

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 CERTAIN
REGULATORY AND ACCOUNTING
TREATMENTS

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) CASE NO. 2025-00113
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In the Matter of:

ELECTRONIC APPLICATION OF
LOUISVILLE GAS AND ELECTRIC
COMPANY FOR AN ADJUSTMENT OF ITS
ELECTRIC AND GAS RATES, AND
APPROVAL OF CERTAIN REGULATORY
AND ACCOUNTING TREATMENTS

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**KENTUCKY BROADBAND AND CABLE ASSOCIATION’S SUPPLEMENTAL
REQUESTS FOR INFORMATION TO KENTUCKY UTILITIES COMPANY AND
LOUISVILLE GAS AND ELECTRIC COMPANY**

Pursuant to the Commission’s June 18, 2025, Order, The Kentucky Broadband and Cable Association and its members¹ (“KBCA”), respectfully submit these Supplemental Requests for Information to Kentucky Utilities Company (“KU”) and Louisville Gas & Electric Company (LG&E).

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

DEFINITIONS

1. The terms “You,” “Your,” and “the Company” refer to KU and LG&E.
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.
5. The phrase “Pole Attachment Charges” means the proposed pole and structure attachment charges of \$10.13 per foot for a two-user pole and \$10.46 per foot for three-user pole identified by You in Your Original Sheet No. 40.3.

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.

6. References to answers (A-[number]) refer to KU and LG&E's answers to the Kentucky Broadband and Cable Association's initial Requests For Information.

SUPPLEMENTAL REQUESTS FOR INFORMATION

REQUEST NO. 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."

REQUEST NO. 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.

REQUEST NO. 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*'s² 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.”

REQUEST NO. 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.

REQUEST NO. 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.

REQUEST NO. 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.

² 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).

REQUEST NO. 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.

REQUEST NO. 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.

REQUEST NO. 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.

REQUEST NO. 2-10.

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

REQUEST NO. 2-11.

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

REQUEST NO. 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.

REQUEST NO. 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.

REQUEST NO. 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.

REQUEST NO. 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.

REQUEST NO. 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.

REQUEST NO. 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.

REQUEST NO. 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.

REQUEST NO. 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.

REQUEST NO. 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.

Dated: July 31, 2025

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

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