

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES)	
COMPANY FOR AN ADJUSTMENT OF ITS)	
ELECTRIC RATES AND FOR)	CASE NO. 2016-00370
CERTIFICATES OF PUBLIC CONVENIENCE)	
AND NECESSITY)	

In the Matter of:

APPLICATION OF LOUISVILLE GAS AND)	
ELECTRIC COMPANY FOR AN)	
ADJUSTMENT OF ITS ELECTRIC AND)	CASE NO. 2016-00371
GAS RATES AND FOR CERTIFICATES OF)	
PUBLIC CONVENIENCE AND NECESSITY)	

**DATA REQUESTS OF
KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO
BELLSOUTH TELECOMMUNICATIONS, LLC D/B/A AT&T KENTUCKY**

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to BellSouth Telecommunications, LLC d/b/a AT&T Kentucky (“AT&T”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on December 13, 2016.

Instructions

1. As used herein, “Documents” include all correspondence, memoranda, notes, e-mail, maps, drawings, surveys or other written or recorded materials, whether external or internal, of every kind or description in the possession of, or accessible to, AT&T, its witnesses, or its counsel.

2. Please identify by name, title, position, and responsibility the person or persons answering each of these data requests.

3. These requests shall be deemed continuing so as to require further and supplemental responses if AT&T receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper, or information as requested does not exist, but a similar document, work paper, or information does exist, provide the similar document, work paper, or information.

5. To the extent that any request may be answered by a computer printout, spreadsheet, or other form of electronic media, please identify each variable contained in the document or file that would not be self-evident to a person not familiar with the document or file.

6. If AT&T objects to any request on the ground that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of AT&T, its counsel, or its witnesses, state: the identity of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If such a document was destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than a reference to the record where the document is located.

Data Requests

KU:

1. State whether Mr. Peters was aware of the PSC Staff Opinion Nos. 2014-014 and 2016-012 when preparing his testimony.
2. Regarding PSC Staff Opinion Nos. 2014-014 and 2016-012, state for each whether Mr. Peters agrees with the PSC Staff analysis. If not, explain why not.
3. State whether Mr. Peters agrees the Kentucky Public Service Commission has elected to regulate the rates, terms, and conditions of service for utility pole attachments of telephone service providers and that the Federal Communication Commission's rules regarding such attachments are not applicable to the rates and conditions of such service.
4. Describe the unique characteristics of wireless facility attachments that would distinguish one type of pole attachment from another and make establishment of uniform rules and procedures impractical.
5. State whether AT&T Kentucky currently permits cable television system operators and telecommunication carriers to place wireline attachments on its utility poles. If yes, provide a copy of the agreements that AT&T Kentucky currently has with those entities regarding such attachments and a copy of AT&T Kentucky's internal procedures, standards and rules that govern such placement.
6. State whether AT&T Kentucky currently permits telecommunication carriers to attach wireless facilities to its utility poles. If yes, provide a copy of each agreement that AT&T Kentucky currently has with those entities regarding such attachments and a copy of AT&T Kentucky's internal procedures, standards and rules that govern such attachments.
7. State whether, in light of the revisions to KRS 278.541-.544, AT&T Kentucky's provision of pole attachment services is still regulated by the Kentucky Public Service Commission. If it is not, identify the statute(s) and regulation(s) that govern AT&T Kentucky's provision of such services. If it is, explain the applicability of KRS 278.160 and KRS 278.170 to the provision of such services.
8. State whether AT&T Kentucky has ever denied access to its poles in Kentucky for a wireline attachment. For each instance in which access was denied, state whether AT&T Kentucky sought authorization from the Kentucky Public Service Commission prior to such denial.
9. State whether AT&T Kentucky has ever denied access to its poles in Kentucky for a wireless facility attachment. For each instance in which access was denied, state the basis for such denial.

10. Identify those states in which AT&T operates that regulate the rates, terms, and conditions of service for utility pole attachments and that require a pole owner to obtain regulatory or judicial authorization before denying access to its poles for a pole attachment.
11. List the electric utilities that currently permit AT&T Kentucky or AT&T Mobility to self-insure.
12. List the electric utilities that currently do not permit AT&T Kentucky or AT&T Mobility to self-insure.
13. Describe the insurance requirements that AT&T Kentucky imposes upon those persons requesting to attach wireline or wireless facilities to its utility poles.
14. Does AT&T Kentucky object to the requirement that all facilities that it attaches to KU's poles must be tagged at the time of placement or within 180 days of the proposed effective date of the PSA Rate Schedule? If yes, explain why.
15. AT&T of Kentucky's Motion for Intervention states the motion was made "on behalf of itself and affiliated entities." Motion, p. 1. Identify each and every subsidiary or affiliate of AT&T that AT&T of Kentucky represents in this proceeding.
16. AT&T of Kentucky's motion for intervention references the fact that BellSouth Telecommunications, LLC does business as AT&T of Kentucky. Please describe the commercial relationships for pole attachment space or services between LG&E or KU and BellSouth of Kentucky, LLC d/b/a AT&T of Kentucky.
17. State whether AT&T Kentucky uses the same cable to support AT&T Kentucky's local exchange carrier operations and AT&T Mobility's wireless operations. Explain.
18. State whether AT&T Kentucky or any of AT&T Kentucky's affiliates have installed wirelines to KU's poles or structures solely to support the wireless operations of AT&T Mobility and any other AT&T Kentucky affiliate. If yes, state the number of attachments and the amount of wireline (in miles) that has been installed solely to support these operations.
19. State whether AT&T Kentucky has attached facilities to KU poles in areas in which AT&T Kentucky is not the incumbent local exchange carrier. If yes,
 - a. State the approximate number of attachments and amount of wireline (in miles) that AT&T Kentucky has install in these areas.
 - b. Provide the attachment agreement(s) under which these attachments were made.

- c. State whether AT&T Kentucky obtained permits to make these attachments.
20. State the average height of AT&T Kentucky and affiliates' small-cell antennas.
21. Describe AT&T Kentucky's current policy regarding performing pole loading analysis when attaching facilities to LG&E/KU owned poles.
22. Describe AT&T Kentucky's current policy regarding the performance of pole loading studies for attachments to its own poles.
23. State whether there have been any incidents in which KU denied access to pole space to AT&T and did not offer to replace the utility pole in question or permit the rearrangement of facilities to accommodate the proposed attachment. If yes, describe each incident and provide the date of occurrence.

LG&E:

1. State whether Mr. Peters was aware of the PSC Staff Opinion Nos. 2014-014 and 2016-012 when preparing his testimony.
2. Regarding PSC Staff Opinion Nos. 2014-014 and 2016-012, state for each whether Mr. Peters agrees with the PSC Staff analysis. If not, explain why not.
3. State whether Mr. Peters agrees the Kentucky Public Service Commission has elected to regulate the rates, terms, and conditions of service for utility pole attachments of telephone service providers and that the Federal Communication Commission's rules regarding such attachments are not applicable to the rates and conditions of such service.
4. Describe the unique characteristics of wireless facility attachments that would distinguish one type of pole attachment from another and make establishment of uniform rules and procedures impractical.
5. State whether AT&T Kentucky currently permits cable television system operators and telecommunication carriers to place wireline attachments to its utility poles. If yes, provide a copy of the agreements regarding such attachments that AT&T Kentucky currently has with those entities and a copy of AT&T Kentucky's internal procedures, standards and rules that govern such placement.
6. State whether AT&T Kentucky currently permits telecommunication carriers to attach wireless facilities to its utility poles. If yes, provide a copy of the agreements regarding such attachments that AT&T Kentucky currently has with those entities and a copy of AT&T Kentucky's internal procedures, standards and rules that govern such placement. If no, explain why not.
7. State whether, in light of the revisions to KRS 278.541-.544, AT&T Kentucky's provision of pole attachment services is still regulated by the Kentucky Public

Service Commission. If it is not, identify the statutes and regulations that govern AT&T Kentucky's provision of such services. If it is, explain the applicability of KRS 278.160 and KRS 278.170 to the provision of such services.

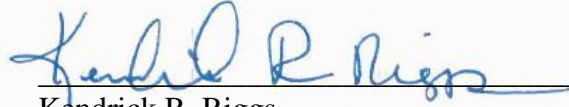
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9. State whether AT&T Kentucky has ever denied access to its poles in Kentucky for a wireless facility attachment. For each instance in which access was denied, state the basis for such denial.
10. Identify those states in which AT&T operates that regulate the rates, terms, and conditions of service for utility pole attachments and that require a pole owner to obtain regulatory or judicial authorization before denying access to its pole for a pole attachment.
11. List the electric utilities that currently permit AT&T Kentucky or AT&T Mobility to self-insure.
12. List the electric utilities that currently do not permit AT&T Kentucky or AT&T Mobility to self-insure.
13. Describe the insurance requirements that AT&T Kentucky imposes upon those persons requesting to attach wireline or wireless facilities to its utility poles.
14. Does AT&T Kentucky object to the requirement that all facilities that it attaches to LG&E's poles must be tagged at the time of placement or within 180 days of the proposed effective date of the PSA Rate Schedule? If yes, explain why.
15. AT&T of Kentucky's Motion for Intervention states the motion was made "on behalf of itself and affiliated entities." Motion, p. 1. Identify each and every subsidiary or affiliate of AT&T that AT&T of Kentucky represents in this proceeding.
16. AT&T of Kentucky's motion for intervention references the fact that BellSouth Telecommunications, LLC does business as AT&T of Kentucky. Please describe the commercial relationships for pole attachment space or services between LG&E or KU and BellSouth of Kentucky, LLC d/b/a AT&T of Kentucky.
17. State whether AT&T Kentucky uses the same cable to support AT&T Kentucky's local exchange carrier operations and AT&T Mobility's wireless operations. Explain.
18. State whether AT&T Kentucky or any AT&T Kentucky affiliates have installed wirelines to LG&E's poles or structures solely to support the wireless operations of AT&T Mobility or any other AT&T Kentucky affiliate providing wireless

service. If yes, state the number of attachments and the amount of wireline (in miles) that has been installed solely to support these operations.

19. State the average height of AT&T Kentucky and affiliates' small-cell antennas.
20. Describe AT&T Kentucky's current policy regarding performing pole loading analysis when attaching facilities to LG&E/KU owned poles.
21. Describe AT&T Kentucky's current policy regarding the performance of pole loading studies for attachments to its own poles.
22. State whether there have been any incidents in which LG&E denied access to pole space to AT&T and did not offer to replace the utility pole in question or permit the rearrangement of facilities to accommodate the proposed attachment. If yes, describe each incident and provide the date of occurrence.

Dated: March 17, 2017

Respectfully submitted,

A handwritten signature in blue ink, reading "Kendrick R. Riggs", is written over a horizontal line.


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*Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company*

CERTIFICATE OF COMPLIANCE

This is to certify that Kentucky Utilities Company's and Louisville Gas and Electric Company's March 17, 2017 electronic filing of the Data Requests is a true and accurate copy of the same document being filed in paper medium; that the electronic filing has been transmitted to the Commission on March 17, 2017; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original and six copies, in paper medium of the Data Requests, are being mailed by U.S. First Class Mail, postage prepaid, to the Commission on March 17, 2017.



*Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company*