

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

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR (1) A GENERAL)	Case No.
ADJUSTMENT OF ITS RATES FOR ELECTRIC)	2017-00179
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)	

**KENTUCKY CABLE TELECOMMUNICATIONS ASSOCIATION'S
FIRST 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 first 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

1. Identify by name and business address each individual who assisted in preparing the pole attachment portions of the Exhibits to the application.
2. Provide a copy of the last Annual Report.
3. Provide all calculations made by KPCO in deriving its proposed pole attachment, grounding attachment, and anchor rates under its latest filings, and provide back-up information for each investment, costs and expense number used in your calculation. Tie all such back-up information

to KPCO's books (including the relevant FERC Account each such data point is tied to) and provide copies of all such record.

4. Justify your current pole rates under the Commission's pole rate methodology as set forth in PSC Administrative Case No. 251. Please provide all calculations and source data for the test year and the 12-month period immediately preceding the test year.

5. Provide the gross investment in KPCO poles.

6. Provide the total number of KPCO poles.

7. Provide the depreciation reserve related to the gross investment in poles.

8. Provide all data and supporting documentation of any survey or audit you, or a third party acting on your behalf, as conducted regarding the number of poles you own for the test year and the 12-month period immediately preceding the test year.

9. Provide the number of two-user poles, as described in Administrative Order 251, with attachments.

10. Provide the number of three-user poles, as described in Administrative Order 251, with attachments.

11. Provide the effective tax rate for KPCO. Provide all data – including but not limited to data on deductions, exclusions, and credits – necessary to derive an effective tax rate.

12. Provide the amount that an average KPCO residential customer's monthly electric bill would change from the amount forecasted by the Company for the test year if the Commission were to reduce KPCO's current annual pole attachment rates by \$1, \$2, \$3, or \$4 and the amount of that reduction were to be recovered from electric ratepayers. In making these calculations, assume that the Company's revenue requirement, as proposed by the Company, is unchanged. Also assume that the pole attachment fee reductions are to be recovered from residential users in the

same percentage that the Company's revenues are proposed to be recovered from residential customers.

13. Making the same assumptions as requested in 12, if the Commission were to reduce KPCO's current annual pole attachment rates by \$1, \$2, \$3, or \$4, what effect would it have on KPCO's overall rate of return?

Respectfully submitted,

By /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 forgoing Kentucky Cable Telecommunications Association's Motion to Intervene has been served on all parties of record electronically on this the 14th day of August 2017.

/s/ Janice M. Theriot
Janice M. Theriot