear
Governor

Rebecca W. Goodman
Secretary
Energy and Environment Cabinet



Commonwealth of Kentucky
Public Service Commission
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Angie Hatton
Chair

Mary Pat Regan
Commissioner

Andrew W. Wood
Commissioner

March 30, 2026

PARTIES OF RECORD

Re: Case No. 2023-00416

Notice is given to all parties that the attached September 2025 Third Quarter Report on Pole Attachments has been filed into the record of this proceeding.

If you have any comments you would like to make regarding the contents of the document, please do so within five days of receipt of this letter. If you have any questions, please contact Ellen Fouser-Gormley, Staff Attorney III, at Ellen.FouserGormley@ky.gov.

Sincerely,

A handwritten signature in blue ink that reads "Linda C. Bridwell".

Linda C. Bridwell, PE
Executive Director

Attachment

Andy Beshear
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September 30, 2025

MEMORANDUM

TO: Robert Stivers, Senate President
David W. Osborne, Speaker of the House

FROM: Linda C. Bridwell, PE
Executive Director, Kentucky Public Service Commission

DATE: September 30, 2025

RE: September 2025 Report on Pole Attachments for Broadband Service

Attached please find the fifth quarterly report from the Kentucky Public Service Commission (PSC) regarding the progress made in expediting utility pole attachment requests for broadband service. As you know, Senate Joint Resolution 175, (SJR 175) passed during the 2024 Regular Session of the Kentucky General Assembly, and enacted on April 4, 2024, directed the PSC to promulgate emergency amendments to its pole attachment regulations to, among other things, expedite the processing of broadband requests for pole attachments and reduce the backlog of pole attachment requests. SJR 175 also directed the PSC to prepare and submit a quarterly report to the Legislative Research Commission for referral to the Interim Joint Committee on Natural Resources and Energy, beginning September 30, 2024. This report is submitted as the fifth quarterly report in fulfillment of the legislative mandate.

Please do not hesitate to call me if you have any questions.

**Report on the Progress Made in Expediting Pole Attachment Requests for
Broadband Service
in Kentucky**

**A Report to the
Legislative Research Commission
for Referral to
the Interim Joint Committee on
Natural Resources and Energy
Pursuant to 2024 SJR 175**

by the

Kentucky Public Service Commission

September 30, 2025

Executive Summary

2024 SJR 175, a joint resolution “facilitating the deployment of broadband internet service to unserved and underserved citizens in the Commonwealth and declaring an emergency,” recognized the importance of broadband internet access to broadband internet service and that lack of internet access in rural areas places unserved or underserved citizens at a disadvantage. SJR 175 noted that broadband providers have and will receive significant monies to fund broadband deployment in the Commonwealth and found that the PSC should make every effort to remove unnecessary delays in how broadband attachment requests are received and processed by pole-owning utilities.

SJR 175 directed the PSC to promulgate emergency amendments to its pole attachment regulations to, among other things, expedite the processing of broadband requests for pole attachments, reduce the backlog of pole attachment requests and establish parameters to expedite the processing of pole attachment requests for unserved and underserved areas. SJR 175 directed the PSC to establish a docket on pole attachment issues to receive comments from affected parties and find resolutions that will expedite pole attachment requests and broadband deployment. Finally, SJR 175 directed the PSC to prepare and submit a quarterly report to the Legislative Research Commission for referral to the Interim Joint Committee on Natural Resources and Energy, beginning September 30, 2024. This report is submitted as the fifth quarterly report in fulfillment of the legislative mandate.

Background

Pursuant to KRS Chapters 74, 278, 279, and parts of 61, the PSC is obligated to ensure that rates for electric, gas, water, sewer, and telecommunications services are fair, just and reasonable. In addition to its regulation of utility rates, the PSC is also responsible for ensuring that utility services are adequate, efficient and reasonable. The nearly 1,100 utilities under the PSC jurisdiction include investor-owned and cooperative electric companies, natural gas distributors and pipeline companies, water and sewer providers including districts, associations and investor-owned utilities, and cooperative telephone companies. The PSC does not regulate the rates and service of utilities subject to the control of cities or rural electric cooperatives served by the Tennessee Valley Authority (TVA).

The United States Congress, on February 21, 1978, by Public Law 95-234, 92 Stat. 33, 47 U.S.C. § 224, amended the Federal Communications Act to grant regulatory jurisdiction over cable television (CATV) pole attachments to the Federal Communications Commission (FCC) in those states which did not exercise such regulation. The new law exempted cooperative-formed electric and telephone utilities from the FCC's pole attachment jurisdiction. Congress, however, allowed states to "reverse preempt" the FCC and assert state jurisdiction over CATV attachments to utility poles.

Several Kentucky utilities requested that the PSC exercise "reverse preemption" and, in August 1981, the PSC issued an order asserting jurisdiction over CATV attachments and reverse preempted the FCC. See, PSC Case No. 8040, *The Regulation of Rates, Terms and Conditions for the Provision of Pole Attachment Space to Cable Television Systems by Telephone Companies* (Ky. PSC Aug. 26, 1981). Unlike the FCC's jurisdiction, the PSC's jurisdiction over CATV attachments extended to electric and telephone cooperatives. Kentucky is currently one of 24 states and the District of Columbia that exercise jurisdiction over pole attachments.

The Kentucky Court of Appeals denied a jurisdictional challenge from several CATV providers finding that the PSC had, "jurisdiction over the utility companies, and that jurisdiction extends to their poles and the "services" and "rates" generated by pole attachment agreements." *Kentucky CATV Ass'n v. Volz*, 675 S.W.2d 393, 396 (Ky. App. 1983).

The PSC also adopted a methodology for calculating pole attachment rates. See, *The Adoption of a Standard Methodology for Establishing Rates for CATV Pole Attachments*, (Ky. PSC Sept. 17, 1982). The PSC required pole-owning utilities to file pole attachment tariffs setting out the rates and conditions of service for CATV attachments.

From the early eighties until the late 2010s, the PSC handled issued relating to pole attachments, including non-CATV attachments, on an *ad hoc* basis. The PSC would address these issues through Staff Opinions or Orders as required by the nature of each case. However, as broadband deployment increased, and to a lesser extent requests to

attach small cell antennas, it became apparent that a comprehensive regulation was necessary to address the increasing importance of third-party pole attachments.

The PSC, thus, in late 2019, completed a draft of a new regulation designed to comprehensively address pole attachments to the poles of jurisdictional utilities. In February of 2020 the PSC sent the proposed regulation to interested parties and held several meetings in February and March 2020 with the intent of promulgating the regulation by May 2020. The PSC had to postpone several meetings and the filing of the regulation due to COVID-19 but in December of 2020 the PSC restarted the meetings relating to the proposed pole attachment regulation.

The PSC, therefore, was well situated to promulgate a pole attachment regulation when, during the 2021 Regular Session, the General Assembly, on March 30, 2021, enacted House Bill 320, 2021 Ky. Acts ch. 171, sec. 1, which required, among other things, that the PSC, by December 31, 2021, promulgate regulations regarding pole attachments, including those necessary for the provisions of broadband service.

The PSC filed the new broadband regulation (codified as 807 KAR 5:015) with the Legislative Research Commission on May 14, 2021, more than seven months before the deadline established by the General Assembly. 807 KAR 5:015 became effective in late January 2022 and pole owning utilities filed conforming tariffs on or before February 28, 2022. The Kentucky Broadband and Cable Association (KBCA) filed objections to each filed tariff. Due to KBCA's complaints, and pursuant to KRS 278.190, the PSC suspended the utilities' proposed pole attachment tariffs to conduct further investigation of the tariffs. On December 22, 2022, the PSC issued Orders approving, with modifications, the utilities' various tariffs.

The PSC, after promulgating 807 KAR 5:015 and approving pole attachment tariffs, received no complaints from utilities or attachers regarding problems with the implementation of the new pole attachment regime. The PSC first became aware that attachers had issues with how pole attachments were being processed when members of KBCA raised these concerns at the December 11, 2023, meeting of the Investments in Information Technology Improvement & Modernization Projects Oversight Board.

In response to these newly discovered concerns the PSC, on December 14, 2023, initiated a case to "create a stakeholder process to discuss and investigate issues and lessons learned relating to pole attachments." The purpose of the case was, "to identify issues regarding pole attachments, particularly regarding the extension of broadband services that might be addressed through changes in the regulations, rules, or tariffs governing pole attachments." See Case No. 2023-00416, *Electronic Investigation of Pole Attachments*, (Order issued Dec. 14, 2023). The PSC convened a series of conferences between stakeholders to determine what changes, if any, were necessary to address issues arising from requests for pole attachments.

This background information is intended only to outline the efforts the PSC has taken to regulate pole attachments prior to the enactment of SJR 175.

Efforts to Expedite Broadband Deployment

The Commission, on February 25, 2025, filed with the Legislative Research Commission emergency amendments to 807 KAR 5:015 and also filed ordinary amendments to 807 KAR 5:015. The public comment hearing for the emergency amendments was held on April 29, 2025 and the public comment hearing for the ordinary amendments was held on May 29, 2025. The Commission did not amend the emergency amendments or the amendments to the ordinary regulation. Both the emergency amendments and the ordinary amendments passed through the Administrative Regulation Review Subcommittee and have been referred to the subject matter committee.

The PSC, in the open docket Case No.2023-00416, in addition to already hosting eight stakeholder conferences in 2024 to resolve issues pertaining to pole attachments, has established recurring filing requirements for pole owners and attachers. The Commission now requires quarterly updates on backlogs of pole attachment applications, as well as statistical information from all pole owners, except for rural local exchange carriers, relating to the number and time of processing of pole attachment applications. This information will assist the PSC in determining where significant bottlenecks occur in the pole attachment process, inform the PSC and stakeholders what changes would be necessary to address the bottlenecks, and help provide the Commission and General Assembly a clearer view of the state of broadband pole attachments in Kentucky. Attached to this report are the most recent updates on backlogs on pole attachments filed with the Commission in mid-September 2025.

Since the implementation of the pole attachment regulation, 807 KAR 5:015, in March 2022, no attacher has filed a complaint against a utility.

The PSC, by the time the next report is filed, will have received from pole owners their tariffs that comply with the amendments. The Commission will review the tariffs and may suspend and investigate the tariffs if objections or complaints are received.

POLES CURRENTLY IN EACH PHASE OF PROCESS (as of Sept. 5, 2025)						
STATUS	RESPONSIBLE	TOTAL POLES	POLES ON TIME	POLES LATE	% POLES ON TIME	% POLES LATE
FIELD SURVEY and ENGINEERING (30 days)	KU	4,894	4,887	7	99.9%	0.1%
MAKE READY ESTIMATE (14 days)	KU	47	33	14	70.2%	29.8%
MAKE READY PAYMENT (14 days)	CHARTER	2,560	1,231	1,329	48.1%	51.9%
MAKE READY CONSTRUCTION (no timeline)	KU	5,438	N/A	N/A	N/A	N/A
AWAITING FOREIGN-OWNED POLE REPLACEMENT		680	N/A	N/A	N/A	N/A
COMMS MAKE READY / INSTALLATION (60 days)	CHARTER	14,517	4,817	9,700	33.2%	66.8%
POST-CONSTRUCTION INSPECTION (60 days)	KU	3,635	1,911	1,724	52.6%	47.4%
INSTALLATION DEFECT DETECTED	CHARTER	705	178	527	25.2%	74.8%
COMPLETE	N/A	460	N/A	N/A	N/A	N/A
TRANSMISSION (no timeline)	KU	0	N/A	N/A	N/A	N/A
CANCELED	N/A	2,152	N/A	N/A	N/A	N/A
TOTAL		35,088		12,774		

CUMULATIVE POLES PROCESSED SINCE MARCH 1, 2024 (as of Sept. 5, 2025)						
STATUS	RESPONSIBLE	TOTAL POLES	POLES ON TIME	POLES LATE	% POLES ON TIME	% POLES LATE
FIELD SURVEY and ENGINEERING (30 days)	KU	30,615*	29,602	1,013	96.7%	3.4%
MAKE READY ESTIMATE (14 days)	KU	29,059	23,421	5,638	80.6%	19.4%
MAKE READY PAYMENT (14 days)	CHARTER	29,045	6,818	22,227	23.5%	76.5%
MAKE READY CONSTRUCTION (no timeline)	KU	22,812	N/A	N/A	N/A	N/A
COMMS MAKE READY / INSTALLATION (60 days)	CHARTER	19,375	6,635	12,740	34.2%	65.8%
POST-CONSTRUCTION INSPECTION (60 days)	KU	4,858	2,837	2,021	58.4%	41.6%
INSTALLATION DEFECT DETECTED	CHARTER	2,117	845	1,272	39.9%	60.1%
COMPLETE	N/A	460	N/A	N/A	N/A	N/A
TRANSMISSION (no timeline)	KU	2,379	N/A	N/A	N/A	N/A
CANCELED	N/A	2,152	N/A	N/A	N/A	N/A

*35,146 Poles have been submitted in the high volume plan. This total excludes canceled applications and applications containing Transmission poles.



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Larisa M. Vaysman
Associate General Counsel

VIA ELECTRONIC FILING

September 15, 2025

Ms. Linda C. Bridwell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

Re: Case No. 2023-00416
In the Matter of: Electronic Investigation of Pole Attachments

Dear Ms. Bridwell:

In its May 27, 2025 Order in the above captioned case, the Commission found “updates to the ‘backlog’ should be filed with the Commission,” with term “backlog” referring to “pending applications that have frequently been referred to in this proceeding as the ‘backlog.’”¹

Duke Energy Kentucky, Inc. (Duke Energy Kentucky or the Company) has not been involved in the previous conversations regarding “backlog” in this proceeding nor has it been requested to submit prior pole attachment updates and does not believe that it is a party to the “backlog.” For example, a May 2, 2024 pole attachment update by the Kentucky Broadband and Cable Association noted that “Duke” is not included due to being a “Low volume entit[y].”² While other subsequent updates make no mention of the Company at all.³ Thus, it does not seem that the “backlog” reporting requirement was intended to apply to Duke Energy Kentucky.

However, until the matter of the applicability of this reporting requirement to Duke Energy Kentucky is clarified, the Company submits the below backlog update as of September 15, 2025, providing the information requested by the Commission.⁴

¹ Order, p. 1 (May 27, 2025).

² Charter Communications Kentucky Pole Attachment Application Data, Exhibit 1 (“Low volume entities not shown. (AT&T, Cincinnati Bell/Alta Fiber, Duke, Grayson, Jackson, Kenergy, KY Power, Meade, South KY, Taylor County, Windstream)”) (May 2, 2024).

³ See, e.g., Supplemental Information (Dec. 11, 2024).

⁴ Order, p. 1 (“[W]hether the application is waiting on actions from the pole owner or the attacher, what that action is, and the number of attachments not timely addressed under the timelines provided for in 807 KAR 5:015”) (May 27, 2025).

Additionally, in its May 27, 2025, Order, the Commission found:

[P]ole owners, excluding rural local exchange carriers, should be required to file quarterly reports, beginning September 15, 2025, and continuing until further Order of the Commission. The information in these updates should include: the number of pole-attachment requests received; processing time for the request; whether make-ready is required; the time to complete make-ready; and the number of attachment requests competed in the quarter.⁵

Accordingly, Duke Energy Kentucky submits below this additional quarterly report as of September 9, 2025, providing the information requested by the Commission.

Quarterly Backlog Report

As of September 15, 2025, there are 653 pending applications to make attachments to 6,508 Duke Energy Kentucky poles, of which 5,792 poles have been approved.⁶

For pending applications where the attachments have not yet been attached to the pole, there appear to be a total of 174 poles waiting on action by the Company and 2,981 poles waiting on action by the attacher:

- **712** poles are in **Proposal** status, waiting on the attacher to complete and submit the application;
- **4** poles are in **Reply** status, waiting on the Company to respond;
- **229** poles are in **Acknowledgment** status, waiting on the attacher to acknowledge the approved or denied permit in the system;
- **170** poles are in **DEK Construction** status, waiting on the Company to notify the attacher that make-ready is complete; and,
- **2040** poles are in **Attacher Construction** status, waiting on the attacher to notify the Company that their construction is completed so a post inspection can take place to verify the route was built as designed.

After the completion of the **DEK Construction** and **Attacher Construction** statuses, the attachment is attached to the pole. During the remaining stages below, the application remains pending in the Company's system, but telecommunications customers should already be benefiting from the attachment.

⁵ Order, p. 2 (May 27, 2025).

⁶ The data in this letter does not include banners.

- **423** poles are in **DEK Post Inspection** status, waiting on the Company to notify the attacher that it has completed inspection and verified the route was built in accordance with engineering;
- **9** poles are in **Attacher Conclusion** status, waiting on the attacher to close the completed permit application; and,
- **2921** poles are in **DEK Conclusion** status, waiting on the Company to invoice the attacher or close the completed permit application.

According to the Company's system, a total of 3 poles, associated with a single application submitted in 2019, appear to fall out of the timelines provided in 807 KAR 5:015.

Quarterly Report

In the previous quarter (beginning June 16, 2025), Duke Energy Kentucky received two pole-attachment requests, as of September 9, 2025:

- The first request was submitted on July 1, 2025, and approved on July 3, 2025, without make-ready; and
- The second request was submitted on September 5, 2025, and is currently in the engineering phase which will determine whether make-ready will be required.

The total number of pole-attachment requests completed during the previous quarter was one.

I certify that the electronically filed document is a true and accurate copy of the original document and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of this filing will be made.

Respectfully submitted,

/s/Larisa M. Vaysman

Larisa M. Vaysman (98944)

Associate General Counsel

Duke Energy Business Services LLC

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Counsel for Duke Energy Kentucky, Inc.

VERIFICATION

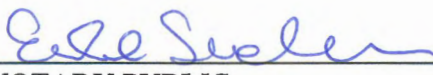
STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

The undersigned, Jeremy B. Gibson, Manager Joint Use, being duly sworn, deposes and says that he has personal knowledge of the matters set forth in the foregoing quarterly report, and that the information contained therein is true and correct to the best of his knowledge, information, and belief.



Jeremy B. Gibson, Affiant

Subscribed and sworn to before me by Jeremy B. Gibson on this 15th day of September, 2025.



NOTARY PUBLIC

My Commission Expires: July 8, 2027



EMILIE SUNDERMAN
Notary Public
State of Ohio
My Comm. Expires
July 8, 2027



September 15, 2025

Via Electronic Filing System

Linda C. Bridwell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602

RE: *In the Matter of Electronic Investigation of Pole Attachments, Case No. 2023-00416*

Dear Executive Director Bridwell:

Attached please find Kentucky Electric Cooperatives' (the "Cooperatives")¹ quarterly pole attachment updates filed pursuant to the Kentucky Public Service Commission's (the "Commission") May 27, 2025 order in the above-referenced case (the "Order").

In compliance with the Order and ordering paragraph 1 thereof, **Exhibit 1** provides an update of the Cooperatives' pole attachment data as of or about August 31, 2025 (the "Ordering Paragraph 1 Report").² As with the prior report, this report does not include requests to overlash given that they are subject to a different review process than other attachments under 807 KAR 5:015 and have not been part of the "backlog" in this proceeding.

¹ The following electric cooperatives are jurisdictional utilities that were made party to this case by Order: Big Rivers Electric Corporation; Big Sandy RECC; Blue Grass Energy Cooperative Corporation; Clark Energy Cooperative, Inc.; Cumberland Valley Electric, Inc.; East Kentucky Power Cooperative, Inc.; Farmers RECC; Fleming-Mason Energy Cooperative; Grayson RECC; Inter-County Energy Cooperative Corporation; Jackson Energy Cooperative Corporation; Jackson Purchase Energy Corporation; Kenegy Corporation; Licking Valley RECC; Meade County RECC; Nolin RECC; Owen Electric Cooperative; Salt River Electric Cooperative Corporation; Shelby Energy Cooperative, Inc.; South Kentucky RECC; and Taylor County RECC. Although this filing speaks on behalf of the group's common interests, each cooperative reserves the right to also address issues on an individual basis throughout this proceeding.

² Exhibit 1 includes data from Blue Grass Energy Cooperative Corporation, Clark Energy Cooperative, Inc., Fleming-Mason Energy Cooperative, Inter-County Energy Cooperative Corporation, Owen Electric Cooperative, Salt River Electric Cooperative Corporation, Shelby Energy Cooperative, Inc., South Kentucky RECC, and Taylor County RECC – the Cooperatives that have been reporting on the "backlog" with Charter. The remaining Cooperatives, specifically, Big Rivers Electric Corporation, Big Sandy RECC, Cumberland Valley Electric, Inc., East Kentucky Power Cooperative, Inc., Farmers RECC, Grayson RECC, Jackson Energy Cooperative Corporation, Jackson Purchase Energy Corporation, Kenegy Corporation, Licking Valley RECC, Meade County RECC, and Nolin RECC do not have a pole attachment "backlog" with Charter.

In compliance with ordering paragraph 2 of the Order, **Exhibit 2** provides an update on the number of pole attachment requests received and completed during the quarter ending on or about August 31, 2025 (the “Ordering Paragraph 2 Report”).³

The Ordering Paragraph 1 Report (Exhibit 1) cumulatively reflects that:

- There are 27,169 poles currently in the survey stage.
- The Cooperatives have approved permits to attach to 64,337 poles.
- There are 32,816 poles that are currently ready for attachment, 11,487 of which have been awaiting attachment for over 180 days.
- There are 0 poles listed in “survey overdue” status.⁴
- The “make-ready overdue” poles for Clark Energy are the result of significant reconductoring required to accommodate Charter’s attachments. This is beyond the type of make-ready contemplated by the pole attachment regulation and requires additional engineering which has delayed make-ready construction.
- The high number of cancelled permit applications for Owen Electric are the result of Charter converting submitted pole attachment applications to overlash requests.

The Ordering Paragraph 2 Report (Exhibit 2) cumulatively reflects that:⁵

- The Cooperatives routinely complete make-ready by or before the regulatory deadline.
- For many of the Cooperatives, 80% or more of requests to attach require make-ready.

In addition, the Cooperatives generally complete their tasks (initial review, surveys, and make-ready) in the pole attachment process within the regulatory timeframes absent extenuating circumstances.

³ Exhibit 2 includes data from all of the Cooperatives with the exception of East Kentucky Power Cooperative, Inc. which is filing separately.

⁴ The Alden One software used by most of the Cooperatives to process pole attachment requests shows more than 0 poles in the “survey overdue” category. However, the “survey overdue” status in Alden One is based on the Commission’s timeline requirements for standard orders. The system does not account for: (i) regulatory provisions that extend timelines for larger orders; (ii) requests submitted within 30 days of each other that may therefore be treated as a single application; or (iii) the 90-day advance notice required for larger orders. Making the adjustments for these regulatory requirements, the actual number of poles in “survey overdue” status is 0.

⁵ Requests completed may exceed requests received during the quarter as a result of the Cooperatives completing requests that were received prior to the start of the quarter.

As is evidenced by these quarterly reports, the Cooperatives are continuing to process pole attachment requests within the timeframes established under 807 KAR 5:015, despite the increasing number of pole attachment requests.

Sincerely yours,

DINSMORE & SHOHL LLP

/s/ Edward T. Depp

Edward T. Depp

Attachment

Certification

I hereby certify that a copy of this filing has been served electronically on all parties of record through the use of the Commission's electronic filing system, and there are currently no parties that the Commission has excused from participation by electronic means. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, a paper copy of this filing has not been transmitted to the Commission.

/s/ Edward T. Depp

Counsel to Kentucky Electric Cooperatives

Exhibit 1

		Status	Blue Grass Energy	Clark Energy	Fleming-Mason Energy	Inter-County Energy	Owen Electric	Salt River	Shelby	South Kentucky RECC	Taylor County RECC	Grand Total	
Pre-Draft	Attacher	Created		12	281	150	5					448	
		Revise Application		26	17	54	443	564					1,104
Review for Completeness		Application Review			40							40	
Survey	Pole Owner	Survey	5,991	1,315	5,984	3,763	3	1,453	98	3,797	2,247	24,651	
		Survey Overdue											-
Make Ready Estimate	Both Parties	Survey Review	307	501	184	286	29			794	417	2,518	
	Pole Owner	Estimate Make-Ready Costs			41	30		610		1,748		2,429	
	Attacher	Awaiting Customer Response	425		94	325		222					1,066
		Customer Response Overdue		152	96	1,012		28					1,288
		Awaiting Make-Ready Payment	359	131	172		115	614				44	1,435
Make-Ready Payment Overdue					23							23	
Construction	Pole Owner	Make-Ready Construction Pending	1,290	549		85		272		535		2,731	
		Make-Ready	765	227	172	100	114	177	3,080	422	51	5,108	
		Make-Ready Overdue		137	9								146
	Attacher	Ready To Attach	5,250	1,317	1,922	898	263	1,623	8,135	927		5	20,340
Attachment Extension Approved			191	164	292	342						989	
Post Inspection	Pole Owner	Attachment Overdue	6,522	1,287	1,171	1,977	517					13	11,487
		Post Inspection	5,611	962	7,522	4,123	2,251	1,591	3,330	165		8	25,563
		Corrections Needed	420		592	554	75						1,641
True Up	Pole Owner	True-Up Billing	6	3	5	20		336				370	
No Action Needed		Cancel	726	331	315	114	2,329	75		281		4,171	
		Complete	78	24	35	24	9	3,777					3,947
Grand Total			27,750	7,165	18,816	13,830	6,523	11,314	14,643	8,669	2,785	111,495	

Exhibit 2

Cooperative	Applications Received	Applications Completed	MR Required?	Average days in Construction
Big Rivers	0	0	-	-
Big Sandy	0	0	-	-
Blue Grass	58	77	83.54%	29
Clark Energy	25	34	73.58%	92
Cumberland Valley	2	0	-	-
Fleming-Mason Energy	68	53	89.09%	39
Farmers	0	0	-	-
Grayson	1	1	100.00%	2
Inter-County	43	29	93.75%	52
Jackson	22	19		60-90
Jackson Purchase	4	3	0.00%	
Kenergy	1	1	0.00%	-
Licking Valley	2	2	0.00%	-
Meade County	1	10	96.00%	39
Nolin	10	9	0.00%	-
Owen	1	4	93.75%	67
Salt River	70	34	88.00%	82
Shelby	1	5	100.00%	All within regs.
South Kentucky	45	28	93.75%	All within regs.
Taylor County	26	0	92.86%	-

Since January 1, 2024, excluding submissions by Kentucky Power’s ILEC joint use partners, third parties have submitted proposals (i.e., applications) for 913 poles. Those 913 poles fall collectively into the following statuses:

Status	Number of Poles
Initiated	36
Pending	788
Approved	21
Construction	0
Authorized	23
Post-Inspect	44
Cancelled	1
TOTAL	913

The following is a brief explanation of each status:

- “Initiated” means the proposal has been submitted to Kentucky Power Company but not yet assigned to vendor for survey and engineering, either because Kentucky Power needs additional information before assigning the proposal to a vendor or because Kentucky Power has not yet completed its internal review.
- “Pending” means the proposal has been assigned to a vendor for survey and engineering and includes proposals on which the survey and engineering are complete, but the applicant has not yet paid the make-ready estimate.
- “Construction” means the make-ready estimate has been paid and the make-ready work is currently being performed by Kentucky Power Company.
- “Authorized” means construction is complete and the completion notice has been sent to the applicant. Applicant to notify Kentucky Power Company when work is complete.
- “Post-Inspect” means a proposal has been released for installation of attachments by the applicant and Kentucky Power Company is awaiting notice of completion.
- “Approved” means the applicant has passed post-construction inspection (if applicable) and is attached to Kentucky Power Company poles.
- “Cancelled” means the applicant has withdrawn the proposal.



Kentucky PSC Filing

09/15/25

Kentucky Utility & Charter High Volume Agreement

POLES CURRENTLY IN EACH PHASE OF PROCESS (as of Sept. 5, 2025)						
STATUS	RESPONSIBLE	TOTAL POLES	POLES ON TIME	POLES LATE	% POLES ON TIME	% POLES LATE
FIELD SURVEY and ENGINEERING (30 days)	KU	4,894	4,887	7	99.9%	0.1%
MAKE READY ESTIMATE (14 days)	KU	47	33	14	70.2%	29.8%
MAKE READY PAYMENT (14 days)	CHARTER	2,560	1,231	1,329	48.1%	51.9%
MAKE READY CONSTRUCTION (no timeline)	KU	5,438	N/A	N/A	N/A	N/A
AWAITING FOREIGN-OWNED POLE REPLACEMENT		680	N/A	N/A	N/A	N/A
COMMS MAKE READY / INSTALLATION (60 days)	CHARTER	14,517	4,817	9,700	33.2%	66.8%
POST-CONSTRUCTION INSPECTION (60 days)	KU	3,635	1,911	1,724	52.6%	47.4%
INSTALLATION DEFECT DETECTED	CHARTER	705	178	527	25.2%	74.8%
COMPLETE	N/A	460	N/A	N/A	N/A	N/A
TRANSMISSION (no timeline)	KU	0	N/A	N/A	N/A	N/A
CANCELED	N/A	2,152	N/A	N/A	N/A	N/A
TOTAL		35,088		12,774		

CUMULATIVE POLES PROCESSED SINCE MARCH 1, 2024 (as of Sept. 5, 2025)						
STATUS	RESPONSIBLE	TOTAL POLES	POLES ON TIME	POLES LATE	% POLES ON TIME	% POLES LATE
FIELD SURVEY and ENGINEERING (30 days)	KU	30,615*	29,602	1,013	96.7%	3.4%
MAKE READY ESTIMATE (14 days)	KU	29,059	23,421	5,638	80.6%	19.4%
MAKE READY PAYMENT (14 days)	CHARTER	29,045	6,818	22,227	23.5%	76.5%
MAKE READY CONSTRUCTION (no timeline)	KU	22,812	N/A	N/A	N/A	N/A
COMMS MAKE READY / INSTALLATION (60 days)	CHARTER	19,375	6,635	12,740	34.2%	65.8%
POST-CONSTRUCTION INSPECTION (60 days)	KU	4,858	2,837	2,021	58.4%	41.6%
INSTALLATION DEFECT DETECTED	CHARTER	2,117	845	1,272	39.9%	60.1%
COMPLETE	N/A	460	N/A	N/A	N/A	N/A
TRANSMISSION (no timeline)	KU	2,379	N/A	N/A	N/A	N/A
CANCELED	N/A	2,152	N/A	N/A	N/A	N/A

*35,146 Poles have been submitted in the high volume plan. This total excludes canceled applications and applications containing Transmission poles.


Co-Op Update

POLE OWNERS UTILIZING ALDEN ONE

Greater Stage	Responsible Party	Status	Blue Grass Energy	Clark Energy	Fleming-Mason Energy	Inter-County Energy	Owen Electric	Shelby Energy Cooperative	South Kentucky RECC	Taylor County RECC	GRAND TOTAL
Pre-Draft	Attacher	Created	5	48	344	587		1			985
Review	Pole Owner	Review	290	143	982	149		95	242	37	1,938
	Attacher	Revise Application			17	54		443			514
Survey	Pole Owner	Survey	1,568	245	2,713	285			485	381	5,677
	Pole Owner	Survey Overdue	4,043	1,065	3,289	3,154		12	3,135	1,832	16,530
	Both Parties	Survey Review	52	43	179	293			971	169	1,707
Make Ready	Pole Owner	Estimate Make-Ready Costs			41	306				102	449
	Pole Owner	Estimate Overdue							1,042		1,042
	Attacher	Awaiting Customer Response	369	452		335			706	146	2,008
	Attacher	Customer Response Overdue	425	127	166	1,012					1,730
	Attacher	Awaiting Make-Ready Payment	279	131	177			115		44	746
	Attacher	Make-Ready Payment Overdue					23				23
	Pole Owner	Make-Ready Construction Pending	548	514		56			535		1,653
Construction	Pole Owner	Make-Ready	1,187	127	172	96		89	422	51	2,144
	Pole Owner	Make-Ready Overdue		148	9						157
	Attacher	Ready To Attach	5,588	1,250	1,691	913		277	927		10,646
	Attacher	Ready to Overlash	120		2						122
	Attacher	Attachment Extension		191	164	292		308			955
	Attacher	Attachment Extension Review	6,679	551	1,333	1,881		468			10,912
Post Inspection	Pole Owner	Post Inspection	2,093	106	1,194	1,126		550	32	165	5,266
	Pole Owner	Post Inspection Overdue	3,210	621	5,781	2,694		1,413	7		13,726
	Attacher	Corrections Needed	420		592	496					1,508
True Up	Pole Owner	True-Up Billing							1		1
	No Action Needed	Complete				2			1		3
GRANDTOTAL			26,876	5,762	18,846	13,754	3,771	41	8,630	2,762	80,442

Remaining Pole Owners

MUNICIPAL AND TVA EXCLUDED

Pole Owner		POLES
AEP		436
AT&T		3,181
Cumberland Valley Electric		157
Grayson RECC		1,305
Jackson Energy Cooperative		427
Kenergy Corporation		1,565
Kentucky Power		22
Meade County Rural Electric		443
Nicholasville Utilities, KY		49
Nolin RECC		98
Princeton Electric Plant Board		267
Salt River Electric		5,404
Taylor County RECC		2,814
Windstream		3,165
Grand Total		19,333



Kentucky 2025 Q2

SIMPLE MAKE-READY TIMELINE

Average Days to Complete

34

Items Transferred or Replaced

25

This data is based on requests where the associated make-ready was completed within the quarter shown and all of the make-ready required meets the FCC definition of simple make-ready.

COMPLEX MAKE-READY TIMELINE

Average Days to Complete

131

Items Transferred or Replaced

193

This data is based on requests where the associated make-ready was completed within the quarter shown and had at least one make-ready required that meets the FCC definition of complex make-ready.



Kentucky 2025 Q2

REQUESTS RECEIVED

Requests Received Containing 1 or More Pole Attachment

36

Proposed Pole Attachments Associated With Requests Received

Structure Type	Qty
Pole	209
Total	209

This data is based on requests that were received during the quarter shown for this report.

MAKE-READY REQUIRED

Requests Received Containing 1 or More Pole Attachment Requiring Make-Ready

16

Proposed Pole Attachments Associated With Requests Requiring Make-Ready

Structure Type	Qty
Pole	73
Total	73

The proposed pole attachment data is based on the total structures associated with a request that requires make-ready on at least one of the structures associated with the request and may include structures that do not require make-ready. Some requests received during the quarter shown for this report have not completed the survey stage to determine if make-ready is required.

PROCESSING TIME

AVG Processing Time (Days)

24.44

Attachments Associated with Requests

Structure Type	Qty
Pole	764
Total	764

This data is based on requests that did not require make-ready and were permitted in the quarter shown for this report and requests that require make-ready and the quote has been sent to the new attach in the quarter shown for this report. These requests may have been received in previous quarters.

COMPLETED REQUESTS

Requests Completed

98

Attachments Associated with Completed Requests

Structure Type	Qty
Pole	767
Total	767

This data is based on requests that were completed in the quarter shown for this report but may have been received in previous quarters. For purposes of this report, completed requests are defined as requests where all processing, make-ready, construction and post-inspection work has been completed.