

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 RESPONSES TO DATA
REQUESTS FROM COMMISSION STAFF**

The Kentucky Broadband and Cable Association and its members¹ (“KBCA”), respectfully submit these Responses to the Data Requests issues by the Public Service Commission Staff.

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>.

REQUEST 1-1: Refer to the Direct Testimony of Patricia D. Kravtin (Kravtin Direct Testimony), Exhibits 3 and 5. Provide Exhibits 3 and 5 in Excel spreadsheet format with all formulas, columns, and rows unprotected and fully accessible and all references clearly and correctly labeled.

Response: Please see the attached files.

Witness: Patricia Kravtin

REQUEST 1-2: Refer to the Kravtin Direct Testimony, page 15. Explain whether KBCA believes the ultimate return on investment to be used in the pole attachment rate calculation should be the amount allowed in the utility's last rate case or the amount ultimately approved by the Commission in this proceeding.

Response: Ms. Kravtin recommends a rate of return input that is compliant with the applicable law set forth in Admin. 251 regarding the "cost of money" factor:

"There should be included in the "cost of money" factor a reasonable amount representing a return on the utility's investment in the poles. For convenience and certainty of computation, the Commission finds that this return should be equal to the return on investment (or margin) allowed in the utility's last rate case."

Admin. 251 at 12. Ms. Kravtin's recommended just and reasonable pole rate strictly complies with the language of Admin. 251 by using "the return on investment (or margin) allowed in the utility's last rate case." *Id.* However, where the pole rate is being determined in the context of a new rate case, Ms. Kravtin believes the Commission would have the discretion to allow the utility to use the "amount ultimately approved by the Commission in this proceeding." For the reasons described in Ms. Kravtin's Direct Testimony at 16-17, Ms. Kravtin believes the utility's use of a projected or forecasted rate of return would not be compliant with the language governing the rate of return in Admin. 251 requiring "convenience and certainty of computation," or the requirement that the pole rate be calculated using "embedded cost[s]." Admin. 251 at 8 & 12.

Witness: Patricia Kravtin.

Dated: September 23, 2025

Respectfully submitted,



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