COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:	
ELECTRONIC INVESTIGATION OF THE)
PROPOSED POLE ATTACHMENT TARIFFS OF INVESTOR OWNED ELECTRIC UTILITIES) CASE NO. 2022-00105

RESPONSE OF LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION DATED JUNE 23, 2022

FILED: JULY 7, 2022

VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Michael E. Hornung**, being duly sworn, deposes and says that he is Manager of Pricing/Tariffs for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.

Michael E. Hornung

Notary Public

Notary Public ID No. 603967

My Commission Expires:

July 14 2022

LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Third Request for Information Dated June 23, 2022

Case No. 2022-00105

Question No. 1

Responding Witness: Michael E. Hornung

- Q-1. Refer to KU's proposed tariff, P.S.C. No. 20, First Revision of Original Sheet No. 40.6, which states in part "If the actual cost for application review exceeds the Attachment Customer's prepayment, Attachment Customer shall reimburse Company for the difference upon presentation of an invoice for such amount." Explain whether KU would refund the difference if the actual cost of application review were less than the Attachment Customer's prepayment. If so, identify the section of the tariff stating that. If not, explain why not.
- A-1. Yes, the Companies would refund the difference if the amount of an Attachment Customer's prepayment is greater than the Companies' actual costs to review the application. However, it is unlikely that actual costs will be less than \$75 per pole. As the refunding of prepayments would be the rare exception, refund language was not explicitly stated within the tariff.

The Companies intend to calculate the difference between an Attachment Customer's prepayments and the Companies' actual costs on a quarterly basis. The Companies expect that, especially when aggregated in this fashion, the calculation will not result in a net overpayment of an Attachment Customer's prepaid application costs.

LOUISVILLE GAS AND ELECTRIC COMPANY AND KENTUCKY UTILITIES COMPANY

Response to Commission Staff's Third Request for Information Dated June 23, 2022

Case No. 2022-00105

Question No. 2

Responding Witness: Michael E. Hornung

- Q-2. Refer to LGE's proposed tariff, P.S.C. Electric No. 13, First Revision of Original Sheet No. 40.6, which states in part "If the actual cost for application review exceeds the Attachment Customer's prepayment, Attachment Customer shall reimburse Company for the difference upon presentation of an invoice for such amount." Explain whether LG&E would refund the difference if the actual cost of application review were less than the Attachment Customer's prepayment. If so, identify the section of the tariff stating that. If not, explain why not.
- A-2. See the response to Question No. 1.