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September 15, 2020

VIA E-MAIL TRANSMISSION

Mr. Kent Chandler
Acting Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

RE: Comments Regarding the Proposed Pole Attachment Regulation

Dear Mr. Chandler:

East Kentucky Power Cooperative, Inc. ("EKPC") thanks the Commission for allowing it to submit comments on the proposed regulation addressing pole attachments. EKPC values its participation as a stakeholder in the development of this regulation and looks forward to continued dialogue to help promote and foster an effective and efficient administrative process. To that end, EKPC tenders the following comments in its belief that utilities like itself should be excluded from application of the regulation. And EKPC recommends that the regulation language should explicitly state that such transmission-only utilities - those electric utilities that own and operate facilities predominantly at 69kV and above and with no more than 25 miles of facilities operated at below 69kV - should be excluded from the requirements of the proposed regulation.

EKPC has 2,970 miles of transmission lines located primarily in rural areas of the eastern two thirds of the Commonwealth. The lines mostly range in voltage from 69kV to 345kV and provide bulk electricity to transmission junctures and distribution points around the service territories of EKPC's 16 Owner-Member Cooperatives ("owner-members"). Because the lines do not connect directly to any farms, businesses, or residential customers, they are predominantly cross-country in alignment. EKPC also owns 0.83 miles of 34.5kV line that serves the NUCOR Steel Plant in Ghent, Kentucky, and two 12.5kV distribution feeders that deliver energy from landfill gas facilities to adjacent substations.

Two important characteristics of EKPC's cross-country transmission lines are their pole-to-pole span lengths that can be achieved due to the conductor sizes and structure heights, and the optimization of structure placement to achieve the fewest structures and most cost efficient design. This standard design practice does not provide for additional pole height and ground clearance prior to any request to attach underneath ("underbuild"), and consequently most rural

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A Touchstone Energy Cooperative The logo for Touchstone Energy Cooperative, featuring a stylized blue and green graphic.

transmission lines would require upgrading (taller and heavier structures) to accommodate underbuilt lines of any kind. Additionally, the span lengths are typically too long for common attachment cables, and require the addition of intermediate structures, which can create clearance violations because the transmission circuits must then span over them. The remedy is usually the addition of many more transmission structures or much taller structures to provide adequate clearance – either approach results in significant cost.

A typical list of EKPC span lengths organized by voltage follows:

69kV	Mean 530 ft
138kV	Mean 690 ft
162kV	Mean 704 ft
345kV	Mean 840 ft

Of EKPC's 2,970 miles of transmission lines, there are very few structures that carry electric distribution underbuild and zero miles of non-electrical underbuilds. In electrical distribution underbuild situations, an owner-member might identify a need to attach to one of EKPC's transmission lines to help gain access through a congested area or to solve some other right-of-way challenge. In these instances, EKPC would develop a cost for the modifications necessary and the owner-member would evaluate that cost against other alternatives to decide if it would be prudent and cost effective to attach. If the owner-member were to choose to underbuild, then it would pay the incremental cost. In the case of new construction, EKPC designs the transmission line both with and without the underbuild and if it decides to attach, the owner-member pays the difference. If the transmission line is already installed, EKPC would design and estimate the modification costs to be paid by the owner-member.

In a recent case for new construction, the EKPC transmission line installed cost with electric distribution line underbuild was roughly 30% more than the transmission line alone. That ratio is representative of underbuild costs for typical circumstances. While most communication attachments are not as structurally demanding as distribution conductors, they are not able to span as far, and create clearance problems that create a much costlier scenario to accommodate on electric transmission lines.

In addition to the physical and cost barriers to rural transmission underbuilt attachments, there are maintenance and safety issues related to the geometry of the structures. Remote locations make normal transmission line access and maintenance challenging, and the addition of an underbuilt attachment further complicates pole top access and right-of-way management. Since unlike distribution circuits, there is no neutral below the energized transmission conductors, maintenance on the attachment would need to be done by a work force familiar with high voltage transmission line clearances and characteristics.

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Additionally, the vast majority of transmission line facilities within the EKPC system are located within the boundaries of recorded written easement agreements with the underlying property owner or his/her predecessor in title wherein EKPC was granted the right to construct, operate, and maintain transmission electric facilities. And the vast majority of those various templates of easement agreements that are of record do not further permit any other attachments from communications companies and the like on EKPC transmission structures. Therefore, any effort to do so by communication companies would require them to acquire all necessary property rights from the underlying owners, aside from the operational limitations and added costs that EKPC would encounter.

EKPC believes the above comments clearly show that it is impractical for transmission-only utilities to be subject to the proposed regulation, and asks the Commission to amend the proposed regulation to explicitly state this exclusion.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger R. Cowden". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Roger R. Cowden
Deputy General Counsel