

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

In the Matter of:

ELECTRONIC APPLICATION OF LOUISVILLE )  
GAS AND ELECTRIC COMPANY FOR AN )  
ADJUSTMENT OF ITS ELECTRIC AND GAS )  
RATES AND FOR CERTIFICATES OF PUBLIC )  
CONVENIENCE AND NECESSITY )

Case No.  
2016-00371

**KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION'S  
SECOND 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 Second Requests for Information 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. The term “First Responses” refers to Your Response to KCTA’s First Requests for Information dated January 25, 2017.

8. 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**

2-1. Please refer to First Responses 1-7. Please provide examples of “wireless facilities” that do not require direct attachment to a Structure.

2-2. For wireless facilities that are not attached to a Structure, will such facilities categorically be subject to the Wireless Attachment Charge?

a. If yes, please explain why the Wireless Attachment Charge is appropriate for such facilities.

b. If no, please explain what, if any, charges will apply to wireless facilities that are not attached to a Structure.

2-3. Please refer to First Responses 1-8. Will any strand-mounted wireless facility be subject to a separate charge where the strand does not require additional clearance as a result of the strand mounted Wi-Fi access point?

a. If the answer is yes, please identify all such devices.

b. If strand-mounted Wi-Fi access points constitute an “attachment,” explain any separate charges applicable to strand-mounted facilities and how such charges are proposed to be calculated.

2-4. Please refer to First Responses 1-10. Does the existence of conduit running through the initial presumed 13.17 feet of usable space prevent You or any other Attachment Customer from making use of the space? If the answer is yes, please explain and provide all data relevant to Your explanation.

2-5. Does the Wireless Attachment Charge apply only to pole top wireless antenna attachments?

a. If the answer to Request 2-5 is no, identify the nature of all other Wireless Facilities to which the Wireless Attachment Charge applies.

b. If the answer to Request 2-5 is no, explain whether all Wireless Facilities, irrespective of their location on the pole, occupy 11.585 feet of pole space?

c. If the answer to Request 2-5 is no, please explain the amount of space occupied by Attachments identified in response to Request 2-5(a).

2-6. Are Attachment Customers entitled to rebut the presumption that Wireless Facilities occupy 11.585 feet of pole space?

a. If the answer to Request 2-6 is no, please explain the basis for your conclusion that the space occupancy presumption is not rebuttable.

2-7. Please refer to First Responses 1-14. Explain and provide all data related the degree to which overlashed cables increase the weight, tension, and diameter of an existing cable.

2-8. Please refer to First Response 1-20.

a. Identify and provide a copy of any materials provided to personnel or contractors used in conducting Attachment audits.

b. Explain how Your personnel or contractors will determine Attachments are unauthorized from visual field inspections, including how they will determine the identity of the entity whose Attachment is unauthorized.

c. Explain what reports and other data Your personnel or contractors will be required to submit to verify the number, location, and type of Attachments.

d. Explain the procedures Attachment Customers may use to dispute the accuracy of the visual inspection conducted by Your personnel or contractors.

2-9. Please refer to First Response 1-21.

a. Explain Your procedures and policies for “spot inspections.”

b. Explain the procedures and policies that relate to “periodic inspections,” including how they differ from spot inspections, who will conduct them, how frequently You will conduct them, and what information will be collected and shared with Attachment Customers regarding any unauthorized Attachments.

c. Explain the procedures by which an Attachment Customer may dispute the accuracy of alleged unauthorized Attachments identified through any spot inspections or periodic inspections.

2-10. Please refer to First Responses 1-23. For AMS field devices that use private fiber optic cable for communications, where will the fiber optic cables attach to Your poles?

a. Will fiber optic cables be placed in the communications space?

b. Will You use existing fiber optic cables or lease fiber strands from third parties to meet the needs of your AMS field devices?

2-11. Please refer to First Responses 1-24. Where will You place electronic sectionalizing devices on distribution poles?

2-12. Please refer to First Responses 1-26. Have you prepared any study of the type and extent of make ready necessary for deploying AMS field devices across Your distribution network?

a. Do you intend to undertake any such study or analysis?

2-13. Please refer to First Responses 1-27. Do you know how many poles you will need to replace to accommodate AMS equipment?

a. Who will pay for pole replacements necessary to accommodate AMS equipment?

2-14. Please refer to First Responses 1-27. On how many poles will you require third party Attachment Customers to move or rearrange their Attachments to accommodate AMS equipment?

2-15. Please refer to First Responses 1-29. Will the CPCN enable you to provide communications services to your customers?

2-16. Please refer to First Responses 1-30.

a. Please state the electric tariff rate charged to cable television providers and telecommunications providers under the existing tariff and under the proposed new tariff.

b. Please explain the basis and cost justification for, as well as any data or documents related to, any electric rate increase imposed on cable television providers and telecommunications providers.

2-17. Please refer to your response to AT&T's Initial Data Requests for Information No. 2. Do all Attachments of Wireless Facilities deployed by Customers A, B, and C conform to your assumptions regarding the amount of space Wireless Facilities occupy?

a. If the answer to Request 2-17 is no, do the Wireless Facilities occupy more or less space than your assumptions?

b. If the answer to Request 2-17 is no, identify and provide (to the extent you have not already done so) do any agreements with the Attachment Customers regarding these Wireless Facilities?

2-18. Please refer to Your Response to AT&T's Initial Data Requests for Information No. 8. Please explain what kinds of "exceptional circumstances" would justify, and have in the past justified, deviations from the PSA Rate Schedule for Attachments of Wireless Facilities.

2-19. Please refer to Your Response to Commission Staff's Second Requests for Information No. 2. Please explain what kinds of data AMS will allow to be remotely communicated.

2-20. Please refer to Your Response to Commission Staff's Second Requests for Information No. 63(b). What, if any, communications services could you offer using ZigBee?

a. If you offered the services listed in response to Request 2-20, would you be required to seek a CPCN to activate the ZigBee communications services?

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 Second Requests for Information to Louisville Gas and Electric Company has been served on all parties of record via hand delivery, facsimile, or electronically this 7th day of February, 2017.

/s/ Janice M. Theriot  
Janice Theriot