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

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IN THE MATTER OF:

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**THE ELECTRONIC APPLICATION OF)
KENERGY CORP. FOR A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY)
FOR THE CONSTRUCTION OF A HIGH-)
SPEED FIBER NETWORK AND FOR)
APPROVAL OF THE LEASING OF THE)
NETWORK'S EXCESS CAPACITY TO AN)
AFFILIATE TO BE ENGAGED IN THE)
PROVISION OF BROADBAND SERVICE)
TO UNSERVED AND UNDERSERVED)
HOUSEHOLDS AND BUSINESSES OF THE)
COMMONWEALTH)**

CASE NO. 2021-00365

REBUTTAL TESTIMONY OF ROBERT STUMPH

Q1. Please state your name, business address, and position with Kenergy.

A. Robert Stumph, 6402 Old Corydon Road, Henderson, Kentucky 42420. I am the Vice-President, Engineering and Operations.

Q2. Have you reviewed the confidential maps of areas where Charter Communications provides service in Kenergy's territorial counties?

A. Yes.

Q3. Are you able to determine those portions of Kenergy's territory where Charter alleges that it currently provides broadband access?

A. Yes. Exhibit 2 to the Testimony of Jason Keller, which are confidential maps of each county in Kenergy's electric service territory, purports to be an overlay of Kenergy's distribution infrastructure with the areas where Charter provides broadband access.

Even a cursory review of these maps reveals that there is very little overlap between Kenergy's distribution infrastructure and those areas where Charter

1 alleges that it provides broadband access in Kenergy's electric service
2 territory. The maps show that the bulk of Kenergy's service territory remains
3 unserved by Charter. See attached confidential maps showing Kenergy's
4 territory overlaid on the Charter maps provided in data request responses.
5 The red outline shows the boundary of Kenergy's territory. One Charter
6 map provided was of Union, Kentucky, not Union County, Kentucky, and no
7 comparison can be offered.
8

9 **Q4. For those areas that do overlap, are there any particular trends?**

10
11 A. Yes. The vast majority of alleged overlap between Kenergy's service
12 territory and the areas where Charter alleges it provides broadband service is
13 concentrated around the cities of Owensboro and Henderson – the two most
14 populous cities in Kenergy's service territory. Charter's alleged services in
15 areas not surrounding the two largest population densities in Kenergy's
16 service territory is almost non-existent.
17

18 Even in other areas where there is minimal overlap, Charter's alleged service
19 territory is concentrated solely around incorporated cities or commercial
20 customers. The maps provided by Charter prove that the vast majority of
21 Kenergy's member-owners are not provided broadband internet access by
22 Charter.
23

24 **Q5. Does this conclude your rebuttal testimony?**

25 A. Yes.

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COMMONWEALTH)

CASE NO. 2021-00365

REBUTTAL TESTIMONY VERIFICATION

I verify, state and affirm that the rebuttal testimony attached hereto and filed with this verification is true and correct to the best of my knowledge and belief formed after a reasonable inquiry, and I ask that I be added as a witness for this information.



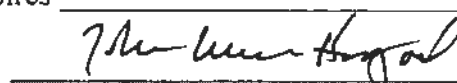
ROBERT STUMPH

STATE OF KENTUCKY

COUNTY OF DAVIESS

The foregoing was signed, acknowledged and sworn to before me by ROBERT STUMPH, this 16th day of March, 2022.

My commission expires 5-3-2024



Notary Public

Notary Public ID No. 599033

MAPS FILED SEPARATELY UNDER
CONFIDENTIALITY