

**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 )	2016-00371
RATES AND FOR CERTIFICATES OF PUBLIC )	
CONVENIENCE AND NECESSITY )	

**KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION'S  
FIRST REQUESTS FOR INFORMATION TO LOUISVILLE  
GAS AND ELECTRIC COMPANY**

The Kentucky Cable Telecommunications Association, pursuant to the Commission's December 13, 2015, Order setting forth the procedural schedule in this case, hereby submits its first Data Request to Louisville Gas and Electric Company ("LGE"), in accordance with the following Definitions and Instructions.

**DEFINITIONS**

1. The terms "You," "Your," and "the Company" refer to Louisville Gas and Electric Company.
2. The term "KCTA," refers to the Kentucky Cable Telecommunications Association.
3. The term "Commission" refers to the Kentucky Public Service Commission.
4. The term "Poles" refers to utility poles in Your electric distribution network in Kentucky that You own or control.
5. The term "Wireless Attachment Charge" refers to any charge associated with the placement of any Wireless Facility on Your poles or other component of Your local distribution network.

6. The term “Proposed Tariff” refers to the Pole and Structure Attachment Charges issued November 23, 2016, by Robert M. Conroy, Vice President, State Regulation and Rates, in connection with this proceeding.

7. All capitalized terms not defined herein shall have the meanings given to them under the Proposed Tariff.

### **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 Your response to each Data Request 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 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 and is responsive to the Request at a level of detail different from that specified herein.

5. KCTA requests that You produce all documents referenced in any response or that you referenced, review, or relied upon to respond to any Data Request.

6. To the extent that You rely on forecasted data to support Your rates and other tariff adjustments, please provide data for the forecasted time period ending June 30, 2018.

## **DATA REQUESTS**

1-1. Provide the basis for Your proposed exclusion of (a) incumbent local exchange carriers with joint use agreements, (b) facilities subject to a fiber exchange agreement, and (c) Macro Cell Facilities from Your Proposed Tariff.

a. Please provide all data related to the basis for different charges to these users of Your Poles.

b. Please provide all agreements with such users related to the rates, terms, and conditions of Attachment to Your Poles.

1-2. Provide a copy of any internal construction standards and/or specification to determining the “Communications Space” on poles set forth under the Proposed Tariff.

1-3. Explain the basis for excluding street light poles from the definition of Structure.

1-4. Explain the basis for excluding poles leased to a third party from the definition of Structure.

1-5. Explain the meaning of a “third party” to whom You may lease poles.

1-6. Explain the meaning of “wireless communications services,” including whether the term is intended to apply to Wi-Fi.

1-7. Explain whether Wireless Facility in the Proposed Tariff includes only facilities attached directly to a Structure.

1-8. Explain how Wireless Facilities attached to a Cable Television System Operator’s messenger strand will be treated under the Proposed Tariff.

1-9. Explain the basis for the Proposed Tariff’s rate for Wireless Attachments, including the methodology, and all cost data relevant to calculating the Wireless Attachment

Charge of \$84.00 per year for each Wireless Facility. Please provide all source data for the charge and explain how You developed or obtained the source data.

1-10. Please refer to Your Application, Tab 14, Testimony of William Steven Seelye, Managing Partner, The Prime Group, LLC, at p. 61. Explain and provide data related to Your conclusion that the Wireless Facilities on average use 11.585 feet of Pole space, including but not limited to how such average was determined, what Wireless Facilities were considered for determining such average, and identification of the “space” used by such attachments.

1-12. Provide the basis for, methodology to determine, and data used to develop Your Duct charge of \$0.81 per linear foot, including all rate calculations.

1-13. Explain what You mean by the word “utilize” in proposed Terms and Conditions of Attachment No. 4.

1-14. Please provide any reports, analysis, or studies concerning the impact on pole loading of overlashing by Cable Television System Operators, including data related to instances of overlashing by Cable Television System Operators overloading any distribution poles.

1-15. Please provide any reports, analysis, or studies concerning the impact of Cable Television System Operator drop or lift attachments on pole loading, including data related to instances of drop or lift attachments overloading any distribution or drop poles.

1-16. Please provide a copy of all of Your standards and specification related to the design, installation, and maintenance of Attachments with which You propose Attachment Customers must comply.

1-17. Explain the basis for and data related to the proposed requirement of Terms and Conditions of Attachment No. 8(j) to impose a 50 percent surcharge on Attachment Customers that do not adequately make adjustments upon 30 days’ notice.

1-18. Explain the basis for and provide any data related to the proposal to require an on-off switch for each and every Wireless Facility installation.

a. Do You intend to apply Your proposal to require an on-off switch to Wi-Fi access points?

1-19. Explain the basis for and provide all data related to Your proposed requirement that no bundle of cables shall exceed two inches in diameter, including any safety or engineering reports or analyses on which this proposal is based.

1-20. Explain the procedures and processes You will use to “verify the number, location, and type of Attachment Customer’s Attachments” under proposed Terms and Conditions of Attachment No. 13.

1-21. Explain the basis for and provide data related to how You will determine whether an Attachment is “unauthorized.”

1-22. Explain the basis for and provide data related to the penalty You propose for Unauthorized Attachments, including data related to the cost basis of such proposed penalty.

1-23. Please provide data identifying the design and purpose of the Your proposed Advanced Metering System (“AMS”) and Distribution Automation Project (“DA”), including the nature of any wireline facilities necessary to provide AMS and DA.

1-24. Please explain how the AMS and DA systems will make use of distribution poles, including the extent and nature of and attachment of wires and facilities to Poles, the Pole space to be used, and the location on the Poles to be used by any such wires and facilities.

a. Provide data related to any proposed installation of meters and/or equipment necessary to support the meters on Your Poles. Please include data showing where the equipment will be located and changes to existing pole facilities and Attachments that may

be required to accommodate proposed AMS and DA systems as well as the basis for any such changes.

1-25. Please identify all communications services that the proposed AMS and DA could be used to provide.

1-26. Please provide data related to the radiofrequencies that the meters will use, the meters' abilities to communicate with other equipment and facilities, and any analysis of interference with other Attachments on the Poles.

1-27. Please explain the impact of the proposed AMS and DA on existing wireline and wireless attachments of Attachment Customers, including whether rearrangement of the existing Attachment Customers' facilities or other make ready will be required to accommodate deployment of AMS and DA. If rearrangement of the existing Attachment Customers' facilities or other make ready work is required, please explain the allocation of costs of such work and whether Term and Condition No. 15 of the Proposed Tariff will apply.

1-28. Please provide a copy of the "strategic network design study" referenced at Your Response to Commission Staff's First Requests for Information (filed Dec. 8, 2016) Response to Request No. 12 at p. 3.

1-29. Explain the authority you are seeking through your application for a Public Convenience and Necessity ("CPCN"), including whether such authority will authorize You to provide communications services to any third party.

1-30. Please explain whether You intend to increase the electric rate(s) charged to Cable Television System Operators and Telecommunications Carriers and, if so, the percentage increase(s) of the rate(s).

Respectfully submitted,

/s/ Laurence J. Zielke

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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 First Data Requests to Louisville Gas and Electric Company has been served on all parties of record via hand delivery, facsimile, or electronically this 11th day of January, 2017.

/s/Janice M. Theriot  
Janice Theriot