

**COMMONWEALTH OF KENTUCKY
BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION**

In the Matter of:

APPLICATION OF KENTUCKY)	
UTILITIES COMPANY FOR AN)	CASE NO. 2014-00371
ADJUSTMENT OF ITS ELECTRIC RATES)	

**KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION'S
FIRST DATA REQUESTS TO KENTUCKY UTILITIES COMPANY**

The Kentucky Cable Telecommunications Association, pursuant to the Commission's December 12, 2014 Order setting forth the procedural schedule in this case, hereby submits its first Data Request to Kentucky Utilities Company ("KU"), in accordance with the following Definitions and Instructions.

DEFINITIONS

1. The terms "you," "your" and "the Company" refer to Kentucky Utilities Company.
2. The term "KCTA," refers to the Kentucky Cable Telecommunications Association.
3. The term "Commission" refers to the Kentucky Public Service Commission.
4. "Poles" means utility poles in your electric distribution network in Kentucky that you own or control.
5. "Pole rates" mean the annual charges for use of your poles by any other entity.

INSTRUCTIONS

1. In answering these Data Requests, please furnish all information that is known or available to you, regardless whether the information is possessed directly by you or your agents,

employees, representatives, or investigators, or by your attorneys or their agents, employees, representatives, or investigators.

2. Please identify at the end of each answer the person or persons most knowledgeable about such response and the person or persons responsible for the preparation of such response.

3. If any information responsive to these Data Requests is withheld, identify the Data Requests as to which such information is withheld and the reason(s) for withholding it.

4. For any information that you claim is unavailable, state why it is unavailable. If you cannot respond to the Data Request precisely as it is stated, provide any information that is available that would respond to the Request at a level of detail different from that specified herein.

5. KCTA requests that you produce all documents on which you relied or to which you referred in responding to these Data Requests.

6. Unless otherwise stated, provide requested data as of the following dates: March 31, 2012, and October 2014. To the extent that you rely on forecasted data to support your pole attachment rates, please also provide data for the forecasted time period ending June 30, 2016.

DATA REQUESTS

1-1. Justify your current pole rates under the Commission's pole rate methodology as set forth in PSC Administrative Case No. 251. Please provide all calculations and source data.

1-2. Provide the gross investment in KU Account 364.

1-3. Provide the total number of poles in KU Account 364.

1-4. Provide the gross investment in 35 foot poles in KU Account 364.

1-5. Provide the total number of 35 foot poles in KU Account 364.

- 1-6. Provide the gross investment in 40 foot poles in KU Account 364.
- 1-7. Provide the total number of 40 foot poles in KU Account 364.
- 1-8. Provide the gross investment in 45 foot poles in KU Account 364.
- 1-9. Provide the total number of 45 foot poles in KU Account 364.
- 1-10. Provide the total amount of the depreciation reserve for KU Account 364.
 - a. Provide the depreciation reserve related to the gross investment in 35 foot poles.
 - b. Provide the depreciation reserve related to the gross investment in 40 foot poles.
 - c. Provide the depreciation reserve related to the gross investment in 45 foot poles.
- 1-11. Provide the effective tax rate for KU. Provide all data – including but not limited to data on deductions, exclusions, and credits – necessary to derive an effective tax rate.
- 1-12. Provide continuing property records from KU Account 364, and all relevant sub-accounts of Account 364.
- 1-13. Provide all data and supporting documentation of any survey or audit you, or a third party acting on your behalf, has conducted regarding the number of poles you own between March 31, 2012 to present.
- 1-14. Provide the number of two-party poles, as described in Administrative Order 251, with attachments.
- 1-15. Provide the number of three-party poles, as described in Administrative Order 251, with attachments.

- 1-16. Provide all records from Account 364 that reflect KU's investment in appurtenances.
- 1-17. Provide the total number of the depreciation reserve for Account 364.
- 1-18. Provide the costs in KU Account 593.
- 1-19. Provide the data for all subaccounts of KU Account 593.
- 1-20. Provide the expenses in Accounts 920-931.
- 1-21. Provide KU's administrative and general costs.
- 1-22. Provide KU's gross investment in all plant.
- 1-23. Provide KU accumulated depreciation for all plant.
- 1-24. Provide the average rate for electric residential customers based on your forecasted data that would result if the Commission were to grant all of the Company's rate requests in this proceeding.
- 1-25. Provide the current number of electric residential customers.
- 1-26. Please provide the amount that an average KU residential customer's monthly electric bill would change from the amount forecasted by the Company for the test year if the Commission were to reduce KU's current annual pole attachment rates by \$1, \$2, \$3, or \$4 and the amount of that reduction were to be recovered from electric ratepayers. In making these calculations, assume that the Company's revenue requirement, as proposed by the Company, is unchanged. Please also assume that the pole attachment fee reductions are to be recovered from residential users in the same percentage that the Company's revenues are proposed to be recovered from residential customers (according to Ex. MJB-3, page 9, approximately 35%).

1-27. Making the same assumptions as requested in DR No. 1-26, if the Commission were to reduce KU's current annual pole attachment rates by \$1, \$2, \$3, or \$4, what effect would it have on KU's overall rate of return?

Respectfully submitted,

/s/ Laurence J. Zielke
Laurence J. Zielke
Janice M. Theriot
Zielke Law Firm, PLLC
1250 Meidinger Tower
462 South 4th Street
Louisville, KY 40202
(502) 589-4600

Gardner F. Gillespie (*application for pro hac vice admission pending*)
Amanda M. Lanham (*application for pro hac vice admission pending*)
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW
Suite 100
Washington, DC 20006
(202) 747-1900
ggillespie@sheppardmullin.com
alanham@sheppardmullin.com

**ATTORNEYS FOR THE KENTUCKY CABLE
TELECOMMUNICATIONS ASSOCIATION**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Kentucky Cable Telecommunications Association's First Data Requests to Kentucky Utilities has been served on all parties of record via hand delivery, facsimile, or electronically this 8th day of January, 2015.

/s/ Laurence J. Zielke
Laurence J. Zielke
Janice M. Theriot