

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

**THE ELECTRONIC APPLICATION OF)
KENERGY CORP. FOR A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY)
FOR THE CONSTRUCTION OF A HIGH-SPEED) Case No. 2021-00365
FIBER NETWORK AND FOR APPROVAL OF THE)
LEASING OF THE NETWORK'S EXCESS CAPACITY)
TO AN AFFILIATE TO BE ENGAGED IN THE)
PROVISION OF BROADBAND SERVICE TO)
UNSERVED AND UNDERSERVED HOUSEHOLDS)
AND BUSINESSES OF THE COMMONWEALTH)**

**KENERGY CORP'S RESPONSES TO
COMMISSION STAFF'S FIRST REQUEST
FOR INFORMATION**

KENERGY CORP. responds to **COMMISSION STAFF'S** first request for information as follows:

1. Refer to the Application, page 3, paragraph 8.
 - a. Provide the annual maintenance cost of Kenergy's existing microwave-based communications system.

RESPONSE: **The maintenance cost of Kenergy's existing microwave-based communications system was \$104,009.32 for calendar year 2020.**

WITNESS: TRAVIS SIEWERT

b. Generally explain the reliability of Kenergy's existing microwave-based communications system, and provide insight into the outage rate of the system in a typical year.

RESPONSE: Kenergy's microwave system was engineered for 99.9999 % up time per year. This equates to approximately six minutes of down time per year. There are occasional incidental interruptions due to lightning damage or radio component failure. These incidences are not system wide but affect only "spurs" or individual sites. Typically, system wide for Kenergy's microwave radios, outage rate ranges from five to seven days. At no one time is the entire system affected. This outage rate is the sum of isolated, single-site incidences.

WITNESS: ROBERT STUMPH

c. In the event of an outage situation to the proposed fiber network, explain whether the current microwave-based communications system will remain in place and operational as a backup form of communication between Kenergy's substations and control stations.

RESPONSE: The potential future use and value of the existing communications system is still being evaluated. It may still have value for reaching remote mobile radio repeater sites.

WITNESS: ROBERT STUMPH

2. Refer to the Application, page 5, paragraph 11. Provide the remaining useful life of Kenergy's existing automated meters.

RESPONSE: **The existing automated meters will be fully depreciated in approximately 8 years.**

WITNESS: **TRAVIS SIEWERT**

3. Refer to the Application, page 5, paragraph 13 and to page 6, paragraph 15.

a. Provide the expected capacity capability of the proposed fiber network.

Explain whether this will vary by location and corresponding line thickness.

RESPONSE: **The fiber count will vary by location. Each area will be evaluated based on density and expected growth to determine the correct size of the cable being used. In addition, fiber optic cabling has almost limitless capacity by changing out the electronics as new technologies become available.**

WITNESS: **JONATHAN CHAMBERS**

b. Explain what portion of the fiber network will be used for intra-system

communications. (Where two witnesses provide answers to responses, the witness testimony is linked to that

witness by underlining the testimony provided and underlining that witness' name.)

RESPONSE: The portion of the fiber cable that will be used for intra-system communications will be determined during the design phase. Typically these fibers will be designated as "reserved" and will be available for intra-system communication. Less than 5% of the system's capability will be needed for intra-system communications

WITNESS: JONATHAN CHAMBERS & ROBERT STUMPH

c. Explain what proportion of the proposed fiber network's capacity is expected to be in excess of Kenergy's capacity need.

RESPONSE: This will be based on design. If 12 fibers are reserved for intra-system communication in a 144 count fiber bundle then the proportion will be different than if a 96 or 48 count fiber bundle will be used in another area. The design does not use a single size fiber cable bundle throughout the entire system, just like the power grid, we start out with larger cable or "conductor" and as we near the end of the line the size is reduced. 90 to 95% of the system's capacity will be excess.

WITNESS: JONATHAN CHAMBERS & ROBERT STUMPH

d. Describe the intra-system communications needs Kenergy plans to meet

by utilizing its poles for a fiber network and explain how those intra-system communication needs are currently being met.

RESPONSE: Kenergy plans to leverage the new fiber system for all intra-system voice and corporate data communications as well as SCADA/telemetry and video to all substations. In addition, Mobile radio traffic and AMI data will be transported on the fiber. At present, Kenergy has a combination of both microwave radios and fiber that are meeting these needs.

WITNESS: ROBERT STUMPH

4. Refer to the Application, page 6, paragraph 15. Explain whether Kenergy has any plans to address the fiber becoming obsolete before the end of the 20-year cost recovery period or the 30-year lifespan of the fiber network.

RESPONSE: According to Corning "there is no 'theoretical lifetime' for optical fiber. The fiber optic cables manufactured and installed 40 years ago are still in use today, and we know our newest cables are even stronger. Our outside Plant cables (OSP), for example are designed to withstand environmental extremes. They offer clear signal performance over a wide range of temperatures while resisting water ingress and years of the sun's ultraviolet radiation. And, by carrying light instead of electricity, OSP cables are safe from lightning strikes or electrical faults. Fiber is the clearest choice today, and its rugged durability is showing us that we have every reason to believe we'll be relying upon it for many years to come."

WITNESS: JONATHAN CHAMBERS

5. Refer to the Application, page 6, paragraph 15. Also, refer to the Application, Exhibit A, Direct Testimony of Jeff Hohn (Hohn Direct Testimony), Exhibit 1, Fiber Optic Lease, page 1, paragraph 3. Explain whether Kenergy will receive payments from Kenect on an annual or a monthly basis.

RESPONSE: It is an annual lease obligation paid in monthly installments.

WITNESS: JEFF HOHN

6. Refer to the Application, pages 10–11, paragraph 30.

a. Provide a detailed explanation how instantaneous communication between substations and control offices will benefit Kenergy.

Having instantaneous communication between the substation and control office has many benefits that can reduce power outage duration by allowing dispatch to pinpoint fault locations and send crews directly to the affected area. Another benefit is the ability to reduce peak load by safely utilizing voltage reduction and monitoring the end of the line voltage to ensure it is within safe limits. A third benefit is in allowing dispatch to remotely open switches in emergencies, or as part of an emergency power reduction plan such as rolling blackouts. Real time data acquisition is imperative for an optimally performing SCADA and OMS

system. Control Center dispatchers require fast and accurate data to control and monitor the distribution system.

WITNESS: JONATHAN CHAMBERS & ROBERT STUMPH

b. Explain whether any of the speed, reliability, or security benefits of a fiber network can be quantified into cost savings to Kenergy at this time, and if so, provide the estimated cost savings.

RESPONSE: The successful buildout of a fiber system will eliminate the need for ongoing, annual microwave system related expenses. For example, annual tower inspections, painting, incidental maintenance, and radio and beacon repairs. Refer to the response to 1a for costs from the year 2020. Also, many of Kenergy's radios are legacy Alcatel radios which are no longer manufacturer supported and will have to be replaced at additional costs.

WITNESS: ROBERT STUMPH

7. Refer to the Application, page 16, paragraph 49. Describe in specific detail how Kenergy identified unserved and underserved areas, as defined by KRS 278.5464, in which broadband service will be provided by Kenergy's affiliate, Kenect, Inc. (Kenect).

RESPONSE: Unserved and underserved areas are identified by overlaying the

Cooperative's GIS data with publicly available data about service providers in their territory.

WITNESS: JOHNATHAN CHAMBERS

8. Refer to Hohn Direct Testimony, page 4, lines 7–8. Explain whether Kenergy is aware of any existing automated meters on the market that are fiber dependent or whether Kenergy is speculating that future automated meters will be fiber dependent.

RESPONSE: Kenergy is not aware of any existing automated meters that are fiber dependent.

WITNESS: ROBERT STUMPH

9. Refer to Hohn Direct Testimony, page 4, lines 8–12.

a. Confirm that Kenergy will not upgrade its existing microwave-based communications system or automated meter system until completion of the Fiber Network.

RESPONSE: Kenergy plans to continue only the minimum annual maintenance and required software support agreements. No major infrastructure upgrades will take place for either the microwave or AMI systems.

WITNESS: ROBERT STUMPH

b. Provide an estimated date or time period when Kenergy will upgrade its communications system or automated meter system to be online with the fiber network.

RESPONSE: Much of the communications upgrades could take place in phases in conjunction with the buildout of the fiber systems. The completion of the intra communication system upgrades should follow closely after the completion of the fiber buildout. The AMI system will be upgraded when the existing AMI meters reach the end of their useful life.

WITNESS: ROBERT STUMPH

c. Provide a cost estimate for upgrading Kenergy's communications system or automated meter system to be online with the fiber network.

RESPONSE: Potential costs for upgrading the AMI system to fiber can vary greatly depending on if existing meters can be retro-fitted or if entirely new meters are required. Also, communications to each substation will offer different costs and challenges unique to each substation.

WITNESS: ROBERT STUMPH

d. Explain how Kenergy plans to handle cybersecurity measures during the transition from the current intra-system to the fiber network and how Kenergy will

handle cybersecurity with the fiber network going forward.

RESPONSE: As with Kenergy's existing voice/data and SCADA networks, the utmost in due diligence, using firewalls at all critical network junctures, will be given to keeping all of Kenergy's networks protected against cyber security threats. At no point in the transition from old to new networks will this protection be compromised in any way.

WITNESS: ROBERT STUMPH

10. Refer to Hohn Direct Testimony, page 4, lines 23–24.

a. Explain whether Kenect will contract out the operation of the broadband retail components to any other entity that is not Conexon or Conexon Connect.

RESPONSE: I believe this question refers to Hohn Direct Testimony, page 2, lines 23-24, not Hohn Direct Testimony, page 4, lines 23-24 because those lines on that page are a question and a blank line. So, based on Hohn Direct Testimony, page 2, lines 23-24, the answer is "no."

WITNESS: JEFF HOHN

b. Explain whether the end-use customers in Kenergy's service territory will have access to other broadband services not provided by Conexon or Conexon Connect.

RESPONSE: Not through Kenergy's fiber system. All excess fiber not used for Kenergy's purpose will be leased to Kenect, who, in turn, will lease 100% of the excess fiber to Conexon/Conexon Connect.

WITNESS: JEFF HOHN

11. Refer to Hohn Direct Testimony, page 4, lines 29–37.

a. Provide specific details regarding the necessary “make ready work” that needs to be performed for the installation of the fiber network.

RESPONSE: The amount of “make ready work” is estimated based upon work with other cooperatives. The exact scope is unknown until the system is reviewed and pole loading analysis is performed but the estimate used is believed to be an accurate estimate. Generally, “make ready work” involves taking measurements of the poles to ensure that there will be adequate clearance once fiber is added in the electric space and performing a pole load analysis to ensure that the pole can handle the added weight of the fiber in ice loading conditions. If the pole is inadequate then it must be changed out to handle the additional load.

WITNESS: ROBERT STUMPH

b. Confirm that the costs of the make ready work is included in the Amended Construction Work Plan (ACWP) cost estimate.

RESPONSE: Confirmed.

WITNESS: TRAVIS SIEWERT

12. Refer to the Application, Exhibit B, Direct Testimony of Travis Siewert (Siewert Direct Testimony), page 1 and 2, response to Q5.

a. Explain whether Kenergy paid Conexon for its role in providing the estimated cost of installing the fiber network on Kenergy's existing poles.

RESPONSE: Kenergy paid Conexon \$15,000 to prepare the feasibility study in late 2019. Big Rivers reimbursed Kenergy for this entire amount. Kenergy also paid Conexon \$1,053.19 for travel expenses when Conexon presented the results of the feasibility study to Kenergy's board of directors in early 2020. There have been no other payments to Conexon.

WITNESS: TRAVIS SIEWERT

b. Explain whether Kenergy provided any payment to Conexon, or Conexon Connect, for its role in the preparation of any additional material for the proposed fiber network.

RESPONSE: No. The \$16,053.19 mentioned in the response to item 12a above is the total amount Kenergy has paid Conexon and Conexon Connect to date.

WITNESS: TRAVIS SIEWERT

c. Explain whether Conexon or Conexon Connect will own the electronics in the end-users home.

RESPONSE: Conexon Connect will own the electronics in the end users home and will be responsible for the repair and maintenance of those electronics.

WITNESS: JONATHAN CHAMBERS

13. Refer to Siewert Direct Testimony, page 2, response to Q6.

a. Explain whether the maintenance detailed in the lease agreement will be performed by Conexon or Conexon Connect.

RESPONSE: Conexon Connect will be responsible for the maintenance of the system.

WITNESS: JONATHAN CHAMBERS

b. Explain in detail what Kenergy's level of maintenance would entail to "[make] the fiber cable safe during an outage situation".

RESPONSE: Kenergy will treat the fiber the same as if it was an attacher on the pole.

WITNESS: JONATHAN CHAMBERS

14. Refer to Siewert Direct Testimony, page 2, response to Q6. Provide a detailed list of other fiber network projects Conexon has completed with electric cooperatives.

- **RESPONSE: Arkansas Valley Electric Cooperative**
- **Canadian Valley Electric Cooperative**
- **Central Georgia Electric Cooperative**
- **Central Rural Electric Cooperative**
- **Central Virginia Electric Cooperative**
- **Coast Electric Power Association**
- **Cookson Hills Electric Cooperative**
- **Coos Curry Electric Cooperative**
- **Cumberland Electric Membership Corp.**
- **Delta Electric Power Association**
- **East Central Oklahoma Electric Cooperative**
- **East Mississippi Electric Cooperative**
- **Farmers Electric Cooperative**
- **Forked Deer Electric Cooperative**
- **Irwin Electric Cooperative**
- **Kosciusko Electric Cooperative**
- **Middle Georgia Electric Cooperative**
- **MidSouth Synergy**
- **Mississippi County Electric Cooperative**
- **Monroe County Electric Power Association**
- **Mountain Parks Electric Cooperative**
- **Mountain View Electric Cooperative**
- **Natchez Trace Electric Cooperative**
- **New Hampshire Electric Cooperative**
- **Northeast Mississippi Electric Cooperative**
- **Oklahoma Electric Cooperative**
- **Osage Valley Electric Cooperative**
- **Otsego Electric Cooperative**
- **Pearl River Electric Cooperative**
- **Petit Jean Electric Cooperative**
- **Presque Isle Electric Cooperative**
- **Sac Osage Electric Cooperative**

- **Satilla Electric Cooperative**
- **SEMO Electric Cooperative**
- **Singing River Electric Cooperative**
- **South Central Arkansas Electric Cooperative**
- **Southwest Arkansas Electric Cooperative**
- **Southern Rivers Electric Cooperative**
- **Steuben Electric Cooperative**
- **Tombigbee Electric Cooperative**
- **Tri-County Electric Cooperative (GA)**
- **Tri-County Electric Cooperative (SC)**
- **Washington Electric Cooperative**

WITNESS: JONATHAN CHAMBERS

15. Refer to Siewert Direct Testimony, page 3, response to Q7. Provide the analysis of market rates performed by Conexon.

RESPONSE: Conexon performed an in depth market analysis that is used to determine take rates. See attached market analysis performed for Kenergy and filed under Petition for Confidentiality. The assurance that the electric business of Kenergy is not subsidizing broadband is that you can look at 20 years of cash flow to determine that the lease payment covers the cooperative for all of the expenses related to the fiber construction. Kenergy will have 20 years positive cashflow and 20 years positive internal rate of return on that cashflow. The revenue coming in from the subscribers to the broadband network is used to pay the cooperative the

lease payments.

WITNESS: JONATHAN CHAMBERS

16. Refer to Siewert Direct Testimony, page 3, response to Q8.

a. Explain what roles the additional staff for Kenergy would perform that could not be performed by staff employed by Kenect.

RESPONSE: Under the current lease/sublease arrangement, neither Kenergy nor Kenect plan to hire any employees. Kenect will sublease the excess fiber to Conexon Connect, who will have all the employees required to provide retail broadband service.

WITNESS: TRAVIS SIEWERT

b. Explain whether Kenergy would maintain separate books and records of Kenergy employees used for Kenect purposes as required by KRS 278.2203 and KRS 278.2207.

RESPONSE: See the response to item 16a above. Neither Kenergy nor Kenect plan to hire any employees for broadband. Kenergy will have separate payroll task codes and account numbers for any labor or expense that may arise, but at this time Kenergy does not anticipate any significant amount.

WITNESS: TRAVIS SIEWERT

17. Refer to the Application, Exhibit C, Direct Testimony of Robert Stumph (Stumph Direct Testimony), page 2, lines 15–16, and footnote 1.

a. Explain whether the possible addition of new poles has been included in the Amended Construction Work Plan (ACWP) cost estimate.

RESPONSE: Yes, Conexon has estimated the cost of make read work across Kenergy's system and that amount is included in the Amended Construction Work Plan (ACWP) cost estimate. This would include changing out Kenergy poles, modifying existing poles, and adding new poles to accommodate the fiber infrastructure.

WITNESS: TRAVIS SIEWERT

b. Provide the projected costs associated with the addition of the new poles. Based on Conexon's experience constructing fiber networks for other co-ops, Conexon estimates \$800 per primary mile of fiber for make ready engineering and \$4,000 per primary mile of aerial fiber for make ready construction. This translates to \$24,777,914 in make ready cost for Kenergy's system, which is included in the total project cost of \$143,825,355.

WITNESS: TRAVIS SIEWERT

18. Refer to Stumph Direct Testimony, page 2, lines 19–20. Explain in detail what head end equipment entails and the purpose it will serve.

RESPONSE: Head end equipment is similar to a Central Office at a telephone company. With fiber, head end is a centralized control unit where external sources for programming and data are gathered, processed, and packaged for distribution.

WITNESS: ROBERT STUMPH

19. Refer to Stumph Direct Testimony, page 2, lines 9–20. Explain whether installing the fiber network infrastructure on Kenergy's existing poles and substations will cause any disruption to the electric distribution service provided by Kenergy to its members.

RESPONSE: In cases where poles need to be replaced or modified, there could be site specific outages. For example, a pole being changed that contains a transformer will cause an outage during replacement.

WITNESS: ROBERT STUMPH

20. Provide a detailed list of any changes that might have occurred between the fiber network plan as discussed in Case No. 2020-00215 and the fiber network plan as presented in this case.

RESPONSE: 1. In the original fiber network plan, Kenergy, through its subsidiary Kenect, was going to build the fiber network and be the ultimate broadband provider. Therefore, the total capital expenditures were approximately

\$17 million higher because Kenect was going to own the electronics in the broadband subscriber's home and at the headend. Under the current lease/sublease arrangement Kenergy/Kenect will not own the electronics in the boardband subscribers home or the headend.

2. The original financials included hiring new Kenergy/Kenect employees and purchasing vehicles. Under the current lease/sublease arrangement Kenergy and Kenect have no new employees or vehicles. All employees related to broadband will be employed by Conexon Connect. There are no employees or vehicles included in the financials provided under petition for confidential treatment in this case.

3. The original financials included an interest rate of 3.5% on borrowed funds. The financials provided under petition for confidentiality in this case include an interest rate of 4%. RUS requires Kenergy use 4% for any new borrowing in its long-range financial forecast that is filed with the RUS loan application.

4. The original financials had a 6-year buildout. The financials provided under petition for confidentiality in this case have a 4-year buildout in order to match the 4-year drawdown period of an RUS loan.

WITNESS: TRAVIS SIEWERT

21. Refer to Case No. 2020-00215 and Kenergy's October 23, 2020 filing in this case. Provide a detailed list of any changes that occurred since the Chambers feasibility study was filed in Case No. 2020-00215 and in this case.

RESPONSE: Since the original feasibility study was prepared, Conexon was awarded funds in the RDOF auction for Kenergy's service territory. In addition to the base lease fee, Kenergy will also receive a portion of the RDOF funds per section 4.3 (Revenue Share) of the Fiber Optic Sublease Agreement, filed under petition for confidentiality.

WITNESS: TRAVIS SIEWERT

22. Describe all reasonable alternatives to the proposed fiber network project that were conducted by Kenergy.

RESPONSE: Based on the reliability and capacity factors alone, there are not any reasonable alternatives that Kenergy felt would accomplish what Kenergy was striving to achieve.

WITNESS: JEFF HOHN

23. Identify all entities currently having attachments on Kenergy's poles.

RESPONSE: At present, the list below are the attachers. Watch Communications and OpenFiber Kentucky are both anticipating making attachments.

Time Warner

AT&T

Inside Connect

Zito

Mediacom SE

Windstream KY E

TDS Lewisport

TDS Salem

City of Henderson

Comcast of the South

MuniNet Fiber

OMU

Windstream Communications

Crown Castle

Hancock Co Board of Education

Commonwealth of KY

WITNESS: ROBERT STUMPH

24. Describe any additional work or improvements that must be made to Kenergy's poles to accommodate the fiber network, the additional costs, and the approximate number of poles that will be replaced to accommodate the installation of the

fiber network.

RESPONSE: Please see the responses to Items 11a and b and 17a and b above.

WITNESS: TRAVIS SIEWERT

25. Describe the relationship between Conexon and Conexon Connect, and the roles each entity has in the fiber network proposal with Kenergy and Kenect.

RESPONSE: Conexon is the parent of Conexon Connect. Conexon Connect is the sublessee of Kenect.

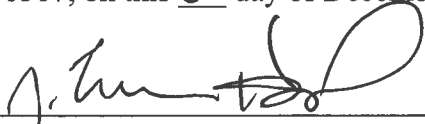
WITNESS: JEFF HOHN

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318 Second Street
Henderson, KY 42420
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Telefax (270) 826-6672
Attorneys for Kenergy Corp. and Kenect

By  _____
J. Christopher Hopgood
chopgood@dkgnlaw.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served by electronic filing to the Kentucky Public Service Commission, 211 Sower Blvd., Frankfort, KY 40602 with a copy served electronically to the Kentucky Attorney General, Office of Rate Intervention, 700 Capital Avenue, Suite 20, Frankfort, KY 40601-8204, with a courtesy copy of the public response to James W. Gardner and M. Todd Osterloh, Sturgill, Turner, Barker & Maloney, PLLC, 333 W. Vine St., Suite 1500, Lexington, KY 40507, on this 3rd day of December, 2021.

 _____
Counsel for Kenergy Corp.

COMMONWEALTH OF KENTUCKY
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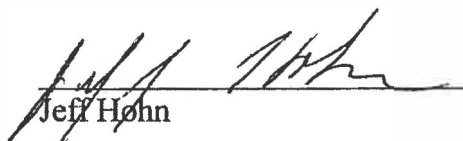
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(Staff Data Requests B Items 5; 10; 22 & 25)

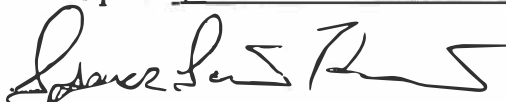
I verify, state and affirm that the data request response attached hereto and filed with this verification is true and correct to the best of my knowledge and belief formed after a reasonable inquiry, and I ask that I be added as a witness for this information.


Jeff Hohn

STATE OF KENTUCKY
COUNTY OF Daviess

The foregoing was signed, acknowledged and sworn to before me by JEFF HOHN this 2 day of December, 2021.

My commission expires 18 Mar 2024 # KYNA 1149



Notary Public, State of Kentucky at Large

(seal)

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(Staff Data Requests B Items 1(a); 2; 11(b); 12(a); 12(b); 16; 17; 20, 21; & 24

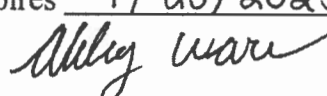
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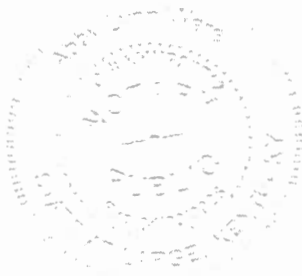
Travis Siewert

STATE OF KENTUCKY
COUNTY OF Henderson

The foregoing was signed, acknowledged and sworn to before me by TRAVIS SIEWERT this 2 day of December, 2021.

My commission expires 4/20/2025


(seal)



Notary Public, State of Kentucky at Large

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(Staff Data Requests B Items 1(b); 1(c); 3(b); 3(c); 3(d); 6(a); 6(b); 8; 9, 11(a); 18 & 23)

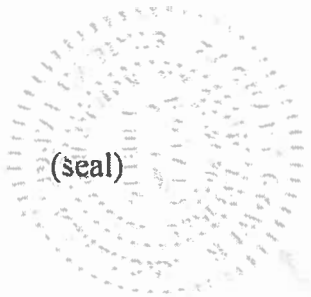
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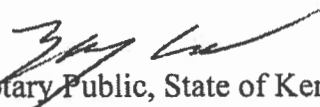

Robert Stumph

STATE OF KENTUCKY
COUNTY OF Henderson

The foregoing was signed, acknowledged and sworn to before me by ROBERT STUMPH this 2 day of December, 2021.

My commission expires 9-24-22 609381




Notary Public, State of Kentucky at Large

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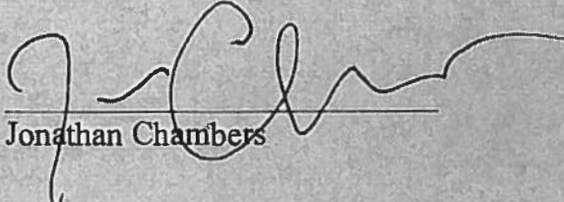
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(Staff Data Requests B Items 3(a); 3(b); 3(c); 4; 6(a); 7; 12(c); 13; 14 & 15

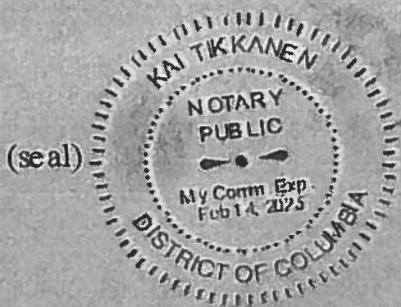
I verify, state and affirm that the data request response attached hereto and filed with this verification is true and correct to the best of my knowledge and belief formed after a reasonable inquiry, and I ask that I be added as a witness for this information.

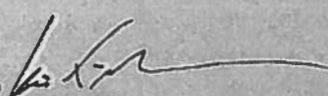

Jonathan Chambers

~~KT~~ STATE OF District of Columbia
~~KT~~ COUNTY OF _____

The foregoing was signed, acknowledged and sworn to before me by JONATHAN CHAMBES this 3rd day of December, 2021.

My commission expires 02/14/2025



Notary Public, 
Notary Public ID#: N/A

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

THE ELECTRONIC APPLICATION OF)
KENERGY CORP. FOR A CERTIFICATE)
OF PUBLIC CONVENIENCE AND NECESSITY)
FOR THE CONSTRUCTION OF A HIGH-SPEED)
FIBER NETWORK AND FOR APPROVAL OF THE)
LEASING OF THE NETWORK'S EXCESS CAPACITY)
TO AN AFFILIATE TO BE ENGAGED IN THE)
PROVISION OF BROADBAND SERVICE TO)
UNSERVED AND UNDERSERVED HOUSEHOLDS)
AND BUSINESSES OF THE COMMONWEALTH)

Case No.
2021-00365

KENERGY RESPONSES TO STAFF'S DATA REQUESTS
ATTACHMENT TO REQUEST 15

FILED UNDER PETITION FOR CONFIDENTIALITY