

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	CASE NO.
PROPOSED POLE ATTACHMENT TARIFFS OF)	2022-00105
INVESTOR-OWNED ELECTRIC UTILITIES)	

REQUESTS FOR INFORMATION

Kentucky Power Company (“Kentucky Power”), pursuant to the Commission’s March 30, 2022, Order, respectfully submits these Requests for Information to Bellsouth Telecommunications, LLC d/b/a AT&T Kentucky (“AT&T”) with the following instructions.

INSTRUCTIONS

1. In answering these Requests for Information, please furnish all information that is known or available to you, regardless of 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 your response to each Request for Information 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 Requests for Information 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 Request for Information precisely as it is stated, provide any information that is available and is responsive to the request at a level of detail different from that specified herein.
5. Kentucky Power requests that you produce all documents referenced in any response or that you referenced, reviewed, or relied upon to respond to any Request for Information.

REQUESTS FOR INFORMATION

1. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Daniel Rhinehart. The requested information, if so

available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.

2. Please identify the number of AT&T attachments to Kentucky Power poles that would be governed by Kentucky Power's proposed tariff.
3. Please identify the number of attachments referenced above that do not currently conform to the tagging requirement in Kentucky Power's proposed tariff, ¶ 8, Sheet No. 16-4.
4. Please describe AT&T's inspection cycle for the attachments referenced above. Stated otherwise, with what frequency does AT&T inspect or perform regular maintenance on such attachments (i.e., annually, every 3 years, every 5 years, etc.)?

Dated: June 23, 2022

Respectfully submitted,



Robert J. Patton
Kinner & Patton
328 E. Court Street
Prestonsburg, KY 41653
Telephone: (606) 886-1343
Facsimile: (606) 886-1349
Email: rjpatton@bellsouth.net

Counsel for Kentucky Power Company

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, and the Public Service Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was transmitted to the Public Service Commission on June 23, 2022 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding



Robert J. Patton
Counsel for Kentucky Power Company