

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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) CASE NO. 2025-00114
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**KENTUCKY BROADBAND AND CABLE ASSOCIATION’S 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 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.

REQUESTS FOR INFORMATION

REQUEST NO. 1.

Explain your basis, including all methodology, steps, and calculations performed, and the source of all inputs or data used in your calculations, to determine Your proposed Pole Attachment Charges identified in Your Original Sheet No. 40.3.

REQUEST NO. 2.

Provide documents sufficient to support the methodology, steps, and calculations identified in Request No. 1, including copies of the source of all inputs or data.

REQUEST NO. 3.

Identify all persons, including consultants and other vendors, who assisted, or were otherwise involved, in the process and approval of establishing Your proposed Pole Attachment Charges. Describe fully the responsibilities of each person identified.

REQUEST NO. 4.

Explain the basis, including all methodology, steps, and calculations performed, and the source of all inputs or data used in your calculations, for Mr. Hornung's statement that "the current rate of \$7.25 does not reflect the Companies' cost of service." Hornung Direct Testimony, page 12.

REQUEST NO. 5.

Explain the methodology, steps, and calculations performed to calculate Your cost of service for pole attachments.

REQUEST NO. 6.

Explain the basis, including all methodology, steps, and calculations performed, and the source of all inputs or data used in your calculations, for Mr. Hornung's statement that "[t]he new rates proposed by the Companies reflect our current cost of service for providing pole attachments." Hornung Direct Testimony, page 12.

REQUEST NO. 7.

Explain the basis, including all methodology, steps, and calculations performed, and the source of all inputs or data used in your calculations, for Mr. Hornung's statement that "the proposed bifurcation of rates will more closely align with the Commission's order in Administrative Case No. 251." Hornung Direct Testimony, page 12.

REQUEST NO. 8.

Explain the basis, including all methodology, steps, and calculations performed, and the source of all inputs or data used in your calculations, for Mr. Hornung's statement that "the Companies' cost basis is higher for the three-user poles." Hornung Direct Testimony, page 13.

REQUEST NO. 9.

Identify the number of poles reflected each calendar year in KU's and LG&E's continuing property records for Account 364 since 2020.

REQUEST NO. 10.

Provide all of KU's and LG&E's detailed continuing property records for Account 364 for each year from 2020 to present.

REQUEST NO. 11.

Provide any pole survey or inspection data containing data on the height of KU's and LG&E's poles for each year from 2020 to present.

REQUEST NO. 12.

Provide any pole survey or inspection data containing data on the number of KU and LG&E poles that have two users and the number of KU and LG&E poles that have three users for each year from 2020 to present.

REQUEST NO. 13.

Provide the following information for KU and LG&E for the 2022, 2023, 2024, and 2025 calendar years:

- a. Total Number of Distribution Poles (including drop and lift poles) (FERC Account 364, or equivalent).
- b. Total Number of Mixed Use (i.e., Joint Transmission/Distribution Poles or Transmission Poles with Distribution Facilities built underneath), if any, for which any costs are booked to Account 364;
- c. Total Number of Privately Owned Poles, if any, for which any costs are booked to Account 364;
- d. Gross Investment in Distribution Poles (including drop and lift poles) (FERC Account 364 of equivalent).
- e. Gross Investment in Electric Plant (FERC Form 1, p. 200 col. B, or equivalent).
- f. Accumulated Depreciation for Electric Plant.
- g. Gross Investment in Electric Distribution Plant.
- h. Accumulated Depreciation for Electric Distribution Plant.

- i. Accumulated Deferred Income Taxes, if any, related to Electric Plant (FERC Accounts 190 and 281-283, or equivalent, including amounts booked to Account 254 relating to the Tax Cut and Jobs Act of 2017).
- j. Total General and Administrative Expenses related to Electric Operations (FERC Form 1, p. 323, line 168 col. B, or equivalent).
- k. Maintenance Expenses related to Electric Distribution Plant.
- l. Maintenance Expenses related to overhead distribution plant (FERC Account 593, or equivalent).
- m. Maintenance expenses recorded in FERC Account 593 subject to amortized or deferred recovery and/or subject to reimbursement.
- n. Gross Investment in overhead conductors and devices (FERC Account 365, or equivalent).
- o. Accumulated Depreciation related to services (FERC Account 369, or equivalent).
- p. Accumulated Depreciation Related to poles, towers and fixtures (FERC Account 364, or equivalent).
- q. Accumulated Depreciation related to services (FERC Account 369, or equivalent).
- r. Depreciation Rate for Poles (in FERC Account 364, or equivalent).
- s. Income taxes (FERC Accounts 408.1, 409.1, 410.1, 411.1 and 411.4 or equivalent), if any.
- t. Taxes other than income taxes, if any.
- u. Cost of debt, cost of equity, and overall weighted cost of capital.

v. Any other cost of money claimed by KU and/or LG&E.

REQUEST NO. 14.

Provide copies of underlying documentation sufficient to support each of KU's and LG&E's responses to Request No. 13, parts (a)-(v).

REQUEST NO. 15.

Identify KU's and LG&E's total revenues and total pole attachment revenues for each year from 2020 to present.

REQUEST NO. 16.

Identify all of KU's and LG&E's total investments in, and breakdown of, appurtenances (non-pole investment) for each year from 2020 to present, booked to Account 364. These include amounts defined as Items #1-11, 13-19, per 18 CFR Ch 1, Pt. 101.

REQUEST NO. 17.

Provide copies of underlying documentation sufficient to support KU's and LG&E's responses to Request No. 16.

REQUEST NO. 18.

Identify all of KU's and LG&E's make ready reimbursements for each year from 2020 to present.

REQUEST NO. 19.

Provide copies of underlying documentation sufficient to support KU's and LG&E's responses to Request No. 18.

REQUEST NO. 20.

For the make ready reimbursements identified in response to Request No. 18, identify the specific FERC accounts to which those reimbursements were booked, and the year they were booked.

REQUEST NO. 21.

For the years 2020-2025, state the number and percentage of KU's and LG&E's poles that were 30' or less, 35', 40' 45', 50', 55', 60', 65', 70', or 75' or greater.

REQUEST NO. 22.

If any entity that is attached to Your poles will be subject to different Pole Attachment Charges than those identified in Your Original Sheet No. 40.3, state the charges those entities will incur and the basis of, including any calculations related to, the charges.

REQUEST NO. 23.

Admit that, with respect to pole attachments, in this proceeding You are only seeking to change your Attachment Charges noted in Your Original Sheet No. 40.3, and not any other terms or conditions of pole attachments.

Dated: July 3, 2025

Respectfully submitted,

/s/ M. Todd Osterloh

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