

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

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE	)	
GAS AND ELECTRIC COMPANY FOR AN	)	CASE NO.
ADJUSTMENT OF ITS ELECTRIC AND GAS RATES	)	2016-00370
AND FOR CERTIFICATES OF PUBLIC CON-	)	
VENIENCE AND NECESSITY	)	

**AT&T KENTUCKY’S SUPPLEMENTAL REQUESTS FOR INFORMATION**  
**TO KENTUCKY UTILITIES ELECTRIC COMPANY**

Pursuant to the Commission’s Order of December 13, 2016 and 807 KAR 5:001, Section (12), AT&T Kentucky<sup>1</sup> requests KU<sup>2</sup> to file and serve responses to the following Requests for Information (“Requests”) by January 25, 2107.

**DEFINITIONS AND INSTRUCTIONS**

1. In preparing the responses to these Requests, please provide the text of each Request immediately before your response to that Request.
2. Answer each Request separately and fully in writing under oath, unless it is objected to, in which case the reasons for objection must be stated in lieu of an answer.
3. The term “document” refers to any recorded, printed, computer-stored, computer-generated, typewritten, handwritten or other information of whatever character, including but not necessarily limited to letters or other correspondence, communications, memoranda, notes, notes of conversations, telephone calls, or meetings, telegrams, bulletins, agreements, calendars, diaries, telephone calls, records and slips, handwritten notes, inspections, or inspection reports,

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<sup>1</sup> BellSouth Telecommunications, LLC d/b/a AT&T Kentucky

<sup>2</sup> Kentucky Utilities Company

trip reports, tabulations, financial papers (grants, loans, etc.) and records thereof, work papers, reports, prints, slides, movies, videotapes, programs, or any other pictorial representation of any kind or nature, tape recordings, or other mechanical or electronic recordings. "Document" shall also expressly include "e-mail," computer data recorded on a hard drive or disk, or otherwise retrievable through computers or computer systems.

4. The term "describe" means to represent or give an account of in writing and with specificity and particularity any conversation, testimony, document, person, other item or oral communication.

5. If any Request is objected to on the ground that it requests information that is privileged or falls within the work-product doctrine, please respond to the Request to the extent that it is not objectionable, and please provide the following information:

- a) State the nature and basis of the privilege or doctrine you claim;
- b) If a document is involved:
  - (i) identify it stating the date and type of document (e.g., letter, memorandum, report), its present location and the name and address of its custodian, a summary of its contents, the name and address of the person(s) who drafted, prepared and/or signed it;
  - (ii) identify all persons known to you who have seen the document; and
  - (iii) specify their relationship to the author;
- c) If an oral communication is involved:
  - (i) identify it;
  - (ii) specify its date, purpose and place it was made;
  - (iii) identify all persons known to you to whom the substance of the oral communication has been disclosed; and
  - (iv) specify their relationship to the speaker.
- d) State all other facts relied upon by you for your claim of privilege or work-product doctrine.

6. If you cannot answer any Request for Admission or Interrogatory in full, answer to the fullest extent possible, specify the reason for your inability to answer the rest of the Request for Admission or Interrogatory and state whatever information or knowledge you have concerning the unanswered portion, and describe the efforts you have made to obtain information necessary to answer that Request for Admission or Interrogatory.

7. If you are aware of any document which is requested but is no longer in your possession or control, identify each such document and state whether it is:

- a) Missing or lost;
- b) Destroyed;
- c) Transferred voluntarily or involuntarily to others, and provide their names and address(e); or
- d) Otherwise disposed of and in each instance describe the circumstances surrounding the disposition and state the date or approximate date when it happened.

8. "Proposed tariff" means all tariff provisions filed in this case that address the rates, terms, and conditions of attachments to KU poles and structures, including without limitation P.S.C. No. 18, Original Sheet No. 40 through Original Sheet No. 40.19.

9. KCTA means Kentucky Cable Telecommunications Association.

### **REQUESTS FOR INFORMATION**

S1. To the extent that any of your answers to AT&T Requests for Information Nos. 1-23 are different now than they were when you provided those answers, please provide revised answers.

S2. Please refer to KU's Response to KTCA's Request for Information No. 1-10 (providing, in part, "The Wireless Facility owner will have conduit running through the initial presumed 13.17 feet of usable space on the pole, which it shares with KU.").

- a. Does KU charge for "conduit" in usable space in these situations?
- b. Does KU charge for "conduit" in unusable space in these situations?
- c. To the extent your answer to S2.a or S2.b is anything other than an unequivocal "no," please:

- i. State whether the referenced conduit prevents other attachers from using that space.
  - ii. Describe in detail your rationale for charging for conduit.
  - iii. State the amount you propose to charge for conduit and identify all documents, including without limitation workpapers, photographs, and schematics, that support this amount.
  
- S3. Please refer to page 57 of 97 of the Attachment to KU's Response to KTCA's Request for Information No. 1-16. Would KU allow wireless carriers to place antennas mid-pole as depicted in the diagram on this page of the Attachment? If your answer is anything other than an unequivocal "no," please:
  - a. State the rate you propose to charge for such placement and identify all documents, including without limitation workpapers, photographs, and schematics, that support this amount.
  - b. Please explain with specificity whether the use of mid-pole antennas as depicted in this diagram (i.e. the antenna being below electric facilities) would eliminate or ameliorate the concerns raised in response to AT&T's Request for Information No. 10 for Performance Assurance.
  
- S4. Please refer to page 22 of 39 of the Attachment to KU's Response to KTCA's Request for Information No. 1-16 and to page 27 of 39 of the Attachment to KU's Response to KTCA's Request for Information No. 1-16 (providing, in part, "The height of all poles used to mount antennas must be increased by a minimum of five feet above the existing pole's height. The cost of the taller pole is the responsibility of the attacher. (Pole height not to exceed 60' above ground.>"). Explain in detail why increasing the usable space by 5 feet by adding 5 feet to the top of the pole would not increase the usable space for rate computation purposes.
  
- S5. Based on KU's and LG&E's respective responses to AT&T's Request for Information No. 4, the total number of distribution poles is 487,192. The pole attachment rate development, however, only reflects a total of 385,036 distribution poles. (*See, e.g.,* Attachment to KU's Response to Commission Staff's First Request for Information No. 54, file names Att\_LGE\_PSC\_1-54\_PoleAttach.xlsx and Att\_KU\_PSC\_1-54\_PoleAttach.xlsx).
  - a. Please explain this 102,156 difference in the number of distribution poles.
  - b. If the 487,192 number of distribution poles were used in the development of KU's pole attachment rate, what would that proposed pole attachment rates be?
  - c. Please identify all documents, including without limitation workpapers, photographs, and schematics, that support your answer to Request No. S5.b.
  
- S6. Please explain in detail why KU developed its proposed pole attachment rates using a combined number of LG&E and KU distribution poles instead of using only the number of KU distribution poles.

- S7. In developing its proposed attachment rates, did KU use cost and other information solely from its own poles and operations, or did it combine cost and other information from its poles and operations with cost and other information from LG&E's poles and operations? To the extent that KU combined its cost and other information with that of LG&E, please:
- a. identify each input it used in developing its proposed pole attachment rates;
  - b. for each input identified, state whether it used its own information regarding that input or a combination of its information and that of LG&E;
  - c. to the extent that it used a combination of information, please explain in detail why it did so instead of using solely its own information.
  - e. State what the proposed pole attachment rates would have been had KU used solely its own information instead of combining any of its information with the information of LG&E.
  - f. Please identify all documents, including without limitation workpapers, photographs, and schematics, that support your answer to Request No. S7.e.
- S8. Please state how many of the 11 wireless attachments on KU poles (*see* KU's answer to AT&T's Request for Information No. 5) are pole top antennas and, for all that are not, please describe what type of attachment is involved.
- a. For each attachment, please state either that the rates in KU's proposed tariffs apply or describe in detail the rates that apply to the attachment.
  - b. Please identify all documents, including without limitation workpapers, photographs, and schematics, that support your answer to Request No. S8.b.
- S9. State the average pole height for wireless attachments KU used in calculating the proposed pole attachment rates, and identify all documents, including without limitation workpapers, photographs, and schematics, that support your answer. If your answer is anything other than the 47.73 feet average height of all KU distribution poles on which wireless facilities are attached that is set out KU's answer to AT&T's Request for Information No. 5, please explain in detail all reasons for the difference.
- S.10 Please refer to page 27 of 39 of the Attachment to KU's Response to KTCA's Request for Information No. 1-16 (providing, in part, "The height of all poles used to mount antennas must be increased by a minimum of five feet above the existing pole's height. The cost of the taller pole is the responsibility of the attacher. Pole height not to exceed 60' above ground."). For each wireless attachment currently on an KU pole:
- a. Describe in detail what, if any, make ready costs were incurred; and
  - b. State whether a taller pole was required as a result of the attachment.
- S.11 Please refer to page 22 of 39 of the Attachment to KU's Response to KTCA's Request for Information No. 1-16 (setting out a 48" minimum clearance between the bottom of the antenna and the top of the conductor). In light of this 48" clearance, please explain in detail why KU assumed a 5 foot clearance in developing its proposed attachment rate.

- S.12 Please refer to KU's response to AT&T Request for Information No. 6 (providing, in part, "KU's bucket trucks are typically not capable of reaching higher than 60 feet above ground.").
- a. Would KU permit wireless attachments on poles that are higher than 60 feet if a mid pole antenna (lower than 60 feet above ground) were used instead of pole top antenna?
  - b. Please explain in detail how maintenance is performed on KU's poles that are higher than 60 feet high. (*See, e.g.,* KU's Response to AT&T Request for Information No. 11).
- S.13 Please refer to KU's response to AT&T Request for Information No. 11. Provide a detailed description of the following (under the column heading "Retirement Unit"):
- a. Bracket – 1 Wire
  - b. Bracket – Neutral Fastening
  - c. Concrete Poles
  - d. Cross Arms
  - e. Fence
  - f. Guy
  - g. H Frame Structure
  - h. H-Beam Steel Guy
  - i. Knee Braces
  - j. Platform
  - k. Platforms New (05491)
  - l. Pole Wood X FT (Dist)
  - m. Pole Steel X Ft
  - n. Poles, Modified
  - o. Steel Poles
  - p. Tower – 110 ft Steel Type F
  - q. Towers
  - r. X Braces
  - s. Z Frame Set
- S.14 Please refer to KU's and LG&E's Response to AT&T Request for Information No. 11 and KU's Response to Commission Staff's First Request for Information No. 54, file name Att\_KU\_PSC\_1-54\_PoleAttach.xlsx.
- a. Please explain the differences in the gross plant and quantities included in the "Cost Support for Attachment Charges" in response to the Staff's Request and the inventories provided in response to AT&T Request for Information No. 11.
  - b. Please provide the pole investment and quantity inventory used to develop the Cost Support for Attachment Charges in response to the Staff's Request.
  - c. Please identify all documents, including without limitation workpapers, photographs, and schematics, that support the Cost Support for Attachment Charges

in response to the Staff's Request and the Gross Plant by Pole Size, Cash Working Capital, and Common Plant in response to AT&T's Request.

- S.15 Is KU's Response to AT&T Request for Information No. 11 based on information from Kentucky only, or is it based in whole or in part on information from other States? If the response is based, in whole or in part, on information from other states, please provide a revised response that is based on information from Kentucky only.
- S.16 Please produce all documents identified in, described in, or supporting your response to each Request above, and identify with specificity which documents support the response to which Request.

Respectfully submitted,

/s/ Cheryl R. Winn  
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**FILING NOTICE AND CERTIFICATE**

The undersigned hereby certifies that the foregoing is a true and accurate copy of the same document being filed in paper medium with the Commission within two business days; that the electronic filing was transmitted to the Commission on February 7, 2017; and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding.

/s/ Cheryl R. Winn