

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

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)
POWER COMPANY FOR (1) A GENERAL)
ADJUSTMENT OF ITS RATES FOR ELECTRIC)
SERVICE; (2) AN ORDER APPROVING ITS)
2017 ENVIRONMENTAL COMPLIANCE PLAN;)
(3) AN ORDER APPROVING ITS TARIFFS AND)
RIDERS; (4) AN ORDER APPROVING)
ACCOUNTING PRACTICES TO ESTABLISH)
REGULATORY ASSETS AND LIABILITIES;)
AND (5) AN ORDER GRANTING ALL OTHER)
REQUIRED APPROVALS AND RELIEF)

Case No.
2017-00179

**KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION'S
SUPPLEMENTAL DATA REQUESTS TO KENTUCKY POWER COMPANY**

The Kentucky Cable Telecommunications Association, pursuant to the Commission's July 17, 2017 Order setting forth the procedural schedule in this case, hereby submits its Supplemental Data Request to Kentucky Power Company ("KPCO"), in accordance with the following Definitions and Instructions.

DEFINITIONS

1. The terms "you," "your," and "the Company" refer to Kentucky Power 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 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.

DATA REQUESTS

KCTA_2_001 Please provide a copy of the calculations used to derive the current CATV pole attachment charges of \$7.21 for attachments on a two-user pole and \$4.47 for attachments on a three-user pole.

KCTA_2_002 Referring to KPCO Exhibit E, Pages 112-116, Tariff C.A.T.V Issued June 28, 2017, please provide a copy of the corresponding superseded tariff pages.

KCTA_2_003 To the extent not otherwise clearly identified in your response to 2_002 above, identify any and all changes in tariff language included in the June 28, 2017 Tariff vis-à-vis the corresponding superseded tariff pages.

KCTA_2_004 Please provide a copy of any narrative or Q. and A. testimony included in KPCO's rate case package on the subject of pole attachment charges, along with any supporting exhibits not otherwise provided in response to KCTA data requests.

KCTA_2_005 To the extent different from that authorized by the Commission in Final Order Case No. 2014-00396, identify the rate of return that KPCO is proposing in connection with this rate case corresponding to the currently authorized rate of return of 7.34% used by KPCO in the calculation of the CATV Attachment Fees as provided in KPCO_R_KCTA_1_3_Attachment1.xlsx and KPCO_R_KCTA_1_4_Attachment1.xlsx.

KCTA_2_006 Please provide copies of any studies or documentation in support of the annual depreciation rate for poles used by KPCO in the calculation of the CATV Attachment Fees as provided in KPCO_R_KCTA_1_3_Attachment1.xlsx and KPCO_R_KCTA_1_4_Attachment1.xlsx.

KCTA_2_007 To the extent different from that authorized by the Commission in Final Order Case No. 2014-00396, identify the annual depreciation rate for poles that KPCO is proposing in connection with this rate case corresponding to the currently authorized annual rate of 3.52% used by KPCO in the calculation of the CATV Attachment Fees as provided in KPCO_R_KCTA_1_3_Attachment1.xlsx and KPCO_R_KCTA_1_4_Attachment1.xlsx.

KCTA_2_008 To the extent KPCO has proposed a depreciation rate for poles different from that authorized by the Commission in Final Order Case No. 2014-00396, provide copies of any studies or documentation in support of the new depreciation rate.

KCTA_2_009 Identify the plant specific average service life for pole plant investment booked to Account 364.

KCTA_2_010 Provide detail subaccount totals for Account 593 for years 2015 and 2016.

KCTA_2_011 Please provide the information requested in the previous request (KCTA_2_0010) for each of the preceding five years 2010 – 2014.

KCTA_2_012 Provide the underlying general ledger accounting data in native electronic format to support the subaccount summary detail data provided in your response to KCTA_2_0010 for years 2015 and 2016.

KCTA_2_013 To the extent not otherwise clearly identified in the subaccount summary detail or the general ledger data for Account 593 provided in response to requests 2_0010 and 2_012, identify all expenses booked to Account 593 for years 2015 and 2016 that are associated with a regulatory asset, including but not limited to the Storm Related Costs of \$4,377,336 and \$ 10,931,400 identified in KYPO's 2016 FERC Form 1 at Pages 123.26 and 232.

KCTA_2_014 To the extent not otherwise clearly identified in the subaccount summary detail or the general ledger data for Account 593 provided in response to requests 2_0010 and 2_012, identify each and every credit item (i.e., reversal of expenses) associated with a regulatory asset for years 2015 and 2016, including, but not limited to the Storm Related Costs identified in KYPO's 2016 FERC Form 1 at Pages 123.26 and 232.

KCTA_2_015 Please provide a detailed narrative explanation of the manner in which KPCO has accounted for the Storm Related Costs identified in request 2_013

relating to KPCO Account 593 maintenance expense and how that accounting has impacted KYPO's pole attachment rate calculations for 2015 and 2016.

KCTA_2_016 Please provide copies of Final Order Case No. 2014-00396 and Final Order Case No. 2016-00180 pertaining to Storm Related Costs relating to KPCO Account 593 maintenance expense.

KCTA_2_017 Provide the following information regarding the number of poles in KPCO Account 364 as of the twelve months ending December 31, 2015 and December 31, 2016: (a) total number of KPCO poles; (b) total number of 35 foot poles; (c) total number of 40 feet poles; and (d) total number of 45 feet poles.

KCTA_2_018. Please provide the information requested in the previous request (KCTA_2_017) for each of the preceding five years 2010 – 2014.

KCTA_2_019 Please provide the following information regarding gross pole investment in KPCO Account 364 as of the twelve months ending December 31, 2015 and December 31, 2016: (a) total gross pole investment in 35 feet poles; (b) total gross pole investment in 40 feet poles; and (c) total gross pole investment in 45 feet poles.

KCTA_2_020 Please provide the following information regarding depreciation reserve for KPCO Account 364 as of the twelve months ending December 31, 2015 and December 31, 2016: (a) depreciation reserve related to the gross investment in 35 feet

poles; (b) depreciation reserve related to the gross investment in 40 feet poles; and (c) depreciation reserve related to the gross investment in 45 feet poles.

KCTA_2_021 Provide continuing property records from KPCO Account 364 as of the twelve months ending December 31, 2015 and December 31, 2016, showing detailed breakdown of pole plant investment according to class of pole (i.e., height, material), vintage, quantity, and cost.

KCTA_2_022 Please provide the following information regarding the number of cable attachments on KPCO poles as of the twelve months ending December 31, 2015 and December 31, 2016: (a) total number of cable attachments; (b) total number of cable attachments on a two-user pole as described in Administrative Order 251; (c) total number of cable attachments on a three-user pole as described in Administrative Order 251.

KCTA_2_023 Please provide the following information regarding pole attachment revenues for 2015 and 2016: (a) total dollars of pole attachment revenues; (b) pole attachment revenues associated with a two-user pole as described in Administrative Order 251; and (c) pole attachment revenues associated with a three-user pole as described in Administrative Order 251.

KCTA_2_024 Please provide the information requested in the previous request (KCTA_2_023) for each of the preceding five years 2010 – 2014.

KCTA_2_025 Identify the amount of makeready and other non-recurring charges paid to KPCO by cable operators in addition to the pole attachment revenues identified in response to 2_023 and 2_024 for the years 2010 to 2016.

Respectfully submitted,

By /s/ Laurence J. Zielke

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**ATTORNEYS FOR THE KENTUCKY
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing Kentucky Cable Telecommunications Association's Motion to Intervene has been served on all parties of record electronically on this the 8th day of September 2017.

/s/ Janice M. Theriot
Janice M. Theriot