

**KENTUCKY PUBLIC SERVICE COMMISSION**

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

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The Kentucky Broadband and Cable Association and its members<sup>1</sup> (“KBCA”), pursuant to the Commission’s March 30, 2022, Order, respectfully submits these Supplemental Requests For Information (“RFI”) to Louisville Gas And Electric Company (“LG&E”) and Kentucky Utilities Company (“KU”), in accordance with the following Definitions and Instructions.

**DEFINITIONS**

1. The terms “You,” “Your,” and “the Company” refer to Louisville Gas And Electric Company (“LG&E”) and/or Kentucky Utilities Company (“KU”).
2. The term “KBCA” refers to the Kentucky Broadband and Cable Association.
3. The term “Commission” refers to the Kentucky Public Service Commission.
4. The term “Poles” refers to utility poles in Your electric distribution network in Kentucky that You own or control.
5. The term “Proposed Tariff” refers to the tariff issued February 28, 2022, by Robert M. Conroy, Vice President State Regulation and Rates, in connection with this proceeding.

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<sup>1</sup> The KBCA’s members are Access Cable, Armstrong, C&W Cable, Charter Communications, Comcast, Inter Mountain Cable, Lycom Communications, Mediacom, Suddenlink, and TVS Cable. Kentucky Broadband & Cable Association, Our Members, *available at* <https://www.kybroadband.org/members>.

6. The term “Response” means the Response Of Louisville Gas And Electric Company and Kentucky Utilities Company To Kentucky Broadband And Cable Association’s Initial Request For Information, filed with the Commission on May 5, 2022.

7. All capitalized terms not defined herein shall have the meanings given to them under the Proposed Tariff.

### **INSTRUCTIONS**

1. To the extent a response differs between LG&E and KU, including referencing different data, each entity must respond separately.

2. In answering these Supplemental 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.

3. Please identify at the end of Your response to each Supplemental Request for Information the person or persons most knowledgeable about such response and the person or persons responsible for the preparation of such response.

4. If any information responsive to these Supplemental Requests for Information is withheld, identify the Requests as to which such information is withheld and the reason(s) for withholding it.

5. For any information that You claim is unavailable, state why it is unavailable. If You cannot respond to the Supplemental 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.

6. KBCA requests that You produce all documents referenced in any response or that You referenced, reviewed, or relied upon to respond to any Supplemental Request for Information.

**SUPPLEMENTAL REQUESTS FOR INFORMATION**

2-1. Explain how a new attacher would determine whether a pole was “[d]esignated for replacement within two (2) years of the date of its actual replacement for any reason unrelated to a new attacher’s request for attachment,” as stated in 807 KAR 5:015 Section 1(10)(b), if the pole was not visibly marked with a colored tag or other indication of replacement.


2-2. State whether You will visibly mark “Red-tagged poles,” as that term is defined in 807 KAR 5:015, with colored tags or in some other manner. If You will mark the poles with colored tags, state which colors You will use, and what those colors signify.

2-3. Identify the average amount of time You spend per pole on a pre-construction survey.

2-4. Provide any data related to Your contention that during periods of “high deployment,” “[b]y necessity, Attachment Customers often resort to utilizing lower-quality communications contractors, which leads to a higher incidence of defective installations.” *See* Response to KBCA RFI 1-7.

Dated: May 19, 2022

Respectfully submitted,

/s/ 

James W. Gardner

M. Todd Osterloh

Sturgill, Turner, Barker & Moloney, PLLC

333 West Vine Street, Suite 1500

Lexington, KY 40507

Phone: (859) 255-8581

jgardner@sturgillturner.com

tosterloh@sturgillturner.com

Paul Werner

Hannah Wigger

Sheppard Mullin Richter & Hampton LLP

2099 Pennsylvania Avenue NW

Suite 100

Washington, DC 20006

(202) 747-1900

pwerner@sheppardmullin.com

hwigger@sheppardmullin.com

*Counsel for KBCA*