COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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

KENTUCKY BROADBAND AND CABLE ASSOCIATION'S POST HEARING DATA REQUESTS TO DUKE KENTUCKY

The Kentucky Broadband and Cable Association and its members¹ ("KBCA"), respectfully submit these Post Hearing Data Requests to Duke Energy Kentucky, Inc. ("Duke Kentucky").

REQUEST NO. 1.

Provide documents sufficient to show the pole height and corresponding investment for each one of the 71 poles identified by Bruce Sailer in his rebuttal testimony as poles that were "unitized during the year 2022 but were not unitized as of 12/31/2021." *See* Sailer Rebuttal Testimony at 14:3-6.

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.

REQUEST NO. 2.

Provide documents sufficient to show the pole height and corresponding investment of each non-

unitized pole installed each year from 2020-2022.

REQUEST NO. 3.

Provide any documents related to Duke's construction guidelines for 50-foot poles, including all

diagrams, guidelines, and other documents illustrating Duke's safety space, clearance, usable

space, and below ground requirements.

Dated: May 16, 2023

Respectfully submitted,

/s/ M. Todd Osterloh

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 (admitted pro hac vice)

Hannah Wigger (admitted pro hac vice)

Maria Laura Coltre (admitted pro hac vice)

Sheppard Mullin Richter & Hampton LLP

2099 Pennsylvania Avenue NW

Suite 100

Washington, DC 20006

(202) 747-1900

pwerner@sheppardmullin.com

hwigger@sheppardmullin.com

mcoltre@sheppardmullin.com

Counsel for KBCA

-2-