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) (CASE NO. 2025-00113
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) (CASE NO. 2025-00114

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

Pursuant to the Commission's August 27, 2025, Order, The Kentucky Broadband and Cable Association and its members¹ ("KBCA"), respectfully submit these Second 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.

SUPPLEMENTAL REQUESTS FOR INFORMATION

REQUEST NO. 3-1.

Please reference the testimony of Patricia Kravtin and Your response to KBCA Data Request 2-6. Having reviewed Ms. Kravtin's testimony and calculations, please provide any computations of Pole Attachment Charges based on year end 2024 data, or any other rate calculated in response to Ms. Kravtin's testimony, including all methodology, steps, and calculations performed, and the source of all inputs or data used in Your calculations, to determine such rates. Dated: September 12, 2025

Respectfully submitted,

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