

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:)	
)	
)	
ELECTRONIC APPLICATION OF DUKE)	CASE NO. 2022-00372
ENERGY KENTUCKY, INC. FOR (1) AN)	
ADJUSTMENT OF ELECTRIC RATES; (2))	
APPROVAL OF NEW TARIFFS; (3))	
APPROVAL OF ACCOUNTING)	
PRACTICES TO ESTABLISH)	
REGULATORY ASSETS AND)	
LIABILITIES; AND (4) ALL OTHER)	
REQUIRED APPROVALS AND RELIEF)	

**KENTUCKY BROADBAND AND CABLE ASSOCIATION’S FIRST REQUESTS FOR
INFORMATION TO DUKE KENTUCKY**

The Kentucky Broadband and Cable Association and its members¹ (“KBCA”), pursuant to the Commission’s December 19, 2023, Order, respectfully submits these initial Requests For Information (“RFI”) to Duke Energy Kentucky, Inc. (“Duke Kentucky”).²

DEFINITIONS

1. The terms “You,” “Your,” and “the Company” refer to Duke Kentucky.
2. The term “KBCA” refers to the Kentucky Broadband and Cable Association.
3. The term “Commission” refers to the Kentucky Public Service Commission.

¹ 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>.

² KBCA filed a petition to intervene in this matter on January 3, 2023, in accordance with the Commission’s scheduling order. The Commission has not yet ruled on that petition.

4. The term “Poles” refers to utility poles in Your pole distribution network in Kentucky that You own or control.

5. The phrase “Pole Attachment Charges” means the proposed attachment charges of \$9.99 per foot for a two-user pole and \$8.61 per foot for three-user pole identified by You in Your Fourth Revised Sheet No. 92.

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. KBCA 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

REQUEST NO. 1.

Explain your basis, including all methodology, steps, and calculations performed, and the source of all inputs or data used in your calculations, to determine Your proposed Pole Attachment Charges identified in Your Fourth Revised Sheet No. 92.

REQUEST NO. 2.

Provide documents sufficient to support the methodology, steps, and calculations identified in Request No. 1, including copies of the source of all inputs or data.

REQUEST NO. 3.

Identify all persons, including consultants and other vendors, who assisted, or were otherwise involved, in the process and approval of establishing Your proposed Pole Attachment Charges. Describe fully the responsibilities of each person identified.

REQUEST NO. 4.

Identify the number of poles reflected each calendar year in Duke Kentucky's continuing property records for Account 364 since 2020.

REQUEST NO. 5.

Provide all of Duke Kentucky's detailed continuing property records for Account 364 for each year from 2020 to present.

REQUEST NO. 6.

Provide any pole survey or inspection data containing data on the height of Duke Kentucky's poles for each year from 2020 to present.

REQUEST NO. 7.

Provide any pole survey or inspection data containing data on the number of Duke Kentucky poles that have two users and the number of Duke Kentucky poles that have three users for each year from 2020 to present.

REQUEST NO. 8.

Provide the following information for Duke Kentucky for the 2020, 2021, and 2022 calendar years:

- a. Total Number of Distribution Poles (including drop and lift poles) (FERC Account 364, or equivalent).
- b. Total Number of Mixed Use (i.e., Joint Transmission/Distribution Poles or Transmission Poles with Distribution Facilities built underneath), if any, for which any costs are booked to Account 364;
- c. Gross Investment in Distribution Poles (including drop and lift poles) (FERC Account 364 of equivalent).
- d. Gross Investment in Electric Plant (FERC Form 1, p. 200 col. B, or equivalent).
- e. Accumulated Depreciation for Electric Plant.
- f. Gross Investment in Electric Distribution Plant.
- g. Accumulated Depreciation for Electric Distribution Plant.
- h. Accumulated Deferred Income Taxes, if any, related to Electric Plant (FERC Accounts 190 and 281-283, or equivalent, including amounts booked to Account 254 relating to the Tax Cut and Jobs Act of 2017).
- i. Total General and Administrative Expenses related to Electric Operations (FERC Form 1, p. 323, line 168 col. B, or equivalent).

- j. Maintenance Expenses related to Electric Distribution Plant.
- k. Maintenance Expenses related to overhead distribution plant (FERC Account 593, or equivalent).
- l. Gross Investment in overhead conductors and devices (FERC Account 365, or equivalent).
- m. Accumulated Depreciation related to services (FERC Account 369, or equivalent).
- n. Accumulated Depreciation Related to poles, towers and fixtures (FERC Account 364, or equivalent).
- o. Accumulated Depreciation related to services (FERC Account 369, or equivalent).
- p. Depreciation Rate for Poles (in FERC Account 364, or equivalent).
- q. Income taxes (FERC Accounts 408.1, 409.1, 410.1, 411.1 and 411.4 or equivalent), if any.
- r. Taxes other than income taxes, if any.
- s. Duke Kentucky's cost of debt, cost of equity, and overall weighted cost of capital.
- t. Any other cost of money claimed by Duke Kentucky.

REQUEST NO. 9.

Provide copies of underlying documentation sufficient to support each of Duke Kentucky's responses to Request No. 8, parts (a)-(t).

REQUEST NO. 10.

Identify Duke Kentucky's total revenues and total pole attachment revenues for each year from 2020 to present.

REQUEST NO. 11.

Identify all of Duke Kentucky's total investments in, and breakdown of, appurtenances (non-pole investment) for each year from 2020 to present, booked to Account 364. These include amounts defined as Items #1-11, 13-19, per 18 CFR Ch 1, Pt. 101 .

REQUEST NO. 12.

Provide copies of underlying documentation sufficient to support Duke Kentucky's response to Request No. 11.

REQUEST NO. 13.

Identify all of Duke Kentucky's make ready reimbursements for each year from 2020 to present.

REQUEST NO. 14.

Provide copies of underlying documentation sufficient to support Duke Kentucky's response to Request No. 13.

REQUEST NO. 15.

For the make ready reimbursements identified in response to Request No. 13, identify the specific FERC accounts to which those reimbursements were booked, and the year they were booked.

REQUEST NO. 16.

If any entity that is attached to Your poles will be subject to different Pole Attachment Charges than those identified in Your Fourth Revised Sheet No. 92, state the charges those entities will incur and the basis of, including any calculations related to, the charges.

REQUEST NO. 17.

Admit that, with respect to pole attachments, in this proceeding You are only seeking to change your Attachment Charges noted in Your Fourth Revised Sheet No. 92, and not any other terms or conditions of pole attachments.

REQUEST NO. 18.

Admit that You filed a new tariff, attached as Exhibit A, to address pole attachment terms and conditions in connection with the Commission's order in *In the Matter of Electronic Investigation Of The Proposed Attachment Tariffs Of Investor Owned Electric Utilities*, Case No. 2022-00105, Order (Dec. 28, 2022), available at https://psc.ky.gov/pscscf/2022%20Cases/2022-00105/20221228_PSC_ORDER.pdf.

Dated: January 11, 2022

Respectfully submitted,

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