

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 the Kentucky Broadband and Cable Association (“KBCA”) 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 schedules, tables, and charts included in the testimony and exhibits to the testimony of Patricia D. Kravtin in electronic format, with formulas intact and visible, and no pasted values.
2. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Ms. Kravtin. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
3. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Jerry Avery. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
4. Please provide all workpapers, source documents, and electronic spreadsheets used in the development of the testimony of Richard Bast. The requested information, if so available, should be provided in an electronic format, with formulas intact and visible, and no pasted values.
5. Please identify with particularity each and every objection KBCA or its predecessors (including but not limited to the Kentucky Broadband Cable Association, “KCTA”), or any of their members, have filed with respect to the Kentucky Power’s approved pole depreciation rates or the useful life of poles used for purposes of determining the depreciation rate.
6. Please identify the per pole survey fee or survey fee estimates paid by each member of KBCA or its predecessors (including but not limited to the KCTA) from January 1, 2019 through the present. Please also identify the company to whom the survey fee or survey fee estimate was paid.
7. With respect to the testimony of Mr. Richard Bast, p. 10, please provide all support for the statement that Kentucky Power’s survey cost estimate is “out of line with the industry norm.”
8. With respect to the testimony of Mr. Jerry Avery, pp. 3-4 & 5-9, please clarify whether KBCA objects to ¶ 26, Sheet 16-11, of Kentucky Power’s proposed tariff. If so:
  - a. Please identify with specificity the portion of ¶ 26 to which KBCA objects and to which Mr. Avery’s testimony is directed;

- b. Please identify the customer contract provision or other applicable term of service, if any, which allows any KBCA member to terminate a customer's service for non-payment;
  - c. Please produce a copy of each KBCA or KCTA member's customer contract or terms of service applicable to any period since January 1, 2019.
  - d. With respect to Mr. Avery's testimony, pp 6-7, please identify with particularity the situations "Charter has faced...where a pole owner has threatened to remove its attachments during a billing dispute" including but not limited to the case where "a pole owner publicly threatened to remove Charter's attachments over a billing dispute, which caused widespread concern and confusion among its customers."
  - e. Please provide all data and other information to support Mr. Avery's testimony at pp. 6-7 that concern was "widespread" or that customers were "confused."
  - f. Please produce the call log or other data to support Mr. Avery's testimony at p. 7 that "Charter faced an onslaught of calls from customers worried their service would be disconnected."
9. In the event Kentucky Power provides written notice that a KBCA member must remove its facilities from Kentucky Power poles dues to a default under a pole attachment tariff or any special contract, please state whether 807 KAR 5:015, Section 6(2)(a) would allow a KBCA member request a stay of a notice of removal.
- a. If your answer is anything other than an unqualified "yes" please explain in detail the basis for your answer.

Dated: June 23, 2022

Respectfully submitted,



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**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*