

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF)	
KENTUCKY UTILITIES COMPANY FOR AN)	CASE NO. 2018-00294
ADJUSTMENT OF ITS RATES)	

ELECTRONIC APPLICATION OF)	
LOUISVILLE GAS AND ELECTRIC)	CASE NO. 2018-00295
COMPANY FOR AN ADJUSTMENT OF ITS)	
ELECTRIC AND GAS RATES)	

DATA REQUESTS OF
KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY
PROPOUNDED TO CHARTER COMMUNICATIONS OPERATING, LLC

Kentucky Utilities Company (“KU”) and Louisville Gas and Electric Company (“LG&E”) (collectively, “the Companies”) respectfully submit the following data requests to Charter Communications Operating, LLC (“Charter”), to be answered by the date specified in the procedural schedule established by the Kentucky Public Service Commission (“Commission”) in this matter on October 11, 2018.

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, Charter, 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 Charter 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 Charter 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 Charter, 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

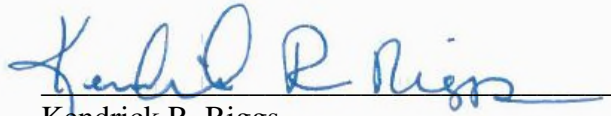
Mr. Crone

1. Please provide a complete list of cases, including case numbers, in which you have testified before regulatory commissions in the last ten years. Please provide copies of your testimony in each case.
2. Describe the geographical area contained in Charter's Southern Ohio Region.
3. Please state specifically the utilities (public and municipal) in the Southern Ohio Region that have poles or other structures to which Charter attaches its equipment and facilities.
4. For each utility listed above, provide the attachment agreement, utility tariff, and municipal ordinance that govern the attachment of Charter's facilities.
5. Refer to Mr. Crone's responses to KU's and LG&E's First Requests for Information to Kentucky Cable Telecommunications Association in Case Nos. 2016-00370 and 2016-00371, Items 6 – 8. State whether, if posed those same questions in these Requests, Mr. Crone's responses to these questions would be the same. If his responses would not be the same, describe how they would differ from those provided in the original 2016 responses.
 - a. List and describe each type of information that Charter records and maintains on each attachment that it makes to the Companies' facilities.
 - b. Describe how Charter maintains this information.
 - c. Describe how accessible this information is to Charter.
 - d. State whether the type and amount of information that Charter records and maintains on the facilities that it attaches to a utility's poles and other structures differs based upon the utility that owns the poles and structures or the regulatory jurisdiction in which the poles and structures are located. If the type and amount of information differs, identify the utility or jurisdiction in which the most information is recorded and the types of information maintained.
6. State whether Mr. Crone agrees that:
 - a. The current version of Rate PSA Schedule provides: "If the audit reveals that the number of Attachments exceeds the number of attachments shown in Company's existing records, the excess number of Attachments shall be presumed to be Unauthorized Attachments. Attachment Customer shall have the right to rebut this presumption and demonstrate that the attachments at issue were authorized."

- b. The current version of Rate PSA Schedule was approved in Case Nos. 2016-00370 and 2016-00371.
 - c. The Kentucky Cable Telecommunications Association represented the interests of its members, including Charter Communications, in Case Nos. 2016-00370 and 2016-00371.
 - d. KCTA stipulated to the Kentucky Public Service Commission in Case Nos. 2016-00370 and 2016-00371 that the current version of Rate PSA was “fair, just, and reasonable, will promote public safety, enhance the reliability of electric service, and ensure fair and uniform treatment of Attachment customers as well as promote the deployment and adoption of advanced communications services.”
- 7. Refer to pages 13 and 14 of Mr. Crone’s testimony. Define “revenue collection information.”
 - 8. Identify the regulatory jurisdictions in which Charter operates and has attached its facilities to the poles and other structures of electric utilities that permit pole and structure owners to assess a fee or penalty for unauthorized attachments.
 - 9. Identify the investor-owned utilities to whose poles and structures Charter has attached its facilities that assess a fee or penalty for unauthorized attachments to those poles and structures.
 - 10. Refer to page 15 of Mr. Crone’s testimony where he states: “As with any increase in costs, the electric rate increase will increase Charter’s costs to provide service to customers.”
 - a. Please provide any calculation or analysis to support this assertion.

Dated: January 31, 2019

Respectfully submitted,



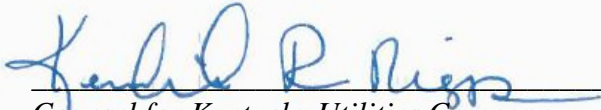
Kendrick R. Riggs
Stoll Keenon Ogden PLLC
2000 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202-2828
Telephone: (502) 333-6000
Fax: (502) 627-8722
kendrick.riggs@skofirm.com

Allyson K. Sturgeon
Managing Senior Counsel
Regulatory and Transactions
LG&E and KU Services Company
220 West Main Street
Louisville, Kentucky 40202
Telephone: (502) 627-2088
Fax: (502) 627-3367
allyson.sturgeon@lge-ku.com

*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 January 31, 2019 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 January 31, 2019; that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding; and that an original in paper medium of the Data Requests will be hand-delivered to the Commission within two business days from the date of the electronic filing.



Kenneth R. Riggs
Counsel for Kentucky Utilities Company
and Louisville Gas and Electric Company