

**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**



**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.

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**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.