

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	CASE NO.
PROPOSED POLE ATTACHMENT TARIFFS OF)	2022-00108
INCUMBENT LOCAL EXCHANGE CARRIERS)	

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO WINDSTREAM KENTUCKY WEST, LLC

Windstream Kentucky West, LLC (Windstream West), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on June 2, 2022. The Commission directs Windstream West to the Commission's July 22, 2021 Order in Case No. 2020-00085¹ regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made and shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Windstream West shall make timely amendment to any prior response if Windstream West obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Windstream West fails or refuses to furnish all or part of the requested information, Windstream West shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Windstream West shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to Windstream West's response to Commission Staff's First Request for Information (Staff's First Request) Item 1, regarding Windstream West's current pole attachment tariff. Explain when Windstream West plans to revise its tariff to reflect the revised rules.

2. Refer to Windstream West's response to Staff's First Request, Item 2(a), regarding the 1.5 percent interest per month to be charged to unpaid balances. Explain

how charging an interest charge is a more efficient method for collecting late payments than charging a late payment fee.

3. Refer to Windstream West's response to Staff's First Request, Items 4(a) through (d), regarding the One-Time Agreement Fee, Application for Pole License Fee, Pole Removal Verification Fee, and Additional Field or Engineering Fee. Provide detailed cost support for these four fees.

4. Refer to Windstream West's response to Staff's First Request, Item 6(a) in which Windstream West failed to respond to the request. Provide a response to the initial request and an explanation of why Windstream West failed to respond initially.

5. Refer to Windstream West's response to Staff's First Request, Items 6(b) through 8(b). Explain when Windstream West plans to file the confidential supplements discussed in Windstream West's responses.

6. Refer to Windstream West's response to Staff's First Request, Item 10.

a. Describe any defects that would cause a pole to be identified for replacement.

b. If a pole has a defect that requires replacement but does not present a safety issue requiring its replacement to be escalated, explain the process for replacing the pole and the typical timeline of each step from the time the defect is identified until the pole is replaced.

c. Explain the process and any documentation if an issue with a pole is identified but it is later determined that the pole does not need to be replaced, including whether the pole is scheduled for a follow-up inspection.

d. State whether Windstream West performs any systematic, periodic inspections of its poles beyond inspecting poles when a technician is on sight for another reason. If so, explain that inspection process in detail. If not, explain why Windstream West does perform such inspections.

e. Explain whether and, if so, how Windstream West tracks the age and condition of its poles and makes determinations regarding when poles need to be replaced.

7. Refer to Windstream West's response to objections filed on April 20, 2022, in which Windstream West stated that it is willing to amend its proposed tariff in response to some objections and that it did not respond to objections in circumstances in which it was willing to amend its tariff. Provide a copy of Windstream West's proposed tariff with red line edits addressing such objections.

8. Refer to 807 KAR 5:001, Section 12(d)(2), which requires, *inter alia*, that responses to requests for information shall "include the name of the witness responsible for responding to the questions related to the information provided" and shall be answered under oath or accompanied by a, "signed certification of the preparer or person supervising the preparation of the response on behalf of the person that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry." Windstream West lists no witness responsible for the responses to Items 1 through 9. Windstream West, after the response to Item 10, lists Amanda Brown as a responding witness; however, it is unclear whether Ms. Brown is the witness responsible for responding to all items in the request or only Item 10.

a. Clarify which witnesses are responsible for responding to each item in Staff's First Request; and

b. Provide the oath or verification page required by 807 KAR 5:001, Section 12(d)(2).

9. Identify the total number of poles Windstream West has replaced in Kentucky in each of the last ten years.

10. Provide an estimate of the average cost to perform a make-ready pole replacement, and explain each basis for your response.

11. Other than identifying specific defective poles through inspections that require replacement, state whether you have a policy or practice of replacing poles in a circuit on a periodic basis or as they reach the end of their useful lives and, if so, describe that policy or practice in detail, including how and when (e.g., how far in advance) such replacements such replacements are identified or included in your projected capital spending budget.

12. Describe your recent efforts, if any, to reduce the number of above ground lines, and identify the number of poles that have been eliminated in your system in each of the last ten years because the lines previously attached to those poles were placed underground.

13. Provide any current joint use agreements.



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DATED MAY 19 2022

cc: Parties of Record

Case No. 2022-00108

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