

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

Louisville Gas and Electric Company and Kentucky Utilities Company (together “LGE-KU”), 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. LGE-KU request 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 identify with particularity each and every objection KBCA or its predecessors (including but not limited to the Kentucky Cable and Telecommunications Association, “KCTA”), or any of their members, have filed with respect the LGE-KU’s approved pole depreciation rates or the useful life of poles used for purposes of determining the depreciation rate.

2. With respect to the testimony of Mr. Richard Bast, pp. 4 & 9-12, please clarify whether KBCA objects to the \$75 per pole estimate for wireline attachment application review set forth in ¶ 7.c., Sheet No. 40.6 of LGE-KU’s proposed tariffs. If so:
 - a. Please explain in detail the basis of your objection.

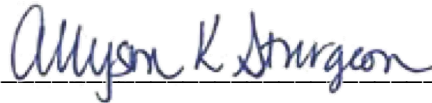
 - b. Please identify the per pole survey fee or survey fee estimates paid by each member of KBCA or its predecessors (including but not limited to the KCTA) from January 1, 2019 through the present. Please also identify the company to whom the survey fee or survey fee estimate was paid.

3. With respect to the testimony of Mr. Avery, pp. 9-10, please identify each outside plant contractor for each KBCA and KCTA member that has performed work on near LGE-KU poles since 7/1/2017.
 - a. Please describe the insurance requirements that each KBCA or KCTA member has required each such contractor to maintain since 7/1/2017.

 - b. Please describe whether and how each KBCA or KCTA member verifies that each such contractor maintains the insurance required by each KBCA or KCTA member.

Dated: June 23, 2022

Respectfully submitted,



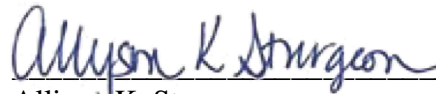
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*Counsel for Louisville Gas and Electric Company
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CERTIFICATE OF SERVICE

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



Allison K. Sturgeon
*Counsel for Louisville Gas and Electric
Company and Kentucky Utilities Company*