

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 SUPPLEMENTAL
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 Supplemental Requests For Information (“RFI”) to Duke Energy Kentucky, Inc. (“Duke Kentucky”).

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

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>.

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.

SUPPLEMENTAL REQUESTS FOR INFORMATION

REQUEST NO. 1.

Please refer to BLS_2, to the tab labeled “LFCR per Order.” The header appearing on Line 5, column F above the rate of return calculation is labeled “Approved Capital Structure Rate of Return.” Please confirm that the 7.526% rate of return identified and derived in this attachment represents the proposed rate of return in Case No. 2022-00372, and not the approved rate of

return. Please also confirm Duke Kentucky's agreement that the rate of return input used to calculate the pole attachment rate charged to attachers will be calculated using the final approved rate of return in this case.

REQUEST NO. 2.

Please refer to KBCA-DR-01-004_Attachment.xlsx. For the various pole categories identified in this attachment, please identify the categories on which third party pole attachments are currently attached, and provide a breakdown of the number of third party attachments on each for the year ending 2021.

REQUEST NO. 3.

Please refer to KBCA DR-1-008, (k). In reference to Maintenance Expenses related to overhead distribution plant (FERC Account 593, or equivalent), please indicate whether any of the amounts booked to Account 593 for the year ending 2021 included any storm related expenses for which Duke Kentucky is seeking regulatory asset treatment, and if so, please identify any amounts subject to expense deferral.

REQUEST NO. 4.

Please refer to KBCA-DR-01-009_Attachment.xlsx. In reference to Tab "M and O," and "N" of the attachment, please provide a detailed explanation of the dollar amounts appearing in the next to last three columns H - J of these Tabs labeled as "rwip_allocation," "end_reserve," and "cor_end_reserve." As part of this explanation, please show how the identified end of year balances have been derived from the beginning year balances based on the application of the applicable life depreciation rate, cost of removal rate, and any retirement or unitization related adjustments.

REQUEST NO. 5.

Please refer to KBCA-DR-01-011_Attachment.xlsx. Confirm that the quantity for “Non-Unitized/estimated retirements” identified in this attachment as of Dec-20, Dec-21, and Dec-22, and noted in the spreadsheet as not finalized, have been included in the pole counts for 35, 40, and 45 feet poles used to calculate the pole attachment rate and reconciled to the numbers of such poles identified in KBCA-DR-01-004_Attachment.xlsx as of year-end 2021. If you cannot so confirm, please identify the number of the “Non-unitized/estimated retirement” units associated with 35, 40, and 45 feet poles.

Dated: February 17, 2023

Respectfully submitted,

/s/ M. Todd Osterloh _____

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