

Exhibits to Direct Testimony

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Patricia D. Kravtin

500 Atlantic Avenue, Unit 19A
Boston, MA 02210
pdkravtin@comcast.net

Summary

Consulting economist with specialization in telecommunications, cable, and energy markets. Extensive knowledge of complex economic, policy and technical issues facing incumbents, new entrants, regulators, investors, and consumers in rapidly changing telecommunications, cable, and energy markets.

Experience

CONSULTING ECONOMIST

2000–Present Independent Consulting Swampscott, MA

- Providing expert witness services and full range of economic, policy, and technical advisory services in the fields of telecommunications, cable, and energy.

SENIOR VICE PRESIDENT/SENIOR ECONOMIST

1982–2000 Economics and Technology, Inc. Boston, MA

- Active participant in regulatory proceedings in over thirty state jurisdictions, before the Federal Communications Commission, Federal Energy Regulatory Commission, Canadian Radio-Television and Telecommunications Commission, Ontario Energy Board, and other international regulatory authorities on telecommunications, cable, and energy matters.
- Provided expert witness and technical advisory services in connection with litigation and arbitration proceedings before state and federal regulatory agencies, and before U.S. district court, on behalf of diverse set of public and private sector clients (see Record of Prior Testimony).
- Extensive cable television regulation expertise in connection with implementation of the Cable Act of 1992 and the Telecommunications Act of 1996 by the Federal Communications Commission and local franchising authorities.
- Led analysis of wide range of issues related to: rates and rate policies; cost methodologies and allocations; productivity; cost benchmarking; business case studies for entry into cable, telephony, and broadband markets; development of competition; electric industry restructuring; incentive or performance based regulation; universal service; access charges; deployment of advanced services and broadband technologies; access to pole attachments, conduit, and other rights-of-way.
- Served as advisor to state regulatory agencies, assisting in negotiations with utilities, non-partial review of record evidence, deliberations and drafting of final decisions.

- Author of industry reports and papers on topics including market structure, competition, alternative forms of regulation, patterns of investment, telecommunications modernization, and broadband deployment.
- Invited speaker before various national organizations, state legislative committees and participant in industry symposiums.
- Grant Reviewer for the Broadband Technology Opportunities Program (BTOP) administered by National Telecommunications and Information Administration (NTIA), Fall 2009.

RESEARCH/POLICY ANALYST

1978–1980 Various Federal Agencies, Washington, DC

- Prepared economic impact analyses concerning allocation of frequency spectrum (Federal Communications Commission).
- Performed financial and statistical analysis concerning the effect of securities regulations on the acquisition of high-technology firms (Securities and Exchange Commission).
- Prepared analyses and recommendations on national economic policy issues including capital recovery. (U.S. Dept. of Commerce).

Education

1980–1982 Massachusetts Institute of Technology, Boston, MA

- Graduate Study in the Ph.D. program in Economics (Abd). General Examinations passed in fields of Government Regulation of Industry, Industrial Organization, and Urban and Regional Economics.
- National Science Foundation Fellow.

1976–1980 George Washington University, Washington, DC

- B.A. with Distinction in Economics.
- Phi Beta Kappa, Omicron Delta Epsilon in recognition of high scholastic achievement in field of Economics. Recipient of four-year honor scholarship.

Prof. Affiliation

American Economic Association

Reports and Studies (authored and co-authored)

Report on the Ohio Municipal Electric Association Pole Attachment Rate Study, prepared for the Ohio Cable Telecommunications Association, November 9, 2012.

Report on the Financial Viability of the Proposed Greenfield Overbuild in the City of Lincoln, California, prepared for Starstream Communications, August 12, 2003.

“Assessing SBC/Pacific’s Progress in Eliminating Barriers to Entry, The Local Market in California is Not Yet ‘Fully and Irreversibly Open,’” prepared for CALTEL, August 2000.

“Final Report on the Qualifications of Wide Open West-Texas, LLC For a Cable Television Franchise in the City of Dallas,” prepared for the City of Dallas, July 31, 2000.

“Final Report on the Qualifications of Western Integrated Networks of Texas Operating L.P. For a Cable Television Franchise in the City of Dallas,” prepared for the City of Dallas, July 31, 2000.

“Price Cap Plan for USWC: Establishing Appropriate Price and Service Quality Incentives in Utah” prepared for The Division of Public Utilities, March, 2000.

“Building a Broadband America: The Competitive Keys to the Future of the Internet,” prepared for The Competitive Broadband Coalition, May 1999.

“Broken Promises: A Review of Bell Atlantic-Pennsylvania's Performance Under Chapter 30,” prepared for AT&T and MCI Telecommunications, June 1998.

“Analysis of Opportunities for Cross Subsidies Between GTA and GTA Cellular,” prepared for Guam Cellular and Paging, submitted to the Guam Public Utilities Commission, July 11, 1997.

“Reply to Incumbent LEC Claims to Special Revenue Recovery Mechanisms,” submitted in the Matter of Access Charge Reform in CC Docket 96-262, February 14, 1997.

“Assessing Incumbent LEC Claims to Special Revenue Recovery Mechanisms: Revenue opportunities, market assessments, and further empirical analysis of the ‘Gap’ between embedded and forward-looking costs,” FCC CC Docket 96-262, January 29, 1997.

“Analysis of Incumbent LEC Embedded Investment: An Empirical Perspective on the ‘Gap’ between Historical Costs and Forward-looking TSLRIC,” Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, FCC CC 96-98, May 30, 1996.

“Reply to X-Factor Proposals for the FCC Long-Term LEC Price Cap Plan,” prepared for the Ad Hoc Telecommunications User Committee, submitted in FCC CC Docket 94-1, March 1, 1996.

“Establishing the X-Factor for the FCC Long-Term LEC Price Cap Plan,” prepared for the Ad Hoc Telecommunications User Committee, submitted in FCC CC Docket 94-1, December 1995.

“The Economic Viability of Stentor's ‘Beacon Initiative,’ Exploring the Extent of its Financial Dependency upon Revenues from Services in the Utility Segment,” prepared for Unitel, submitted before the Canadian Radio-television and Telecommunications Commission, March 1995.

“Fostering a Competitive Local Exchange Market in New Jersey: Blueprint for Development of a Fair Playing Field,” prepared for the New Jersey Cable Television Association, January 1995.

“The Enduring Local Bottleneck: Monopoly Power and the Local Exchange Carriers,” Feb. 1994.

“A Note on Facilitating Local Exchange Competition,” prepared for E.P.G., Nov. 1991.

“Testing for Effective Competition in the Local Exchange,” prepared for the E.P.G., October 1991.

“A Public Good/Private Good Framework for Identifying POTS Objectives for the Public Switched Network” prepared for the National Regulatory Research Institute, October 1991.

“Report on the Status of Telecommunications Regulation, Legislation, and modernization in the states of Arkansas, Kansas, Missouri, Nebraska, Oklahoma and Texas,” prepared for the Mid-America Cable-TV Association, December 13, 1990.

“The U S Telecommunications Infrastructure and Economic Development,” presented at the 18th Annual Telecommunications Policy Research Conference, Airlie, Virginia, October 1990.

“An Analysis of Outside Plant Provisioning and Utilization Practices of US West Communications in the State of Washington,” prepared for the Washington Utilities and Transportation Commission, March 1990.

“Sustainability of Competition in Light of New Technologies,” presented at the Twentieth Annual Williamsburg Conference of the Institute of Public Utilities, Williamsburg, VA, December 1988.

“Telecommunications Modernization: Who Pays?,” prepared for the National Regulatory Research Institute, September 1988.

“Industry Structure and Competition in Telecommunications Markets: An Empirical Analysis,” presented at the Seventh International Conference of the International Telecommunications Society at MIT, July 1988.

“Market Structure and Competition in the Michigan Telecommunications Industry,” prepared for the Michigan Divestiture Research Fund Board, April 1988.

“Impact of Interstate Switched Access Charges on Information Service Providers - Analysis of Initial Comments,” submitted in FCC CC Docket No. 87-215, October 26, 1987.

“An Economic Analysis of the Impact of Interstate Switched Access Charge Treatment on Information Service Providers,” submitted in FCC CC Docket No. 87-215, September 24, 1987.

“Regulation and Technological Change: Assessment of the Nature and Extent of Competition from a Natural Industry Structure Perspective and Implications for Regulatory Policy Options,” prepared for the State of New York in collaboration with the City of New York, February 1987.

“BOC Market Power and MFJ Restrictions: A Critical Analysis of the ‘Competitive Market’ Assumption,” submitted to the Department of Justice, July 1986.

“Long-Run Regulation of AT&T: A Key Element of a Competitive Telecommunications Policy,” *Telematics*, August 1984.

“Economic and Policy Considerations Supporting Continued Regulation of AT&T,” submitted in FCC CC Docket No. 83-1147, June 1984.

“Multi-product Transportation Cost Functions,” MIT Working Paper, September 1982.

Record of Prior Testimony

2017

Before the **North Carolina Public Utility Commission**, in *Re: In the Matter of Time Warner Cable Southeast LLC, Complainant v. Carteret-Craven Electric Membership Corporation, Respondent*, Docket No. EC-55, SUB 70, Direct Pre-filed May 30, 2017; Rebuttal Pre-filed June 15, 2017; Cross-examination June 20, 2017.

Before the **North Carolina Public Utility Commission**, in *Re: In the Matter of Time Warner Cable Southeast LLC, Complainant v. Jones-Onslow Electric Membership Corporation, Respondent*, Docket No. EC-43, SUB 88, Direct Pre-filed May 30, 2017; Rebuttal Pre-filed June 15, 2017; Cross-examination June 20, 2017.

Before the **North Carolina Public Utility Commission**, in *Re: In the Matter of Time Warner Cable Southeast LLC, Complainant v. Surry-Yadkin Electric Membership Corporation, Respondent*, Docket No. EC-49, SUB 55, Direct Pre-filed May 30, 2017; Rebuttal Pre-filed June 15, 2017; Cross-examination June 20, 2017.

Before the **North Carolina Public Utility Commission**, in *Re: In the Matter of Union Electric Membership Corporation, Complainant v. Time Warner Cable Southeast LLC, Respondent*, Docket No. EC-39, SUB 44, Responsive Pre-filed June 15, 2017; Cross-examination June 20, 2017.

2016

Before the **State Of Connecticut Department Of Public Utility Control**, in *Re: In the Matter of the Application of The United Illuminating Company to Increase Its Rates and Charges*, Docket No. 16-06-04, filed September 9, 2016.

Before the **United States District Court, District of Maryland**, *Zayo Group, LLC, et al., Plaintiffs v. Mayor and City of Council of Baltimore, et al., Defendants*, Civil No. 16-cv-592, Declaration filed March 30, 2016; Cross-examination May 17, 2016.

2015

Before the **Arkansas Public Service Commission**, *In the Matter of a Rulemaking Proceeding to Consider Changes to the Arkansas Public Service Commission's Pole Attachment Rules*, Docket No. 15-019-R, Report filed July 22, 2015, Second Report filed August 19, 2015; Cross-examination October 27, 2015.

Before the **Public Service Commission of Wisconsin**, *Wisconsin Cable Communications Association, Charter Cable Partners, LLC, and Time Warner Cable Midwest LLC, Complainants, v. City of Oconomowoc, Respondent*, Docket No. 4340-EI-100, Direct Testimony submitted May 29, 2015; Rebuttal Testimony submitted June 19, 2015; Surrebuttal Testimony submitted July 2, 2015; Cross-examination July 9, 2015.

Before the **Kentucky Public Service Commission**, *In the Matter of: Application of Kentucky Utilities Company for An Adjustment of its Base Rates*, Case No. 2014-00371, submitted March 6, 2015.

Before the **Kentucky Public Service Commission** *In the Matter of: Application of Louisville Gas and Electric Company for An Adjustment of its Electric and Gas Base Rates*, Case No. 2014-00372, submitted March 6, 2015.

2013

Before the **Commonwealth of Virginia State Corporation Commission**, in *Application of Northern Virginia Electric Cooperative, For Approval of pole attachment rates and terms and conditions under § 56-466.1 of the Code of Virginia*, Pre-filed Direct Testimony on behalf of Comcast California/Maryland/Pennsylvania/Virginia/West Virginia LLC, August 29, 2013. Live testimony and cross-examination, November 22/25, 2013.

Before the **General Court of Justice Superior Court Division, State of North Carolina, County of Rutherford**, *Rutherford Electric Membership Corporation, Plaintiff, vs. Time Warner Entertainment– Advance/Newhouse*

Partnership d/b/a Time Warner Cable, Defendant, 13 CVS 231, submitted July 10, 2013, Deposition July 22, 2013. Live testimony and cross-examination, September 6, 2013.

Before the **Chancery Court for Davidson County, Tennessee at Nashville**, *The Metropolitan Government of Nashville and Davidson County, Tennessee, Plaintiff v. XO Tennessee, Inc., Defendant*, Docket No. 02-679-IV; *The Metropolitan Government of Nashville and Davidson County, Tennessee, Plaintiff v. TCG Midsouth, Inc., Defendant*, Docket No. 02-749-IV, Affidavit dated January 25, 2013, Reply Affidavit dated February 19, 2013. Live testimony and cross-examination, May 14-15, 2013.

2012

Before the **State of New Hampshire Public Utilities Commission**, in *Time Warner Entertainment Company L.P. d/b/a Time Warner Cable, Petition for Resolution of Dispute with Public Service Company of New Hampshire*, DT 12-084, on behalf of Time Warner Entertainment Company L.P. d/b/a Time Warner Cable, Comcast Cable Communications Management, LLC, Comcast of New Hampshire, Inc., Comcast of Massachusetts/New Hampshire, LLC, and Comcast of Maine/New Hampshire, Inc. Initial Direct Testimony submitted July 20, 2012; Reply Direct Testimony submitted October 31, 2012; Live panel testimony, November 14, 2012.

Before the **Ontario Energy Board**, *In the Matter of the Application by Canadian Distributed Antenna Systems Coalition ("CANDAS")*, File No. EB-2011-1020, Joint Written Statement (with J. Lemay, M. Starkey, A. Yatchew), submitted July 20, 2012.

Before the **Chancery Court for Davidson County, Tennessee at Nashville**, *The Metropolitan Government of Nashville and Davidson County, Tennessee, Plaintiff v. XO Tennessee, Inc., Defendant*, Docket No. 02-679-IV; *The Metropolitan Government of Nashville and Davidson County, Tennessee, Plaintiff v. TCG Midsouth, Inc., Defendant*, Docket No. 02-749-IV, Expert Report submitted May 15, 2012; Supplemental Report dated November 6, 2012.

2011

Before the **Ontario Energy Board**, *in the Matter of the Application by Canadian Distributed Antenna Systems Coalition ("CANDAS")*, File No. EB-2011-1020, Reply Evidence, filed December 16, 2011.

Before the **Public Utilities Commission of Ohio**, *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger is Approved, as a Merged Company (collectively, AEP Ohio) for an Increase in Electric Distribution Rates*, Case No. 11-351-EL-AIR, Case No. 11-352-EL-AIR; *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger is Approved, as a Merged Company (collectively, AEP Ohio) for Tariff Approval*, Case No. 11-353-EL-ATA Case No. 11-354-EL-ATA; *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger is Approved, as a Merged Company (collectively, AEP Ohio) for Approval to Change Accounting Methods*, Case No. 11-356-EL-AAM, Case No. 11-258-EL-AAM. filed October 24, 2011.

Before the **Virginia State Corporation Commission**, *In the Matter of Determining Appropriate Regulation of Pole Attachments and Cost Sharing in Virginia*, Case No. PUE-2011-00033, Affidavit submitted June 22, 2011, Live Testimony given July 13, 2011.

Before the **Public Utility Commission of Texas**, State Office of Administrative Hearings, *Petition of CPS Energy for Enforcement Against AT&T Texas and Time Warner Cable Regarding Pole Attachments*, SOAH Docket No. 473-09-5470, PUC Docket No. 36633, Supplemental Testimony submitted March 17, 2011; Further Supplemental Testimony submitted April 22, 2011, Cross-examination, September 13, 2011.

2010

Before the **General Court of Justice Superior Court Division, State of North Carolina, County of Rowan**, *Time Warner Entertainment– Advance/Newhouse Partnership, Plaintiff, V. Town Of Landis, North Carolina, Defendant*, 10 CVS 1172, submitted October 20, 2010, Deposition December 1, 2010, Live testimony and cross-examination July 20, 2011.

Before the **Federal Communications Commission**, *In the Matter of Implementation of Section 224 of the Act; Amendment of the Commission's Rules and Policies Governing Pole Attachments*, WC Docket No. 07-245, GN Docket No. 09-51. Report submitted August 16, 2010, Attachment A to Comments filed by the National Cable and Telecommunications Association.

Before the **Public Utility Commission of Texas**, State Office of Administrative Hearings, *Petition of CPS Energy for Enforcement Against AT&T Texas and Time Warner Cable Regarding Pole Attachments*, SOAH Docket No. 473-09-5470, PUC Docket No. 36633, Direct Testimony submitted July 23, 2010.

Before the **Kentucky Public Service Commission**, *In the Matter of: Application of Kentucky Utilities Company for An Adjustment of its Base Rates*, Case No. 2009-00548, submitted April 22, 2010.

Before the **Kentucky Public Service Commission** *In the Matter of: Application of Louisville Gas and Electric Company for An Adjustment of its Electric and Gas Base Rates*, Case No. 2009-00549, submitted April 22, 2010.

Before the **Arkansas Public Service Commission**, *Coxcom, Inc., D/B/A Cox Communications, Complainant V. Arkansas Valley Electric Cooperative Corporation, Respondent*. Docket No. 09-133-C, submitted March 17, 2010.

2009

Before the Circuit Court of the Thirteenth Judicial Circuit in and for Hillsborough County, State of Florida, Tampa Electric Company, Plaintiff, vs. Bright House Networks, LLC, Defendant, Case No. 06-00819, Division L. Expert Report submitted December 30, 2009, Deposition February 2, 2010, Live testimony and cross-examination, March 24, 2010.

Before the **Superior Court of the State Of Washington for the County of Pacific**, *Pacific Utility District No. 2 Of Pacific County, Plaintiff, V. Comcast of Washington Iv, Inc., Centurytel of Washington, Inc., and Falcon Community Ventures I, L.P. D/B/A Charter Communications, Defendants*, Case No. 07-2-00484-1, Expert Report submitted September 18, 2009, Reply Report submitted October 16, 2009, Deposition December 21, 2009, Deposition December 21, 2009, Live testimony and cross-examination October 12-13, 2010.

Before the **Public Utilities Commission of Ohio**, *In the Matter of the Application of Duke Energy Ohio, Inc., for an Increase in Electric Distribution Rates, Case No. 08-709-EL-AIR, In the Matter of the Application of Duke Energy Ohio, Inc., for a Tariff Approval, Case No. 08-710-EL-ATA, In the Matter of the Application of Duke Energy Ohio, Inc., for Approval to Change Accounting Methods, Case No. 08-11-EL-AAM, In the Matter of the Application of Cincinnati Gas & Electric Company for Approval of its Rider BDP, Backup Delivery Point, Case No. 06-718-EL-ATA*, filed February 26, 2009.

2008

Before the **Arkansas Public Service Commission**, *In the Matter of a Rulemaking Proceeding to Establish Pole Attachment Rules In Accordance With Act 740 of 2007*, Docket No. 08-073-R, filed May 13, 2008, reply filed June 3, 2008, Cross-examination June 10, 2008.

Before the **Federal Communications Commission**, *In the Matter of Implementation of Section 224 of the Act; Amendment of the Commission's Rules and Policies Governing Pole Attachments*, WC Docket No. 07-245, RM 11293, RM 11303, filed March 7, 2008, reply filed April 22, 2008.

2006

Before the **State of New Jersey Board of Public Utilities**, Office of Administrative Law, *in the Matter of the Verified Petition of TCG Delaware Valley, Inc. and Teleport Communications New York for an Order Requiring PSE&G Co. to Comply with the Board's Conduit Rental Regulations*, OAL Docket PUC 1191-06, BPU Docket No. EO0511005, filed September 29, 2006; rebuttal filed November 17, 2006.

Before the **Federal Communications Commission**, *In the Matter of Florida Cable Telecommunications Association, Inc., Comcast Cablevision of Panama City, Inc.; Mediacom Southeast, L.L.C.; and Cox Communications Gulf, L.L.C.; Complainants v. Gulf Power Company, Respondent*. EB Docket No. 04-381. Testimony on behalf of Complainants, March 31, 2006, Deposition March 15, 2006, Live Cross April 26-27, 2006.

2005

Before the **United States District Court for the Eastern District of New York**, *Coastal Communication Service, Inc. and Telebeam Telecommunications Corporation, Plaintiffs - against -The City of New York and New York City Department of Information Technology and Telecommunications*, 02 Civ. 2300 (RJD) (SMG), Expert Report filed February 4, 2005; Rebuttal Expert Report, filed August 29, 2005, Deposition December 1, 2005.

2004

Before the **Ontario Energy Board**, *In the Matter of the Ontario Energy Board Act 1998*, S.O.1998, c.15, (Schedule B); and *In the Matter of an Application pursuant to section 74 of the Ontario Energy Board Act, 1998* by the Canadian Cable Television Association for an Order or Orders to amend the licenses of electricity distributors, RP-2003-024, Reply Evidence, filed September 27, 2004 (joint w/ Paul Glist), Cross-examination October 26-27, 2004.

2003

Before the **United States District Court for the Southern District of California**, *Level 3 Communications, LLC v. City of Santee*, Civil Action No. 02-CV-1193, Rebuttal Expert Report, filed July 18, 2003.

2002

Before the **New York State Public Service Commission**, *In the Matter of the Cable Television & Telecommunications Association of New York, Inc., Petitioner, v. Verizon New York, Inc., Respondent*, Case 02-M-1636, Affidavit filed December 19, 2002.

Before the **West Virginia Public Service Commission**, *Community Antenna Service, Inc. v. Charter Communications*, Case No. 01-0646-CTV-C, Live Direct Testimony and Cross-examination, June 12, 2002.

Before the **Public Service Commission of the District of Columbia**, *Comcast Cablevision of the District, L.L.C., Complainant, v. Verizon Communications Inc. - Washington, D.C., Respondent*, Formal Case No. 1006, Direct Testimony filed June 11, 2002; Rebuttal Testimony filed June 24, 2002.

Before the **Federal Communications Commission**, in *Cavalier Telephone, LLC, Complainant, v. Virginia Electric & Power Co., D/b/a Dominion Virginia Power, Respondent*, Case No. EB-02-MD-005, Declaration filed May 21, 2002.

Before the **Puerto Rico Telecommunications Regulatory Board**, in *Re: Petition of Centennial Puerto Rico License Corp. for arbitration pursuant to Sections 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Puerto Rico Telephone Company*, on behalf of Centennial Puerto Rico License Corp., Direct Testimony filed April 16, 2002; Deposition May 7, 2002, May 14, 2002; Reply Testimony, May 20, 2002, Cross-examination May 22, 2002.

Before the **Federal Energy Regulatory Commission**, in *Re: In the Matter of Transcontinental Gas Pipe Line Corporation*, Docket No. RP01-245, on behalf of the University of Maryland-College Park, Johns Hopkins University and Johns Hopkins University Health System, and the North Carolina Utilities Commission, Cross-answering Testimony, January 23, 2002; Rebuttal Testimony, May 31, 2002, Cross-examination July 31, 2002.

2001

Before the **United States District Court for the Northern District of New York**, *TC Systems, Inc. and Teleport Communications-New York vs. Town of Colonie, New York*, Civil Action No. 00-CV-1972, Expert Report filed November 16, 2001; Deposition Dec. 7, 2001, Rebuttal Report December 20, 2001, Deposition Jan. 9, 2002.

Before the **Federal Energy Regulatory Commission**, in *Re: In the Matter of Transcontinental Gas Pipe Line Corporation*, Docket No. RP01-245, on behalf of the University of Maryland-College Park, Johns Hopkins University and Johns Hopkins University Health System, and the North Carolina Utilities Commission, filed November 15, 2001.

Before the **Public Service Commission of the District of Columbia**, *Comcast Cable Communications, Inc. d/b/a/Comcast Cable of Washington, D.C., Complainant, v. Verizon Communications Inc. - Washington, D.C., Respondent*, filed September 21, 2001.

Before the **Public Utility Commission of Texas**, State Office of Administrative Hearings, SOAH Docket No. 473-00-1014, PUC Docket No. 22349, *Application of Texas-New Mexico Power Company for Approval of Unbundled Cost of Service Rate Pursuant to PURA § 39.201 and Public Utility Commission Substantive Rule §25.344*, on behalf of Cities Served by Texas-New Mexico Power, filed January 25, 2001.

2000

Before the **Puerto Rico Telecommunications Regulatory Board**, in *AT&T of Puerto Rico, Inc. et al v. Puerto Rico Telephone Company, Inc.*, *Re: Dialing Parity*, Docket Nos. 97-Q-0008, 98-Q-0002, on behalf of Lambda Communications Inc., Cross-examination October 19-20, 2000.

Before the **Department of Telecommunications and Energy of the Commonwealth of Massachusetts**, Docket No. DTE 98-57 – Phase III, *Re: Bell Atlantic- Massachusetts Tariff No. 17 Digital Subscriber Line Compliance Filing and Line Sharing Filing*, (Panel Testimony with Joseph Riolo, Robert Williams, and Michael Clancy) on behalf of Rhythms Links Inc. and Covad Communications Company, filed July 10, 2000.

Before the **New York State Public Service Commission** in *Re: Proceeding on Motion of the Commission to Examine New York Telephone Company's Rates for Unbundled Network Elements* on behalf of the Cable Television & Telecommunications Association of New York, Inc., Direct Testimony filed June 26, 2000, Supplemental Testimony filed November 29, 2000.

Before the **Maryland Public Service Commission**, on behalf of Rhythms Links Inc. and Covad Communications Company, filed jointly with Terry L. Murray and Richard Cabe, May 5, 2000.

Before the **Public Utility Commission of Texas**, in *Re: Proceeding to Examine Reciprocal Compensation Pursuant to Section 252 of the Federal Telecommunications Act of 1996*, CC Docket No. 21982, on behalf of AT&T Communications of Texas, L.P., TCG Dallas, and Teleport Communications Houston, Inc., filed March 31, 2000.

Before the **Federal Communications Commission**, in *Re: In the Matter of Price Caps Performance Review for Local Exchange Carriers, Access Charge Reform*, CC Dockets 94-1, 96-262, on behalf of Ad Hoc Telecommunications Users Committee, filed January 24, 2000.

Before the **Federal Energy Regulatory Commission**, in *Re: In the Matter of Northern Border Pipeline Company*, on behalf of the Canadian Association of Petroleum Producers and the Alberta Department of Resource Development, filed January 20, 2000.

1999

Before the **Connecticut Department of Public Utilities**, in *Re: Evaluation and Application to Modify Franchise Agreement by SBC Communications Inc., Southern New England telecommunications Corporation and SNET Personal Vision, Inc.*, Docket No. 99-04-02, on behalf of the Office of Consumer Counsel, filed June 22, 1999; cross-examination July 8, 1999

Before the **Illinois Commerce Commission**, in *Re: Illinois Commerce Commission on its own Motion v. Illinois Bell Telephone Company; et al: Investigation into Non-Cost Based Access Charge Rate Elements in the Intrastate Access Charges of the Incumbent Local Exchange Carriers in Illinois, Illinois Commerce Commission on its own Motion Investigation into Implicit Universal Service Subsidies in Intrastate Access Charges and to Investigate how these Subsidies should be Treated in the Future, Illinois Commerce Commission on its own motion Investigation into the Reasonableness of the LS2 Rate of Illinois Bell Telephone Company*, Docket No. 97-00601, 97-0602, 97-0516, Consolidated, on behalf of City of Chicago, filed January 4, 1999; rebuttal February 17, 1999.

Before the **Puerto Rico Telecommunications Regulatory Board**, in *Re: In the Matter of Arbitration of Interconnection Rates, Terms and Conditions between Centennial Wireless PCS Operations Corp., Lambda Communications Inc., and the Puerto Rico Telephone Company*, behalf of Centennial Wireless PCS Operations Corp. and Lambda Communications Inc., cross-examination February 16, 1999.

1998

Before the **California Public Utilities Commission**, in *Re: In the Matter of the Application of Pacific Bell (U 1001 C), a Corporation, for Authority for Pricing Flexibility and to Increase Prices of Certain Operator Services, to Reduce the Number of Monthly Assistance Call Allowances, and Adjust Prices for Four Centrex Optional Features*, Application No. 98-05-038, on behalf of County of Los Angeles, filed November 17, 1998, cross-examination, December 9, 1998.

Before the **Puerto Rico Telecommunications Regulatory Board**, in *Re: In the Matter of PRTC's Tariff K-2 (Intra-island access charges)*, Docket no. 97-Q-0001, 97-Q-0003, on behalf of Lambda Communications, Inc., filed October 9, 1998, cross-examination October 9, 1998.

Before the **Connecticut Department of Public Utility Control**, in *Re: Application of the Southern New England Telephone Company*, Docket no. 98-04-03, on behalf of the Connecticut Office of Consumer Counsel, filed August 17, 1998, cross-examination February 18, 1999.

Before the **California Public Utilities Commission**, in *Re: Pacific Gas & Electric General Rate Case, A.97-12-020*, on behalf of Office of Rate Payers Advocates CA PUC, filed June 8, 1998.

1997

Before the **South Carolina Public Service Commission**, in *Re: Proceeding to Review BellSouth Telecommunications, Inc.'s Cost for Unbundled Network Elements*, Docket no. 97-374-C, on behalf of the South Carolina Cable Television Association, filed November 17, 1997.

Before the **State Corporation Commission of Kansas**, in *Re: In the Matter of and Investigation to Determine whether the Exemption from Interconnection Granted by 47 U.S.C. 251(f) should be Terminated in the Dighton, Ellis, Wakeeney, and Hill City Exchanges*, Docket No. 98-GIMT-162-MIS, on behalf of Classic Telephone, Inc., filed October 23, 1997.

Before the **Georgia Public Services Commission**, in *Re: Review of Cost Studies, Methodologies, and Cost-Based Rates for Interconnection and Unbundling of BellSouth Telecommunications Services*, Docket No. 7061-U, on behalf of the Cable Television Association of Georgia, filed August 29, 1997, cross-examination September 19, 1997.

Before the **Federal Communications Commission**, in *Re: In the Matter of Price Caps Performance Review for Local Exchange Carriers, Access Charge Reform*, CC Dockets 94-1, 96-262, on behalf of Ad Hoc Telecommunications Users Committee, filed July 11, 1997.

Before the **Federal Communications Commission**, in *Re: In the Matter of Amendment of Rules and Policies Governing Pole Attachments*, CS Docket 97-98, on behalf of NCTA, filed June 27, 1997.

Before the **Public Utilities Commission of the State of California**, in *Re: Rulemaking on the Commission's Own Motion to Govern Open Access to Bottleneck Services and Establish a Framework for Network Architecture Development of Dominant Carrier Networks*, R.93-04-003, I.93-04-002AT&T, filed March 19, 1997, reply April 7, 1997.

Before the **Puerto Rico Telecommunications Regulatory Board**, in *Re: In the Matter of Centennial Petition for Arbitration with PRTC*, on behalf of Centennial Cellular Corporation, filed February 14, 1997, supplemental March 10, 1997.

Before the **Federal Communications Commission**, in *Re: In the Matter of Access Charge Reform*, CC Docket 96-262, on behalf of AT&T, filed January 29, 1997, reply February 14, 1997.

1996

Before the **New Jersey Board of Public Utilities**, in *Re: In the Matter of the Investigation Regarding Local Exchange Competition for Telecommunications Services*, TX95120631, on behalf of New Jersey Cable Television Association, filed on August 30, 1996, reply September 9, 1997, October 20, 1997, cross-examination September 12, 1996, December 20, 1996.

Before the **State Corporation Commission of the State of Kansas**, in *Re: In the Matter of a General Investigation Into Competition Within the Telecommunications Industry in the State of Kansas*, 190, 492-U 94-GIMT-478-GIT, on behalf of Kansas Cable Telecommunications Association, Inc., filed July 15, 1996, cross-examination August 14, 1996.

Before the **Federal Communications Commission**, in *Re: Price Caps Performance Review for Local Exchange Carriers*, CC Docket 94-1, on behalf of Ad Hoc Telecommunications Users Committee, filed July 12, 1996.

Before the **State Corporation Commission of the State of Kansas**, in *Re: In the Matter of a General Investigation Into Competition Within the Telecommunications Industry in the State of Kansas*, 190, 492-U 94-GIMT-478-GIT, on behalf of Kansas Cable Telecommunications Association, Inc., filed June 14, 1996, cross-examination August 14, 1996.

Before the **Federal Communications Commission**, in *Re: In the Matter of Implementation of the Local Competition Provisions of Telecommunications Act of 1996*, CC Docket 96-98, filed May 1996.

Before the **Federal Communications Commission**, in *Re: Puerto Rico Telephone Company (Tariff FCC No. 1)*, Transmittal No. 1, on behalf of Centennial Cellular Corp., filed April 29, 1996.

Before the **United States District Court for the Eastern District of Tennessee at Greeneville**, in *Re: Richard R. Land, Individually and d/b/a The Outer Shell, and on behalf of all others similarly situated, Plaintiffs, vs. United Telephone-Southeast, Inc., Defendant*, CIV 2-93-55, filed December 7, 1996.

1995

Before the **Federal Communications Commission**, in *Re: Bentleyville Telephone Company Petition and Waiver of Sections 63.54 and 63.55 of the Commission's Rules and Application for Authority to Construct and Operate, Cable Television Facilities in its Telephone Service Area*, W-P-C-6817, on behalf of the Helicon Group, L.P. d/b/a Helicon Cablevision, filed November 2, 1995.

Before the **US District Court for the Eastern District of Tennessee**, in *Re: Richard R. Land, Individually and d/b/a The Outer Shell, and on behalf of all others similarly situated, Plaintiffs, vs. United Telephone-Southeast, Inc., Defendant*, 2-93-55, Class Action, filed June 12, 1995.

Before the **Connecticut Department of Public Utility Control**, in *Re: Application of SNET Company for approval to trial video dial tone transport and switching*, 95-03-10, on behalf of New England Cable TV Association, filed May 8, 1995, cross-examination May 12, 1995.

Before **Canadian Radio-Television and Telecommunications Commission**, in *Re: CRTC Order in Council 1994-1689*, Public Notice CRTC 1994-130 (Information Highway), filed March 10, 1995.

Before the **Federal Communications Commission**, in *Re: GTE Hawaii's Section 214 Application to provide Video Dialtone in Honolulu, Hawaii*, W-P-C- 6958, on behalf of Hawaii Cable TV Association, filed January 17, 1995 (Reply to Amended Applications).

Before the **Federal Communications Commission**, in *Re: GTE Hawaii's Section 214 Application to provide Video Dialtone in Ventura County*, W-P-C 6957, on behalf of the California Cable TV Association, filed January 17, 1995 (Reply to Amended Applications).

Before the **Federal Communications Commission**, in *Re: GTE Florida's Section 214 Application to Provide Video Dialtone in the Pinellas County and Pasco County, Florida areas*, W-P-C 6956, on behalf of Florida Cable TV Association, filed January 17, 1995 (Reply to Amended Applications).

Before the **Federal Communications Commission**, in *Re: GTE Virginia's Section 214 Application to provide Video Dialtone in the Manassas, Virginia area*, W-P-C 6956, on behalf of Virginia Cable TV Association, filed January 17, 1995 (Reply to Amended Applications).

1994

Before the **Federal Communications Commission**, in *Re: NET's Section 214 Application to provide Video Dialtone in Rhode Island and Massachusetts*, W-P-C 6982, W-P-C 6983, on behalf of New England Cable TV Association, filed December 22, 1994 (Reply to Supp. Responses).

Before the **State Corporation Commission of the State of Kansas**, in *Re: General Investigation into Competition*, 190, 492-U 94-GIMT-478-GIT, on behalf of Kansas CATV Association, filed November 14, 1994, cross-examination December 1, 1994.

Before the **Federal Communication Commission**, in *Re: Carolina Telephone's Section 214 Application to provide Video Dialtone in areas of North Carolina*, W-P-C 6999, on behalf of North Carolina Cable TV Association, filed October 20, 1994, reply November 8, 1994.

Before the **Federal Communication Commission**, in *Re: NET's Section 214 Application to provide Video Dialtone in Rhode Island and Massachusetts*, W-P-C 6982, W-P-C 6983, on behalf of New England Cable TV Association, filed September 8, 1994, reply October 3, 1994.

Before the **California Public Utilities Commission**, in *Re: Petition of GTE-California to Eliminate the Preapproval Requirement for Fiber Beyond the Feeder*, 1.87-11-033, on behalf of California Bankers Clearing House, County of LA, filed August 24, 1994.

Before the **Federal Communications Commission**, in *Re: BellSouth Telecommunications Inc., Section 214 Application to provide Video Dialtone in Chamblee, GA and Dekalb County, GA*, W-P-C 6977, on behalf of Georgia Cable TV Association, filed August 5, 1994.

Before the **Federal Communications Commission**, in *Re: Bell Atlantic Telephone Companies Section 214 Application to provide Video Dialtone within their Telephone Services Areas*, W-P-C 6966, on behalf of Mid Atlantic Cable Coalition, filed July 28, 1994, reply August 22, 1994.

Before the **Federal Communication Commission**, in *Re: GTE Hawaii's 214 Application to provide Video Dialtone in Honolulu, Hawaii*, W-P-C 6958, on behalf of Hawaii Cable TV Association, filed July 1, 1994, and July 29, 1994.

Before the **Federal Communication Commission**, in *Re: GTE California's Section 214 Application to provide Video Dialtone in Ventura County*, W-P-C 6957, on behalf of California Cable TV Association, filed July 1, 1994, and July 29, 1994.

Before the **Federal Communication Commission**, in *Re: GTE Florida's 214 Application to provide Video Dialtone in the Pinellas and Pasco County, Florida areas*, W-P-C 6956, on behalf of Florida Cable TV Association, filed July 1, 1994, and July 29, 1994.

Before the **Federal Communication Commission**, in *Re: GTE Virginia's 214 Application to provide Video Dialtone in the Manassas, Virginia area*, W-P-C 6955, on behalf of the Virginia Cable TV Association, filed July 1, 1994, and July 29, 1994.

Before the **Federal Communications Commission**, in *Re: US WEST's Section 214 Application to provide Video Dialtone in Boise, Idaho and Salt Lake City, Utah*, W-P-C 6944-45, before the Idaho and Utah Cable TV Association, filed May 31, 1994.

Before the **Federal Communication Commission**, in *Re: US WEST's Section 214 Application to provide Video Dialtone in Portland, OR; Minneapolis, St. Paul, MN; and Denver, CO*, W-P-C 6919-22, on behalf of Minnesota & Oregon Cable TV Association, filed March 28, 1994.

Before the **Federal Communications Commission**, in *Re: Ameritech's Section 214 Application to provide Video Dialtone within areas in Illinois, Indiana, Michigan, Ohio, and Wisconsin*, W-P-C-6926-30, on behalf of Great Lakes Cable Coalition, filed March 10, 1994, reply April 4, 1994.

Before the **Federal Communications Commission**, in *Re: Pacific Bell's Section 214 Application to provide Video Dialtone in Los Angeles, Orange County, San Diego, and Southern San Francisco Bay areas*, W-P-C-6913-16, on behalf of Comcast/Cablevision Inc., filed Feb. 11, 1994, reply March 11, 1994.

Before the **Federal Communications Commission**, in *Re: SNET's Section 214 Application to provide Video Dialtone in Connecticut*, W-P-C 6858, on behalf of New England Cable TV Association, filed January 20, 1994, reply February 23, 1994.

1993

Before the **Arkansas Public Service Commission**, in *Re: Earnings Review of Southwestern Bell Telephone Company*, 92-260-U, on behalf of Arkansas Press Association, filed September 2, 1993.

Before the **United States District Court for the Eastern District of Tennessee at Greenville**, in *Re: Cleo Stinnett, et al. Vs. BellSouth Telecommunications, Inc. d/b/a/ South Central Bell Telephone Company, Defendant*, Civil Action No 2-92-207, Class Action, cross-examination May 10, 1993, and Feb. 10, 1994.

Before the **Federal Communications Commission**, in *Re: NJ Bell's Section 214 Application to provide Video Dialtone service within Dover Township, and Ocean County, New Jersey*, W-P-C-6840, on behalf of New Jersey Cable TV Association, filed January 21, 1993.

1992

Before the **New Jersey Board of Regulatory Commissioners**, in *Re: NJ Bell Alternative Regulation*, T092030358, on behalf of NJ Cable TV Association, filed September 21, 1992.

Before the **New Hampshire Public Utilities Commission**, in *Re: Generic competition docket*, DR 90-002, on behalf of Office of the Consumer Advocate, filed May 1, 1992, reply July 10, 1992, Surrebuttal August 21, 1992.

Before the **New Jersey General assembly Transportation, Telecommunications, and Technology Committee**, *Concerning A-5063*, on behalf of NJ Cable TV Association, filed January 6, 1992.

1991

Before the **New Jersey Senate Transportation and Public Utilities Committee**, in *Re: Concerning Senate Bill S-3617*, on behalf of New Jersey Cable Television Association, filed December 10, 1991.

Before the **119th Ohio General Assembly Senate Select Committee on Telecommunications Infrastructure and Technology**, in *Re: Issues Surrounding Telecommunications Network Modernization*, on behalf of the Ohio Cable TV Association, filed March 7, 1991.

Before the **Tennessee Public Service Commission**, in *Re: Master Plan Development and TN Regulatory Reform Plan*, on behalf of TN Cable TV Association, filed February 20, 1991.

1990

Before the **Tennessee Public Service Commission**, in *Re: Earnings Investigation of South Central Bell*, 90-05953, on behalf of the TN Cable Television Association, filed September 28, 1990.

Before the **New York Public Service Commission**, in *Re: NYT Rates, 90-C-0191, on behalf of User Parties NY Clearing House Association*, filed July 13, 1990, Surrebuttal July 30, 1990.

Before the **Louisiana Public Service Commission**, in *Re: South Central Bell Bidirectional Usage Rate Service*, U-18656, on behalf of Answerphone of New Orleans, Inc., Executive Services, Inc., King Telephone Answering Service, et al, filed January 11, 1990.

1989

Before the **Georgia Public Service Commission**, in *Re: Southern Bell Tariff Revision and Bidirectional Usage Rate Service*, 3896-U, on behalf of Atlanta Journal Const./Voice Information Services Company, Inc., GA Association of Telemessaging Services, Prodigy Services, Company, Telnet Communications, Corp., filed November 28, 1989.

Before the **New York State Public Service Commission**, in *Re: NYT Co. - Rate Moratorium Extension - Fifth Stage Filing*, 28961 Fifth Stage, on behalf of User Parties NY Clearing House Association Committee of Corporate Telecommunication Users, filed October 16, 1989.

Before the **Delaware Public Service Commission**, in *Re: Diamond State Telephone Co. Rate Case*, 86-20, on behalf of DE PSC, filed June 16, 1989.

Before the **Arizona Corporation Committee**, in *Re: General Rate Case*, 86-20, on behalf of Arizona Corporation Committee, filed March 6, 1989.

1988

Before **New York State Public Service Commission**, in *Re: NYT Rate Moratorium Extension*, 28961, on behalf of Capital Cities/ ABC, Inc., AMEX Co., CBS, Inc., NBC, Inc., filed December 23, 1988.

1989

Before **Rhode Island Public Utilities Commission**, in *Re: New England Telephone*, 1475, on behalf of RI Bankers Association, filed August 11, 1987, cross-examination August 21, 1987.

Before the **New York State Public Service Commission**, in *Re: General Rate Case Subject to Competition*, 29469, on behalf of AMEX Co., Capital Cities/ ABNC, Inc., NBC, Inc., filed April 17, 1987, cross-examination May 20, 1987.

Before the **Minnesota Public Utilities Commission**, in *Re: Northwestern Bell*, P-421/ M-86-508, on behalf of MN Bus. Utilities Users Counsel, filed February 10, 1987, cross-examination March 5, 1987.

1986

Before the **Kansas Public Utilities Commission**, in *Re: Southwestern Bell*, 127, 140-U, on behalf of Boeing Military, et al., filed August 15, 1986.

1985

Before the **Washington Utilities and Transportation Commission**, in *Re: Cost of Service Issues bearing on the Regulation of Telecommunications Company*, on behalf of US Department of Energy, filed November 18, 1985 (Reply Comments).

1984

Before the **Maine Public Utilities Commission**, in *Re: New England Telephone*, 83-213, on behalf of Staff, ME PUC, filed February 7, 1984, cross-examination March 16, 1984.

Before the **Kentucky Public Service Commission**, in *Re: South Central Bell*, U-4415, on behalf of MS PSC, filed January 24, 1984, cross-examination February 1984.

1983

Before the **Kentucky Public Service Commission**, in *Re: South Central Bell*, 8847, on behalf of KY PSC, filed November 28, 1983, cross-examination December 1983.

Before the **Florida Public Service Commission**, in *Re: Southern Bell Rate Case*, 820294-TP, on behalf of Florida Department of General Services, FL Ad Hoc Telecommunications Users, filed March 21, 1983, cross-examination May 5, 1983.

1982

Before the **Maine Public Utilities Commission**, in *Re: New England Telephone*, 82-142, on behalf of Staff, ME PUC, filed November 15, 1982, cross-examination December 9, 1982.

Before the **Kentucky Public Service Commission**, in *Re: South Central Bell*, 8467, on behalf of the Commonwealth of Kentucky, cross-examination August 26, 1982.

Kentucky Power Company
KPSC Case No. 2017-00179 General Rate Adjustment
KCTA's Second Set of Data Requests
Dated September 8, 2017

DATA REQUEST

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.

RESPONSE

Kentucky Power's property records are not maintained by height of pole. Therefore, the requested information by pole height is not available. Kentucky Power's number of total poles in Account 364 as of December 31, 2015 is 215,532 and December 31, 2016 is 216,439.

Witness: Tyler H. Ross

Kentucky Power Company
KPSC Case No. 2017-00179 General Rate Adjustment
KCTA's Second Set of Data Requests
Dated September 8, 2017

DATA REQUEST

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

RESPONSE

Kentucky Power's property records are not maintained by height of pole. Therefore, the requested information by pole height is not available. Shown below are Kentucky Power's total number of poles as of December 31, 2010, 2011, 2012, 2013 and 2014:

2010 - 209,984

2011 - 211,134

2012 - 212,645

2013 - 213,900

2014 - 214,650

Witness: Tyler H. Ross

Kentucky Power Company
KPSC Case No. 2017-00179 General Rate Adjustment
KCTA's Second Set of Data Requests
Dated September 8, 2017

DATA REQUEST

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 foot poles; (b) total gross pole investment in 40 foot poles; and (c) total gross pole investment in 45 foot poles.

RESPONSE

Kentucky Power's utility pole property records are not maintained by height of pole. Therefore, the requested information by pole height is not available. Please see the Company's response to KCTA_1_004 and KCTA_1_003 for Kentucky Power's gross pole investment in Account 364 as of December 31, 2015 and December 31, 2016, respectively.

Witness: Tyler H. Ross

Kentucky Power Company
KPSC Case No. 2017-00179 General Rate Adjustment
KCTA's Second Set of Data Requests
Dated September 8, 2017

DATA REQUEST

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

RESPONSE

Kentucky Power's property records are not maintained by height of pole. Therefore, the requested information by pole height is not available. Kentucky Power's depreciation reserve in Account 364 as of December 31, 2015 is \$77,184,956.94 and December 31, 2016 is \$81,514,131.57.

Witness: Tyler H. Ross

Kentucky Power Company
KPSC Case No. 2017-00179 General Rate Adjustment
KCTA's Second Set of Data Requests
Dated September 8, 2017

DATA REQUEST

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.

RESPONSE

Please refer to attachments KPCO_R_KCTA_2_21_Attachment1.xls (for 2015) and KPCO_R_KCTA_2_21_Attachment2.xls (for 2016) for the requested information. Kentucky Power's records are not maintained by height of pole. Predominantly all of the poles included in the attached files are wooden poles.

Witness: Tyler H. Ross

Standard Rate

PSA

Pole and Structure Attachment Charges

“Person” is defined by KRS 278.010(2).

“Service Drop” means a Cable, attached to a pole with a J-hook or other similar hardware that connects the trunk line to an end user’s premises.

“Structure” means any Company pole, conduit, duct, or other facility normally used by the Company to support or protect its electric conductors but shall not include (1) any Transmission Pole other than Transmission Poles to which the Company has attached its own electric supply lines operated at less than 69kV; (2) any street light pole that is not a wood pole located in a public right-of-way; or (3) any pole that the Company has leased to a third party.

“Supply Space” means the space above the Communications Worker Safety Zone used for the installation of electric supply lines.

“Telecommunications carrier” means a Person who operates a system that (1) transmits by wire or wireless means, between or among points specified by the user, information of the user’s choosing without change in the form or content of the information as sent or received, and (2) provides such transmission services for a fee directly to or for the public, or to such classes of users as to be effectively available directly to or for the public, and includes, but is not limited to, internet service providers, voice over internet protocol service providers, cellular and mobile phone service providers or resellers of such services.

“Transmission Pole” means any utility pole or tower supporting electric supply facilities designed to operate at 69 kV or greater.

“Wireless Facility” means, without limitation, antennas, risers, transmitters, receivers, and all other associated equipment used in connection with Attachment Customer’s provision of wireless communications services and the transmission and reception of radiofrequency signals, but shall not include power supplies, equipment cabinets, meter bases, and other equipment that impedes accessibility or that conflicts with the Company’s electric design and construction standards.

ATTACHMENT CHARGES

\$ 7.25 per year for each wireline pole attachment.

\$ 0.81 per year for each linear foot of duct.

\$36.25 per year for each Wireless Facility located on the top of a Company pole.

The attachment charge for any other Wireless Facility shall be agreed upon by Attachment Customer and the Company and set forth in a special contract to be filed with the Commission.

BILLING

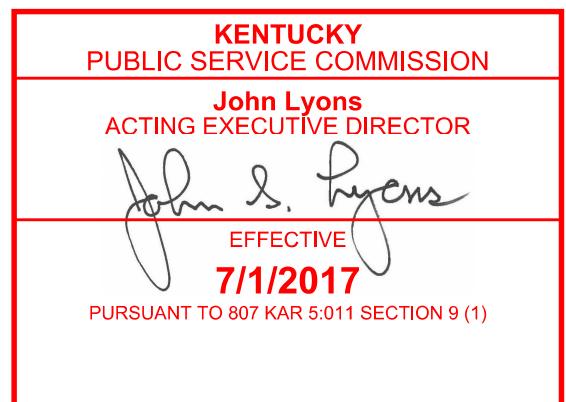
All attachment charges for use of Structures will be billed semi-annually based upon the type and number of Attachment Customer’s Attachments reflected in Company’s records on December 1

DATE OF ISSUE: July 7, 2017

DATE EFFECTIVE: July 1, 2017

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Lexington, Kentucky

**Issued by Authority of an Order of the
Public Service Commission in Case No.
2016-00370 dated June 22, 2017 and modified June 29, 2017**



Louisville Gas and Electric Company

P.S.C. Electric No. 11, Original Sheet No. 40.2

Standard Rate

PSA

Pole and Structure Attachment Charges

"Person" is defined by KRS 278.010(2).

"Service Drop" means a Cable, attached to a pole with a J-hook or other similar hardware that connects the trunk line to an end user's premises.

"Structure" means any Company pole, conduit, duct, or other facility normally used by the Company to support or protect its electric conductors but shall not include (1) any Transmission Pole other than Transmission Poles to which the Company has attached its own electric supply lines operated at less than 69kV; (2) any street light pole that is not a wood pole located in a public right-of-way; or (3) any pole that the Company has leased to a third party.

"Supply Space" means the space above the Communications Worker Safety Zone used for the installation of electric supply lines.

"Telecommunications carrier" means a Person who operates a system that (1) transmits by wire or wireless means, between or among points specified by the user, information of the user's choosing without change in the form or content of the information as sent or received, and (2) provides such transmission services for a fee directly to or for the public, or to such classes of users as to be effectively available directly to or for the public, and includes, but is not limited to, internet service providers, voice over internet protocol service providers, cellular and mobile phone service providers or resellers of such services.

"Transmission Pole" means any utility pole or tower supporting electric supply facilities designed to operate at 69 kV or greater.

"Wireless Facility" means, without limitation, antennas, risers, transmitters, receivers, and all other associated equipment used in connection with Attachment Customer's provision of wireless communications services and the transmission and reception of radiofrequency signals, but shall not include power supplies, equipment cabinets, meter bases, and other equipment that impedes accessibility or that conflicts with the Company's electric design and construction standards.

ATTACHMENT CHARGES

\$ 7.25 per year for each wireline pole attachment.

\$ 0.81 per year for each linear foot of duct.

\$36.25 per year for each Wireless Facility located on the top of a Company pole.

The attachment charge for any other Wireless Facility shall be agreed upon by Attachment Customer and the Company and set forth in a special contract to be filed with the Commission.

BILLING

All attachment charges for use of Structures will be billed semi-annually based upon the type and number of Attachment Customer's Attachments reflected in Company's records on December 1

DATE OF ISSUE: July 7, 2017

DATE EFFECTIVE: July 1, 2017

ISSUED BY: /s/ Robert M. Conroy, Vice President
State Regulation and Rates
Louisville, Kentucky

Issued by Authority of an Order of the
Public Service Commission in Case No.
2016-00371 dated June 22, 2017 and modified June 29, 2017

KENTUCKY
PUBLIC SERVICE COMMISSION

John Lyons
ACTING EXECUTIVE DIRECTOR


EFFECTIVE
7/1/2017

PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

Kravtin Rate Calculations Using LG&E O&M

Louisville Gas & Electric Company Data As Of:

31-Mar-12

31-Oct-14

Weighted Average Bare Pole Cost	Two-User	Three-User	Two-User	Three-User	Notes/Sources
Installed Costs					
35' Poles	\$11,527,332		\$12,786,133		
40' Poles	\$27,701,656	\$27,701,656	\$31,220,040	\$31,220,040	
45" Poles		\$27,726,577		\$35,703,828	
Sum Installed Costs	\$39,228,988	\$55,428,233	\$44,006,173	\$66,923,867	
- Investment in Minor Appearances	\$5,884,348	\$8,314,235	\$6,600,926	\$10,038,580	KPSC Admin 251, Case 2004-00319
= Investment in Bare Pole Plant	33,344,640	\$47,113,998	37,405,247	\$56,885,287	
Quantity of Poles					
35' Poles	23,130		23,334		
40' Poles	59,477	59,477	59,312	59,312	
45" Poles		22,455		23,443	
/ Sum Quantity	82,607	81,932	82,646	82,755	
=Weighted Average Cost per Bare Pole	\$403.65	\$575.04	\$452.60	\$687.39	
Carrying Charges					
Rate of Return					
Net Investment Acct 364 Pole Plant	7.80%		7.31%		7.31%
Gross Investment Acct 364 Pole Plant /	\$67,227,853	\$67,227,853	\$86,316,298	\$86,316,298	
Ratio Net to Gross Plant	0.495	0.495	0.541	0.541	See KPSC Case 2000-414
Rate of Return Applied to Gross Pole Plant	3.86%	3.86%	3.95%	3.95%	
Depreciation					
Rate of Return Applied to Gross Pole Plant	3.86%		3.95%		3.95%
Number of Years Plant in Service	35	35	35	35	
Sinking Fund Factor	1.40%	1.40%	1.37%	1.37%	
Income Tax					
Return on Equity Component of ROR	11.00%		10.50%		10.50%
x Percentage Equity	55.64%	55.64%	54.04%		54.04%
= Return on Equity Component	6.12%	6.12%	5.67%		5.67%
Net Investment Acct 364 Pole Plant	\$67,227,853	\$67,227,853	\$86,316,298	\$86,316,298	
Gross Investment Acct 364 Pole Plant /	\$135,724,485	\$135,724,485	\$159,591,768	\$159,591,768	
Ratio Net to Gross Plant	0.495	0.495	0.541	0.541	See KPSC Case 2000-414
Return on Equity Applied to Gross Pole Plant	3.03%	3.03%	3.07%	3.07%	
Composite Fed. And State Income Tax Rate	37.37%	37.37%	37.52%	37.52%	
Income Tax Factor	1.81%	1.81%	1.84%	1.84%	
Property Tax and Insurance					
Percentage Applicable to Poles	0.22%	0.22%	0.22%	0.22%	
Operation and Maintenance					
Labor Charged to Maintenance Accts 593001+593004	\$509,449	\$509,449	\$506,600	\$506,600	
Total Labor	\$63,964,275	\$63,964,275	\$70,473,158	\$70,473,158	
Ratio Designated 593 Labor to Total Labor	0.80%	0.80%	0.72%	0.72%	
Total A&G Expenses	\$83,493,455	\$83,493,455	\$82,720,225	\$82,720,225	

A&G Expenses Assigned to Poles	\$664,991	\$664,991	\$594,638	\$594,638
Maintenance of Poles, Towers & Fixtures Acct 593001	\$564,286	\$564,286	\$474,899	\$474,899
Tree Trimming Elec. Distribution Routes Acct 593004	\$7,007,225	\$7,007,225	\$7,870,074	\$7,870,074
Sum Expenses Assigned to Poles	\$8,236,502	\$8,236,502	\$8,939,611	\$8,939,611
Gross Investment Account 364	\$135,724,485	\$135,724,485	\$159,591,768	\$159,591,768
O&M Expense Factor	6.07%	6.07%	5.60%	5.60%
Total Carrying Charges	13.36%	13.36%	12.99%	12.99%

Usage Space Factor	0.1224	0.0759	0.1224	0.0759
KPSC Usage Space Factor	0.1224	0.0759	0.1224	0.0759

Maximum Pole Attachment Rates				
Investment Per Bare Pole	\$403.65	\$575.04	\$452.60	\$687.39
*Carrying Charges	13.36%	13.36%	12.99%	12.99%
*Charge Factor	12.24%	7.59%	12.24%	7.59%
Maximum Pole Attachment Rate	\$6.60	\$5.83	\$7.20	\$6.78
Maximum Weighted Pole Attachment Rate	\$6.22	\$6.99	\$6.99	\$6.78
Estimated Number of Attachments	86,757	86,757	87,522	87,522
Percentage of Total Attachments	50.00%	50.00%	50.00%	50.00%

DATA ENTRY AND SOURCE				
Gross Investment in 364	\$135,724,485	\$135,724,485	\$159,591,768	\$159,591,768 KCTA 1-2
Gross Investment in 365	\$241,550,956	\$241,550,956	\$271,406,761	\$271,406,761 KCTA 2-31
Gross Investment in 369	\$28,406,648	\$28,406,648	\$29,949,603	\$29,949,603 KCTA 2-31
Sum 364,365,369	\$405,682,089	\$405,682,089	\$460,948,133	\$460,948,133 sum
Total Depreciation Reserve for 364	\$68,496,632.25	\$68,496,632.25	\$73,275,470	\$73,275,470 KCTA 1-10

Gross Plant Investment	\$4,933,705,788.03	\$4,933,705,788.03	\$6,268,420,954	\$6,268,420,954 KCTA 1-22
Accum Depreciation All Plant	\$2,144,260,455.77	\$2,144,260,455.77	\$2,406,013,061	\$2,406,013,061 KCTA 1-23

Overall Rate of Return	7.80%	7.80%	7.31%	7.31% KCTA 1-1/Blake Sche-J-1 p2
Return on Equity Component of ROR	11.00%	11.00%	10.50%	10.50% KCTA 1-1/Blake Sche-J-1 p2
Percentage Equity Component	55.64%	55.64%	54.04%	54.04% KCTA 1-1/Blake Sche-J-1 p2
Composite Fed. And State Income Tax Rate	37.37%	37.37%	37.52%	37.52% Wkpr WPH-1-A

Percentage Reduction Appurtenances	15%	15%	15%	15% KCTA 2-5,6,7,8,9,10
Maintenance of Poles, Towers & Fixtures Acct 593001	\$564,286	\$564,286	\$474,899	\$474,899 KCTA 1-1, 1-19
Tree Trimming Electric Distribution Routes Acct 593004	\$7,007,225	\$7,007,225	\$7,870,074	\$7,870,074 KCTA 1-1, 1-19
Total A&G Expenses	\$83,493,455	\$83,493,455	\$82,720,225	\$82,720,225 KCTA 1-1,1-21 (A&G Tab)
Labor Charged to 593001	\$232,934	\$232,934	\$196,035.48	\$196,035.48 KCTA 1-1, prorated 2014
Labor Charged to 593004	\$276,515	\$276,515	\$310,564.24	\$310,564.24 KCTA 1-1, prorated 2014
Sum Labor 593001,593004	\$509,449	\$509,449	\$506,600	\$506,600
Total Labor -Electric Cost of Service	\$63,964,275	\$63,964,275	\$70,473,158	\$70,473,158 KCTA 1-1, prorated 2014 per 2-4
Ratio 593 Labor / Total Labor	0.00796	0.00796	0.00719	0.00719 calculation

A&G Expenses Assigned to Poles	\$664,991	\$664,991	\$594,638	\$594,638 calculation
Total Labor - General Ledger All Accounts	\$106,931,638	\$106,931,638	\$117,812,798	\$117,812,798 KCTA 2-4
A&G Expenses Assigned to Poles Based on Gen Ledg	\$397,784	\$397,784	\$355,700	\$355,700 calculation
Property Tax and Insurance	0.22%	0.22%	0.22%	0.22% KCTA 1-1
Estimated Number of Attachments	86,757	86,757	87,522	87,522 KCTA 1-1,1-14, as of 6/30/14
Installed Costs				
35' Poles	\$11,527,332	\$11,527,332	\$12,786,133	\$12,786,133 KCTA 1-4
40' Poles	\$27,701,656	\$27,701,656	\$31,220,040	\$31,220,040 KCTA 1-6
45" Poles	27,726,577	27,726,577	\$35,703,828	\$35,703,828 KCTA 1-8
Quantity of Poles				
35' Poles	23,130	23,130	23,334	23,334 KCTA 1-5
40' Poles	59,477	59,477	59,312	59,312 KCTA 1-7
45" Poles	22,455	22,455	23,443	23,443 KCTA 1-9
Total 35'/40'/45' Poles	105,062	105,062	106,089	106,089 calculation
Total No Poles Acct 364	141,804	141,804	143,303	143,303 KCTA 1-3

Kentucky Power Company
KPSC Case No. 2017-00179 General Rate Adjustment
KCTA's Second Set of Data Requests
Dated September 8, 2017

DATA REQUEST

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.

RESPONSE

Please refer to KPCO_R_KCTA_2_25_Attachment1.xlsx for the requested information

Witness: Stephen L. Sharp

ID	Year							Grand Total
	2010	2011	2012	2013	2014	2015	2016	
JNT-APPLIC FEE				1,000.00	500.00	500.00	500.00	2,500.00
JNT-ENG COSTS	52,137.65	153,459.07	6,192.93	10,088.64	81,549.58	53,434.97	490,841.30	847,704.14
JNT-FR POL REP	949.52				642.40		769.20	2,361.12
JNT-IN CONT FEE			670.00		9.19			679.19
JNT-IN CONT RNT		1,390.20	9,433.99	(1,129.27)	12,237.69	7,827.06	17,251.87	47,011.54
JNT-INVENT-CATV			42,623.84	26,793.40	20,559.02	94,228.48	9,874.70	194,079.44
JNT-MAKE READY	62,041.69	65,722.82	37,959.14	67,096.45	50,477.48	29,880.69	2,136,277.04	2,449,455.31
JNT-POLE SALE COST					1,880.26	(1,627.52)		252.74
JNT-UNAUTH REV			230,258.59	259,778.52	199,662.61	369,693.84	56,920.83	1,116,314.39
STM-LABOR		126.84						126.84
Grand Total	115,128.86	220,698.93	327,138.49	363,627.74	367,518.23	553,937.52	2,712,434.94	4,660,484.71

JNT-APPLIC FEE	Application fee for a new agreement to attach to KY poles
JNT-ENG COSTS	Make Ready Engineering costs for new attachments to KY poles
JNT-FR POL REP	Reimbursement for changing out other companies pole
JNT-IN CONT FEE	Initial fee for new attachments
JNT-IN CONT RNT	Partial rental for new attachments
JNT-INVENT-CATV	Cost of inventory
JNT-MAKE READY	Make Ready Construction costs for new attachments to KY poles
JNT-POLE SALE COST	Sale of KY abandoned pole to attacher
JNT-UNAUTH REV	Back rent for unauthorized attachments found in inventory
STM-LABOR	Labor associated with removal of nonpaying attachers