

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY	)	
UTILITIES COMPANY FOR AN ADJUSTMENT	)	
OF ITS ELECTRIC RATES AND APPROVAL OF	)	CASE NO. 2025-00113
CERTAIN REGULATORY AND ACCOUNTING	)	
TREATMENTS	)	

RESPONSE OF
KENTUCKY UTILITIES COMPANY
TO
THE KENTUCKY BROADBAND AND CABLE ASSOCIATION’S
SUPPLEMENTAL REQUEST FOR INFORMATION

DATED JULY 31, 2025

FILED: AUGUST 12, 2025

VERIFICATION

COMMONWEALTH OF KENTUCKY)

COUNTY OF JEFFERSON)

The undersigned, **Chad E. Clements**, being duly sworn, deposes and says that he is the Director – Regulated Utility Tax for PPL Services Corporation and currently provides tax related services to Louisville Gas and Electric Company and Kentucky Utilities Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as a witness, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Chad E. Clements

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 6th day of August 2025.



Brittany Elise Meyer
NOTARY PUBLIC
Commonwealth of Kentucky
Commission Number KYNP87702
My Commission Expires
April 22, 2028

Notary Public

Notary Public ID No. KYNP87702

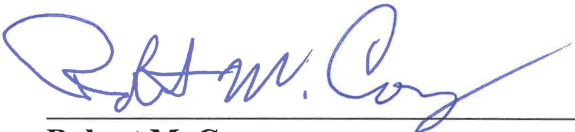
My Commission Expires:

April 22, 2028

VERIFICATION

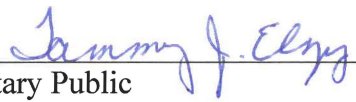
COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Robert M. Conroy**, being duly sworn, deposes and says that he is Vice President, State Regulation and Rates, for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Robert M. Conroy

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 11th day of August 2025.

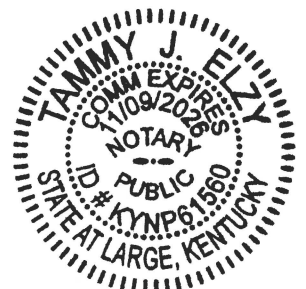


Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026



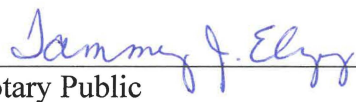
VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Michael E. Hornung**, being duly sworn, deposes and says that he is Manager of Pricing/Tariffs for LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.


Michael E. Hornung

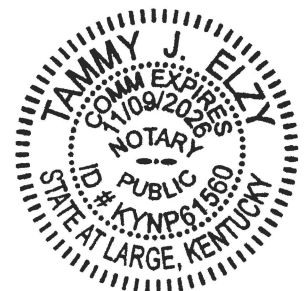
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 11th day of August 2025.


Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026



VERIFICATION

STATE OF VERMONT

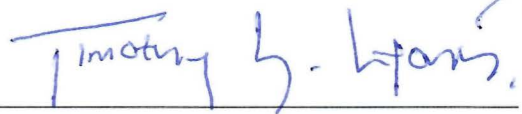
)

COUNTY OF CHITTENDEN

)

)

The undersigned, **Timothy S. Lyons**, being duly sworn, deposes and says that he is a Partner with ScottMadden Inc., that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.



Timothy S. Lyons

On this 11 day of August, 2025, before me, the undersigned notary public, personally appeared **Timothy S. Lyons**, proved to me through satisfactory evidence of identification, which were Drivers license to be the person whose name is signed on the preceding or attached document in my presence.

(seal)




Notary Public Signature

VERIFICATION

COMMONWEALTH OF KENTUCKY)

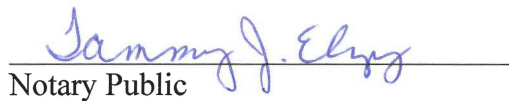
COUNTY OF JEFFERSON)

The undersigned, **Drew T. McCombs**, being duly sworn, deposes and says that he is Director - Regulatory Accounting for PPL Services Corporation and he provides services to Kentucky Utilities Company and Louisville Gas and Electric Company, that he has personal knowledge of the matters set forth in the responses, and that the answers contained therein are true and correct to the best of his information, knowledge, and belief.



Drew T. McCombs

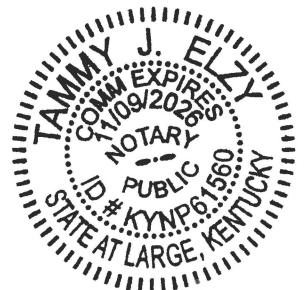
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 11th day of August 2025.


Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026



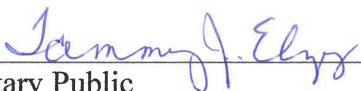
VERIFICATION

COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)

The undersigned, **Peter W. Waldrab**, being duly sworn, deposes and says that he is Vice President, Electric Distribution, for Kentucky Utilities Company and Louisville Gas and Electric Company and an employee of LG&E and KU Services Company, that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge, and belief.


Peter W. Waldrab

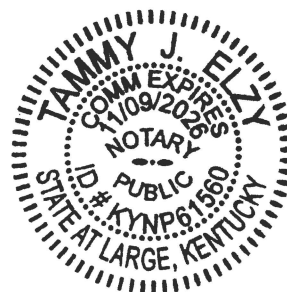
Subscribed and sworn to before me, a Notary Public in and before said County and State, this 11th day of August 2025.


Notary Public

Notary Public ID No. KYNP61560

My Commission Expires:

November 9, 2026



KENTUCKY UTILITIES COMPANY

Response to Kentucky Broadband and Cable Association's Supplemental Request for Information

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-1

Responding Witness: Michael E. Hornung / Timothy S. Lyons

- Q-2-1. Please reference A-2 and the referenced excel PSC1-54 ("2025 PSC DR1 KU LGE Attach to Q54 – Exhibit MEH-1 – PSA Rate Support"). Provide the mathematical/numerical derivation of each forecasted amount in PSC1-54 ("2025 PSC DR1 KU LGE Attach to Q54 – Exhibit MEH-1 – PSA Rate Support"), including but not limited to investment expenses and pole quantities, for the tabs "KU OH," "LG&E OH," and "Combined OH."
- A-2-1. Please refer to the table below. Combined OH reflects the addition of KU and LG&E forecast amounts.

Forecast Category	Derivation
Pole Quantity	Based on installed poles as of January 31, 2025. See tab KU E364.
Pole Gross Plant	Based on installed pole cost as of January 31, 2025. See tab KU E364.
Acct 364	From Asset Accounting, Financial Planning, and Budgeting
Accumulated Depreciation	From Asset Accounting, Financial Planning, and Budgeting
ADIT	Estimated. See tab ADIT.
Rate Base	Sum of Acct 364, AD, ADIT, CWC, and Common Plant
Maintenance (593)	From Financial Planning and Budgeting
Maintenance (593001)	From Financial Planning and Budgeting. See tab LNL Pivot
Labor (593001)	Labor Portion of Maintenance. See tab LNL Pivot
Tree Trimming	From Financial Planning and Budgeting. See tab LNL Pivot
Tree Trimming Labor	Labor Portion of Tree Trimming. See tab LNL Pivot
Depreciation Expense	From Asset Accounting, Financial Planning, and Budgeting
Property Taxes	Based on tax rate of 1.60 percent times net plant
Total Labor	From Financial Planning and Budgeting.
Total A&G Expense	From Financial Planning and Budgeting.

KENTUCKY UTILITIES COMPANY

Response to Kentucky Broadband and Cable Association's Supplemental Request for Information

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-2

Responding Witness: Michael E. Hornung / Timothy S. Lyons

Q-2-2. Please reference A-2 and the referenced excel PSC1-54 ("2025 PSC DR1 KU LGE Attach to Q54 – Exhibit MEH-1 – PSA Rate Support"). The data supporting KU and LG&E's rate calculations is in tabs labeled (in part) "OH." Please state the meaning of "OH," and confirm that KU and LG&E are relying solely on data, costs, and pole counts for poles in Kentucky in calculating their Pole Attachment Charges.

A-2-2. "OH" means "overhead" (as distinguished from "UG" which is "underground") attachments. The analysis inadvertently includes Virginia pole costs and number of poles. Removing the Virginia data changes the average installed cost per pole and charges per pole as shown in the table below. See attachment being provided in a separate file.

Description	35'		40'		45'		Total
Filed							
Average Installed Cost	\$	50.07	\$	100.62	\$	212.87	\$ 114.31
Pole Attachment Rate	\$	3.80	\$	7.64	\$	16.16	\$ 8.68
Two-User Pole Rate						\$	10.13
Three-User Pole Rate						\$	10.46
Weighted Pole Rate						\$	10.29
Revised with VA Data Removed							
Average Installed Cost	\$	50.91	\$	100.95	\$	214.03	\$ 114.97
Pole Attachment Rate	\$	3.87	\$	7.66	\$	16.25	\$ 8.73
Two-User Pole Rate						\$	10.23
Three-User Pole Rate						\$	10.48
Weighted Pole Rate						\$	10.35

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-3

Responding Witness: Michael E. Hornung / Timothy S. Lyons

Q-2-3. Please reference A-2. Explain the basis for using projected numbers for the year ending December 31, 2026, to calculate Your Pole Attachment Charges, rather than historical data, especially in light of *Order 251's*¹ admonition that “the various cost factors needed to apply the formula should be readily available public information, such as that disclosed in the utility’s required annual reports to the Commission or other public agencies,” and the pole rate methodology “shall be . . . the embedded” – not projected – “cost of an average bare pole.”

A-2-3. This request is inaccurate in several respects.

First, based on the citation provided, the request appears to cite the incorrect Administrative Case No. 251 Order.²

Second, the correct Administrative Case No. 251 Order is consistent with using projected data. The request’s first quotation omits important text:

Ideally, the various cost factors needed to apply the formula should be readily available public information, such as that disclosed in the utility’s required annual reports to the Commission or other public agencies. *When this is not the case, we find that each utility shall file with its proposed tariffs the*

¹ See *In The Matter Of The Adoption Of A Standard Methodology For Establishing Rates For CATV Pole Attachments*, Administrative Case No. 251, Order at 7 (K.P.S.C. 1982).

² The request provides an incomplete citation (emphasis added): “*In The Matter Of The Adoption Of A Standard Methodology For Establishing Rates For CATV Pole Attachments*, Administrative Case No. 251, Order at 7 (**K.P.S.C. 1982**).” The Commission issued numerous Order in Administrative Case No. 251 in 1982. Based on the page citation, it appears KBCA cited to the Order issued August 12, 1982. But on September 17, 1982, the Commission issued an Order replacing the August 12, 1982 Order in its entirety. *The Adoption of a Standard Methodology for Establishing Rates for CATV Pole Attachments*, Admin. Case No. 251, Order at 1 (Ky. PSC Sept. 17, 1982) (“This Order incorporates the modifications and points of clarification which the Commission finds appropriate after consideration of the above motions and petitions, and replaces, in its entirety, the Order of August 12, 1982.”).

*source and justification for cost factors used in applying the formula to compute its rate to the CATV operator.*³

Third, in ratemaking, “embedded” is not inconsistent with “forecast” or “projected”; rather, it is used in contradistinction to “marginal,” and it is fully consistent with using a forecasted test year.⁴ Moreover, the Commission’s regulations provide for forecasted test year ratemaking, and they have since 1993.⁵

Fourth and finally, the Company’s pole attachment charges reflect the embedded cost of an average pole as of January 31, 2025. The forecast data are related to O&M expenses and indirect pole costs, not pole costs.

³ *The Adoption of a Standard Methodology for Establishing Rates for CATV Pole Attachments*, Admin. Case No. 251, Order at 8 (Ky. PSC Sept. 17, 1982) (emphasis added).

⁴ See, e.g., NARUC Electric Utility Cost Allocation Manual at 15 (Jan. 1992) (“It is important to note that the difference between an embedded cost of service study and a marginal cost of service study lies in their different concepts of cost. The embedded cost study uses the accounting costs on the company’s books during the test year as the basis for the study. In contrast, the marginal cost study estimates the resource costs of the utility in providing the last unit of production.”); *id.* at 17 (“Embedded cost studies rely on the company’s historical records or projections of these records, whose accuracy can be audited and verified either at the time of filing or at the end of the period projected.”).

⁵ 19 Ky. R. 2047 *et seq.*

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-4

Responding Witness: Drew T. McCombs

Q-2-4. Please confirm that as of Your most recent FERC Form 1 report (year end 2024), KU and LG&E filed separate FERC Form 1 reports. If KU and LG&E did not file separate FERC Form 1 reports for year end 2024, please state the last year in which KU and LG&E filed separate FERC Form 1 reports.

A-2-4. Confirmed.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-5

Responding Witness: Drew T. McCombs

Q-2-5. Please confirm that as of Your most recent Annual Report to the Kentucky Public Service Commission (year end 2024), KU and LG&E filed separate Annual Reports. If KU and LG&E did not file separate Annual Reports for year end 2024, please state the last year in which KU and LG&E filed separate Annual Reports.

A-2-5. Confirmed.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-6

Responding Witness: Michael E. Hornung

Q-2-6. Please reference A-2 and the referenced excel PSC1-54 ("2025 PSC DR1 KU LGE Attach to Q54 – Exhibit MEH-1 – PSA Rate Support"). Please provide a computation of the rates in tabs "Combined OH," "LG&E OH," and "KU OH" based on year end 2024 data, including all methodology, steps, and calculations performed, and the source of all inputs or data used in Your calculations, to determine such rates.

A-2-6. The Company has not performed the specific calculation.

.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-7

Responding Witness: Timothy S. Lyons

Q-2-7. Please reference A-3. Identify all other jurisdictions in which Tim Lyons has provided a pole attachment calculation. Please specify any cases in which a public utilities commission or court has adopted his pole attachment calculation.

A-2-7. There are none.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-8

Responding Witness: Drew T. McCombs

- Q-2-8. Please reference A-10 and related attachments. For the year 2025 (spreadsheet 2025 KBCA DR1 LGE Attach 6 to Q10 Distribution Pole Account 364-2025 and spreadsheet 2025 KBCA DR1 KU Attach 6 to Q10 Distribution Pole Account 364-2025), please state whether Your attached spreadsheets show forecasted or historical data. If they use historical data, please state the "as of" date the assets were valued for the 2025 data (given that the year is not yet over). If they use forecasted data, in whole or in part, explain the mathematical/numerical derivation of each forecasted amount.
- A-2-8. The information provided for 2025 in Attach 6 to Q10 Distribution Pole Account 364-2025 was historical data as of May 31, 2025.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-9

Responding Witness: Drew T. McCombs

Q-2-9. Please provide the gross plant investment for accounts 369 and 364 for each year from 2020 to present for both KU and LG&E.

A-2-9. The gross plant investment for Kentucky only assets in accounts 369 and 364 are as follows:

	KY Investment 364	KY Investment 369
2020	\$ 430,438,336.37	\$ 125,101,562.48
2021	457,658,418.04	134,685,239.72
2022	468,408,645.10	146,434,789.98
2023	488,938,617.69	156,847,934.62
2024	530,583,576.83	168,741,726.08
June-25	540,658,610.68	182,980,328.21

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-10

Responding Witness: Drew T. McCombs

Q-2-10. Please provide the accumulated depreciation reserve for account 365 for each year from 2020 to present for both KU and LG&E.

A-2-10.

Year	Depreciation Reserve
2020	\$96,136,743.11
2021	92,154,901.38
2022	83,343,136.35
2023	78,526,131.62
2024	74,157,785.63
Jun-25	75,570,042.19

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-11

Responding Witness: Robert M. Conroy

Q-2-11. Please provide Your last authorized rate of return and a copy of the associated Commission decision authorizing that rate of return.

A-2-11. See the response to DOD/FEA 1-14.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-12

Responding Witness: Chad E. Clements / Drew T. McCombs / Peter W. Waldrab

Q-2-12. Please reference A-13. Identify any items in which the numbers/data provided in response to any part of REQUEST NO. 13 deviate from KU or LG&E's FERC Form 1 filings for 2024, and the reason for that deviation.

A-2-12.

- a. Not reported in the FERC Form 1.
- b. Not reported in the FERC Form 1.
- c. Not reported in the FERC Form 1.
- d. Not consistent with the FERC Form 1 because the response includes amounts for distribution poles only and excludes non-pole amounts (such as appurtenances) and only includes assets in Kentucky.
- e. Consistent with the FERC Form 1 with the exception of 2025 amounts as these have not yet been reported.
- f. Consistent with the FERC Form 1 with the exception of 2025 amounts as these have not yet been reported.
- g. Consistent with the FERC Form 1 with the exception of 2025 amounts as these have not yet been reported.
- h. Consistent with the FERC Form 1 with the exception of 2025 amounts as these have not yet been reported.
- i. Consistent with the FERC Form 1 with the exception of 2025 amounts as these have not yet been reported.
- j. Consistent with the FERC Form 1 with the exception of 2025 amounts as these have not yet been reported.
- k. Consistent with the FERC Form 1 with the exception of 2025 amounts as these have not yet been reported.
- l. Consistent with the FERC Form 1 with the exception of 2025 amounts as these have not yet been reported.
- m. Not consistent with the FERC Form 1 because the Form page includes additional expenses that were not requested.

- n. Not consistent with the FERC Form 1 because the response only includes assets in Kentucky.
- o. Not reported in the FERC Form 1.
- p. Not reported in the FERC Form 1.
- q. Not reported in the FERC Form 1.
- r. Not reported in the FERC Form 1.
- s. Consistent with the FERC Form 1 with the exception of 2025 amounts as these have not yet been reported.
- t. Consistent with the FERC Form 1 with the exception of 2025 amounts as these have not yet been reported.
- u. Not reported in the FERC Form 1.
- v. Not reported in the FERC Form 1.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-13

Responding Witness: Drew T. McCombs / Peter W. Waldrab

Q-2-13. Please reference A-13(b). Identify any costs associated with transmission poles with distribution underneath (such as appurtenances or any other non-pole item) recorded in account 364.

A-2-13. None.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-14

Responding Witness: Drew T. McCombs / Peter W. Waldrab

Q-2-14. Please reference A-13(c). Identify any costs associated with privately owned poles (such as appurtenances or any other non-pole item) recorded in account 364.

A-2-14. None.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-15

Responding Witness: Drew T. McCombs / Peter W. Waldrab

- Q-2-15. Please reference A-13(d). Confirm the numbers reported in Your response are the same as those reported in the filed FERC Form 1 for the same year; if the numbers are not the same, identify the numbers reported in the filed FERC form 1 and explain the basis for the numbers provided in Your response.
- A-2-15. The amounts provided in response to KBCA 1-13(d) were Kentucky only amounts and includes pole investment only. Amounts reported in the FERC Form 1 include amounts from our jurisdictions outside of Kentucky and include both pole and non-pole investment in Account 364.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-16

Responding Witness: Chad E. Clements

Q-2-16. Please reference A-13(i). You provided numbers for "Total Electric Plant" ADIT.
Please provide numbers for Total Utility Plant ADIT as well.

A-2-16. Total Electric Plant ADIT is equivalent to Total Utility Plant ADIT for KU.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-17

Responding Witness: Chad E. Clements

- Q-2-17. Please reference A-13(i). Please confirm that the amounts identified as ASC 740-Income Taxes recorded in Accounts 182 and 254 are not included in the amounts shown under Accounts 190, 282 and 283. If they are, identify any ASC 740 amounts included in accounts 190, 282 or 283, and identify the specific account in which they are included.
- A-2-17. See attachment being provided in a separate file. The ASC 740 – Income Taxes in Account 182 and 254 have direct corresponding balances in Accounts 190, 282, and 283. See attachment for specific accounts and balances showing the ASC 740 Regulatory Tax adjustments included in accounts 190, 282, and 283 that correspond with ASC 740 – Income Taxes in Accounts 182 and 254.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-18

Responding Witness: Drew T. McCombs

Q-2-18. Please reference 13(l)-(m) and related attachments (2025 KBCA DR1 KU Attach to Q13 (l-m) – FERC 593 Maint of OH Lines and 2025 KBCA DR1 LGE Attach to Q13 (l-m) – FERC 593 Maint of OH Lines).

To KU: According to Your attachment, for 2024, of the \$22,247,777 reported to FERC, \$479,195 related to a prior year amortization. Please confirm none of the remaining \$21,768,582 booked to Account 593 for 2024 is subject to amortized treatment recorded as a regulatory asset and for which cost recovery for ratemaking purposes is deferred to a future year. If it is, state the amount subject to amortized treatment and the years those costs are scheduled to be recovered for ratemaking purposes.

To LG&E: According to Your attachment, for 2024, of the \$14,616,861 reported to FERC, \$731,965 related to a prior year amortization. Please confirm none of the \$13,884,896 booked to Account 593 for 2024 is subject to amortized treatment recorded as a regulatory asset and for which cost recovery for ratemaking purposes is deferred to a future year. If it is, state the amount subject to amortized treatment and the years those costs are scheduled to be recovered for ratemaking purposes.

A-2-18. Confirmed.

KENTUCKY UTILITIES COMPANY

**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information**

Dated July 31, 2025

Case No. 2025-00113

Question No. 2-19

Responding Witness: Drew T. McCombs / Peter W. Waldrab

Q-2-19. Please reference A-20. Identify the amounts related to make ready reimbursements from third party attachers that were credited to accounts used in the pole rate formula, including but not limited to accounts 364 or 593, for the years 2020-present.

A-2-19. All of the amounts provided in 2025 KBCA DR1 KU Attach to Q18 – Make-Ready Reimbursements were credited to accounts used in the pole rate formula. Specifically, these amounts were credited to account 107 (Construction work in progress) and account 108 (Accumulated provision for depreciation of electric utility plant). In calculating Rate PSA, these amounts (along with other common expenses and plant) were allocated to the three sizes of poles according to the allocation factors identified in 2025 PSC DR1 KU LGE Attach to Q54 - Exhibit MEH-1 – PSA Rate Support.

KENTUCKY UTILITIES COMPANY**Response to Kentucky Broadband and Cable Association's Supplemental Request
for Information****Dated July 31, 2025****Case No. 2025-00113****Question No. 2-20****Responding Witness: Peter W. Waldrab**

Q-2-20. Please reference A-21. The data You provided in response to REQUEST NO. 21 appears to be combined data for KU & LG&E. Please provide separate, disaggregated data for each company showing the number and percentage of poles that were 30' or less, 35', 40' 45', 50', 55', 60', 65', 70', or 75' or greater for 2020-2025.

A-2-20. See the tables below:

2020	Company					
Height	KU		LGE		Grand Total	
35	68,491	18.1%	20444	14.5%	88,935	17.1%
40	151,208	40.0%	54174	38.3%	205,382	39.6%
45	67,838	18.0%	26130	18.5%	93,968	18.1%
50	15,287	4.0%	9184	6.5%	24,471	4.7%
55	3,928	1.0%	4476	3.2%	8,404	1.6%
60	2,487	0.7%	2253	1.6%	4,740	0.9%
65	2,477	0.7%	1767	1.2%	4,244	0.8%
70	1,874	0.5%	1145	0.8%	3,019	0.6%
30 Or Less	60,833	16.1%	18389	13.0%	79,222	15.3%
75 Or Greater	1,730	0.5%	2330	1.6%	4,060	0.8%
unset	1,517	0.4%	1174	0.8%	2,691	0.5%
Grand Total	377,670	72.7%	141466	27.3%	519,136	

2021	Company					
Height	KU		LGE		Grand Total	
35	67,979	18.0%	20,358	14.4%	88,337	17.0%
40	151,058	39.9%	53,676	37.9%	204,734	39.4%
45	69,151	18.3%	26,697	18.9%	95,848	18.4%
50	15,663	4.1%	9,310	6.6%	24,973	4.8%
55	4,003	1.1%	4,514	3.2%	8,517	1.6%
60	2,496	0.7%	2,275	1.6%	4,771	0.9%
65	2,498	0.7%	1,774	1.3%	4,272	0.8%
70	1,904	0.5%	1,146	0.8%	3,050	0.6%
30 Or Less	60,476	16.0%	18,248	12.9%	78,724	15.1%
75 Or Greater	1,759	0.5%	2,327	1.6%	4,086	0.8%
unset	1,555	0.4%	1,115	0.8%	2,670	0.5%
Grand Total	378,542	72.8%	141,440	27.2%	519,982	

2022	Company					
Height	KU		LGE		Grand Total	
35	67,606	17.8%	19,700	14.3%	87,306	16.9%
40	151,063	39.8%	50,758	36.9%	201,821	39.0%
45	70,401	18.5%	26,709	19.4%	97,110	18.8%
50	16,026	4.2%	9,368	6.8%	25,394	4.9%
55	4,118	1.1%	4,585	3.3%	8,703	1.7%
60	2,504	0.7%	2,317	1.7%	4,821	0.9%
65	2,487	0.7%	1,790	1.3%	4,277	0.8%
70	1,909	0.5%	1,145	0.8%	3,054	0.6%
30 Or Less	60,233	15.9%	17,651	12.8%	77,884	15.1%
75 Or Greater	1,802	0.5%	2,324	1.7%	4,126	0.8%
unset	1,547	0.4%	1,122	0.8%	2,669	0.5%
Grand Total	379,696	73.4%	137,469	26.6%	517,165	

2023	Company					
Height	KU		LGE		Grand Total	
35	66,955	17.6%	19,601	14.2%	86,556	16.7%
40	150,960	39.6%	50,318	36.6%	201,278	38.8%
45	72,020	18.9%	27,174	19.8%	99,194	19.1%
50	16,528	4.3%	9,449	6.9%	25,977	5.0%
55	4,230	1.1%	4,664	3.4%	8,894	1.7%
60	2,532	0.7%	2,353	1.7%	4,885	0.9%
65	2,502	0.7%	1,780	1.3%	4,282	0.8%
70	1,917	0.5%	1,141	0.8%	3,058	0.6%
30 Or Less	59,979	15.7%	17,529	12.7%	77,508	14.9%
75 Or Greater	1,805	0.5%	2,352	1.7%	4,157	0.8%
unset	1,537	0.4%	1,209	0.9%	2,746	0.5%
Grand Total	380,965	73.5%	137,570	26.5%	518,535	

2024	Company					
Height	KU		LGE		Grand Total	
35	66,497	17.4%	19,574	14.2%	86,071	16.6%
40	150,890	39.5%	49,779	36.2%	200,669	38.6%
45	73,459	19.2%	27,634	20.1%	101,093	19.4%
50	17,020	4.5%	9,639	7.0%	26,659	5.1%
55	4,307	1.1%	4,716	3.4%	9,023	1.7%
60	2,514	0.7%	2,341	1.7%	4,855	0.9%
65	2,579	0.7%	1,768	1.3%	4,347	0.8%
70	1,915	0.5%	1,141	0.8%	3,056	0.6%
30 Or Less	59,795	15.6%	17,390	12.6%	77,185	14.8%
75 Or Greater	1,858	0.5%	2,397	1.7%	4,255	0.8%
unset	1,558	0.4%	1,220	0.9%	2,778	0.5%
Grand Total	382,392	73.5%	137,599	26.5%	519,991	
2025	Company					
Height	KU		LGE		Grand Total	
35	65,530	17.1%	19,441	14.1%	84,971	16.3%
40	150,195	39.1%	48,936	35.5%	199,131	38.2%
45	75,808	19.7%	28,497	20.7%	104,305	20.0%
50	17,948	4.7%	9,891	7.2%	27,839	5.3%
55	4,480	1.2%	4,798	3.5%	9,278	1.8%
60	2,622	0.7%	2,380	1.7%	5,002	1.0%
65	2,636	0.7%	1,779	1.3%	4,415	0.8%
70	1,923	0.5%	1,136	0.8%	3,059	0.6%
30 Or Less	59,318	15.4%	17,267	12.5%	76,585	14.7%
75 Or Greater	1,859	0.5%	2,413	1.8%	4,272	0.8%
unset	1,609	0.4%	1,213	0.9%	2,822	0.5%
Grand Total	383,928	73.6%	137,751	26.4%	521,679	