

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	CASE NO.
PROPOSED POLE ATTACHMENT TARIFFS OF)	2022-00107
RURAL LOCAL EXCHANGE CARRIERS)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO RURAL LOCAL EXCHANGE CARRIERS

Ballard Rural Telephone Cooperative Corporation, Inc.; Brandenburg Telephone Company, Inc.; Duo County Telephone Cooperative Corporation, Inc. (Duo County); Foothills Rural Telephone Cooperative Corporation, Inc.; Gearheart Communications Company, Inc.; Highland Telephone Cooperative, Inc.; Logan Telephone Cooperative, Inc. dba LTC Connect; Mountain Rural Telephone Cooperative Corporation; North Central Telephone Cooperative, Inc.; Peoples Rural Telephone Cooperative Corporation, Inc.; South Central Rural Telecommunications Cooperative, Inc. (South Central Telephone); and Thacker Grigsby Telephone Company, Incorporated (collectively, the RLECs), pursuant to 807 KAR 5:001, are each to separately file with the Commission an electronic version of the following information.¹ The information requested is due on May 5, 2022. The Commission directs RLECs to the Commission's July 22, 2021 Order in Case No. 2020-00085² regarding filings with the Commission. Electronic documents shall

¹ Each utility should respond to each question as if the question was directed exclusive to it.

² 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).

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

RLECs shall make timely amendment to any prior response if RLECs obtain 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 RLECs fail or refuse to furnish all or part of the requested information, RLECs 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, RLECs 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 Duo County's proposed tariff, PSC KY No. 2A, Original Page 18-15, 3. Payments, b. Payment of Make Ready Estimates. Explain what "<subsection (2)(b)4. of this section>" refers to.

2. Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18-18 indicating that "[t]he make-ready cost, if any, for a pole that is not a red tagged pole to be replaced with a new Pole to accommodate the new Attacher's attachment shall be charged the Company's cost in accordance with the Company's tariff or a special contract regarding pole attachments between the Company and the new Attacher."

a. Identify where the treatment of such make-ready costs is addressed in the tariff.

b. Explain in detail who is responsible for such make-ready costs pursuant to the terms and conditions of the tariff.

3. Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18-28.

a. Provide support for the per pole survey fee for your system.

b. Explain whether the per pole survey fee is intended to be an estimate of the survey costs that will be trued up in a final bill.

c. Identify the tariff language that indicates when the per pole survey fee must be paid.

4. Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18-28. Also refer to South Central Telephone's current tariff, PSC KY Tariff No. 4, Section 17, Original Sheet No. 16, 17.17 Rental Rate. Explain why the \$2.43 per linear foot of

cable duct charge currently in South Central Telephone's tariff is not included in Duo County's proposed tariff.

5. Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18-28. Explain why the rates for West Kentucky Rural Telephone Cooperative Corporation, Inc. will only be developed upon request.

6. a. Identify each account and subaccount in which the costs of utility poles in service are recorded.

b. Provide a narrative description of the costs that are recorded in each such account, including a description of the type and vintage of poles for which costs are recorded in the account and a description other plant, if any, for which costs are recorded in the account.

c. Provide a spreadsheet showing the plant in service balance of each such account at the end of each of the last three fiscal years.

7. a. Identify each account and subaccount in which accumulated depreciation for poles in service is recorded.

b. Provide a narrative description of how the accumulated depreciation in each such account is calculated.

c. Identify the corresponding plant account or accounts for each account in which accumulated depreciation for poles is recorded.

d. Provide a spreadsheet showing the balance of each such account at the end of each of the last three fiscal years.

8. a. Identify the depreciation rates currently used to calculate depreciation expense for each account containing utility pole costs.

b. Identify the case in which each such depreciation rate was set.

c. Identify the useful lives of the poles used to calculate each such depreciation rate.

9. Identify the total number of distribution poles in your system, and provide a breakdown of those poles based on the year they were installed.

10. Identify the total number of transmission poles in your system, and provide a breakdown of those poles based on the year they were installed.

11. Describe in detail the current plan or policy regarding the inspection and replacement of aging or damaged poles in your system, and provide a copy of any such plan or policy that has been memorialized in writing.

12. a. Explain how filing a tariff that simply incorporates another utility's tariff by reference complies with 807 KAR 5:015, Section 3; KRS 278.160; and KRS 278.180.

b. If Duo County amended its tariff, would that constitute an amendment of the tariffs of every utility that incorporated it by reference, or would each utility have to file a subsequent amendment?

13. For Ballard Rural Telephone Cooperative Corporation, Inc. only: Describe the timetable for decommissioning and removing your current poles.



Linda C. Bridwell, PE
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DATED APR 21 2022

cc: Parties of Record

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