

**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
SUPPLEMENTAL 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 Supplemental Data Requests 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. For all data you produce, please produce it in its native electronic format (e.g., all Microsoft Excel spreadsheets should be produced in Excel format).

7. Unless otherwise stated, provide requested data as of the following dates: March 31, 2012, and October 31, 2014, and if different, the date conforming to Conroy Exhibit M4 from Case No. 2012-00221. 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.

SUPPLEMENTAL DATA REQUESTS

2-1. Provide all data in native electronic format to support the Account 593 Subaccount Detail summary figures provided in your response to KCTA's Data Request Number 1-19.

2-2 To the extent not otherwise clearly identified in the Subaccount Detail data provided in response to request 2-1, identify each and every credit item associated with a regulatory asset, including, but not limited to the Winter Wind Storm Regulatory Asset (as identified in KU's attachment to its response to KCTA's Request 1-20 in Case No. 2009-00548).

2-3. In response to KCTA Request Number 1-1, KU provided Conroy Exhibit M4 from Case No. 2012-00221. Conroy Exhibit M4 provides data as of October 31, 2009. Please confirm that this is a typographical error and provide the accurate date for the data provided.

2-4. Provide KU's total labor expenses from KU's general ledger for all accounts as of March 31, 2012 and October 31, 2014, and if different, the date conforming to Conroy Exhibit M4 from Case No. 2012-00221.

2-5. Provide all records that reflect KU's investment in minor appurtenances. For purposes of this question, minor appurtenances include, but are not limited to, aerial cable clamps, pole top pins, and all other appurtenances and hardware that are not poles or major appurtenances.

2-6. Are the costs of minor appurtenances (as defined in Request 2-5) excluded from the KU pole-cost figures used in Conroy Exhibit M4?

2-7. If the answer to the preceding request is anything other than an unqualified yes, please provide data to support that response, including identification of the specific account or

subaccount the costs of minor appurtenances have been booked to, and the amounts of such costs booked to the identified account or subaccount.

2-8. According to Mr. Seelye's Rebuttal Testimony in Case No. 2009-00548, the costs for aerial cable clamps, pole top pins "and other such items that relate to connecting conductors to poles" are recorded by KU in Account No. 365 and No. 368. Please provide evidence that this is the case.

2-9. For each of the following items, indicate whether KU has investment for the items in Account 364:

Anchors,

Head arms,

Strain insulators,

Pole plates,

Excavation and backfill, including disposal of excess material,

Extension arms,

Foundations,

Guards,

Insulator pins and suspension bolts,

Paving,

Permits for construction,

Pole steps and ladders,

Racks,

Railings,

Reinforcing and stubbing,

Settings,

Shaving, painting, gaining roofing, stenciling and tagging,

2-10. For each of the items in the previous data request for which KU has investment in Account 364, please indicate whether all of the investment in such items is included in any or all of the following subaccounts: “brackets”, “cross arms”, “fence”, “guy” and “platforms”.

2-11. Are the “installed cost” figures on page 1 of Conroy Exhibit M4 based on gross or net investment?

2-12. With regard to Conroy Exhibit M4, please explain (separately for each item) the basis for KU to have applied the “rate of return,” “depreciation sinking fund,” and “income tax” components of its carrying charge, each of which contains inputs under regulatory and/or accounting practice based on net book costs, to gross pole costs without either netting those figures to reflect depreciation and accumulated deferred taxes or applying an adjustment for the ratio of net to book costs. As part of this response, provide any and all support for KU’s application for inputs based on net book costs to gross investment cost figures.

2-13. With regard to Conroy Exhibit M4, and comparing to the comparable exhibit in Case No, 2009-00548, please provide a detailed explanation (separately for each item) along with supporting cost and continuing property records data, of the reduction in quantity of 40 foot poles from 142,251 poles to 132,480 poles and the corresponding increase in total installed costs from \$78,741,981 to \$83,496,635, and the reduction in the quantity of 45 foot poles from 63,914 to 61,269 poles and the corresponding increase in total installed costs from \$48,216,502 to \$54,544,545.

2-14. With regard to responses to KCTA Request Number 1-6 to 1-9, please provide a detailed explanation (separately for each item), along with the supporting cost data, of the

increase in average bare pole cost between March 31, 2012 and October 31, 2014, for 40 and 45 foot poles, respectively.

2-15. What is the number of kilowatt hours used by a residential customer on average per year?

2-16. What is the total number of kilowatt hours used by all residential customers per year?

2-17. What was the total percentage revenue increase for KU's electric service according to Case No. 2009-00548?

2-18. What was the total percentage revenue increase for KU's electric service according to Case No. 2012-00221?

2-19. What is the total percentage revenue increase KU requests in the current rate case, Case No. 2014-00371?

2-20. Please provide transcripts of any testimony in Case No. 2012-00221 in which the actual pole attachment rates and/or methodology regarding pole attachment rates were discussed before the Commission.

2-21. Please provide KU's gross distribution plant investment.

2-22. Please provide KU's accumulated depreciation reserve for distribution plant.

2-23. Please provide the amount in KU Account 190.

2-24. Please provide the amount in KU Accounts 281-283.

2-25. Please provide the amount in KU Account 408.1.

2-26. Please provide the amount in KU Account 409.1.

2-27. Please provide the amount in KU Account 410.1.

2-28. Please provide the amount in KU Account 411.4.

2-29. Please provide the amount in KU Account 411.1.

2-30. Please provide the embedded costs in KU Accounts 365 and 369.

2-31. According to Mr. Seelye's Rebuttal Testimony in Case No. 2009-00548, he believes KU has been using a levelized rate since the early 1980s. Please provide any and all data to support that statement, including, but not limited to, KU's pole rate calculations and supporting work papers pertaining to the early 1980s.

2-32. Please identify the basis of the Company's CATV pole attachment charge prior to the early 1980s.

2-33. Please identify any and all other jurisdictions of which KU is aware where the "levelized carrying charge approach," as applied by KU, has been used to determine a CATV pole attachment rate, including the use of a sinking fund methodology for calculating depreciation and a rate of return based on net book cost, along with any supporting documentation.

2-34. Please indicate whether there are vintages of pole plant remaining in service that are older than 35 years. If the answer is anything other than an unqualified no, please identify the percentage of KU's pole plant in service associated with these older vintages of plant.

Respectfully submitted,

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**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 Supplemental Data Requests to Kentucky Utilities has been served on all parties of record via hand delivery, facsimile, or electronically this 6th day of February, 2015.

/s/ Laurence J. Zielke

Laurence J. Zielke

Janice M. Theriot