

Kentucky Power Company
KPSC Case No. 2022-00105
KBCA's Second Set of Data Requests
Dated May 19, 2022

DATA REQUEST

KBCA 2_01 Explain how a new attacher would determine whether a pole was “[d]esignated for replacement within two (2) years of the date of its actual replacement for any reason unrelated to a new attacher’s request for attachment,” as stated in 807 KAR 5:015 Section 1(10)(b), if the pole was not visibly marked with a colored tag or other indication of replacement.

RESPONSE

Kentucky Power addressed this question in its responses to Kentucky Broadband and Cable Association’s (“KBCA”) First Set of Information Requests. For example, Kentucky Power explained that—under the Commission’s new pole attachment regulations—new attachers are entitled to be present for any field inspections and can learn in real-time whether any of poles along a proposed route meet the definition of a “red-tagged” pole:

[T]he Commission’s pole attachment regulation provides a new attacher with the right to be present during any field inspection performed by Kentucky Power. *See* 807 KAR 5:015, Section 4(2)(b)2. If Kentucky Power identifies a pole in need of replacement due to defect during a make-ready survey, and the attacher is present, the attacher would learn in real time that a pole is being red-tagged.

KPCO_R_KBCA_1_05.b. Kentucky Power further explained that it cross-references poles identified in an attachment request against its database to ensure that none of the poles along the proposed route have been “red-tagged”:

Moreover, to ensure that the cost of replacing a “red-tagged” pole is not accidentally attributed to an attaching entity (e.g., in those rare instances where Kentucky Power previously identified—but failed to tag—a “red-tagged” pole during an inspection), Kentucky Power will also query the cloud-based database referenced above during the application review process to ensure that none of the poles along an attaching entity’s proposed route are “red-tagged.” In either of these scenarios, the cost of repairing or replacing the defective pole is not included within the make-ready estimate Kentucky Power prepares in response to the attaching entity’s application.

KPCO_R_KBCA_1_05.a.

Witness: Pamela F. Ellis

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KBCA 2_02 State whether You will visibly mark “Red-tagged poles,” as that term is defined in 807 KAR 5:015, with colored tags or in some other manner. If You will mark the poles with colored tags, state which colors You will use, and what those colors signify.

RESPONSE

Yes. As previously explained, Kentucky Power utilizes a red tag with a white arrow to identify “red-tagged” poles:

Where Kentucky Power determines that a pole is deficient and in need of replacement, Kentucky Power typically places a red tag on the pole with a white arrow pointing towards the source of the deficiency. For example, if a “red-tagged” pole is marked with an arrow point towards the base of the pole, that means that the base of the pole is deficient. If a “red-tagged” pole is marked with an arrow pointing up, that means that the pole-top is deficient.

KPCO_R_KBCA_1_05.b.

Witness: Pamela F. Ellis

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KBCA 2_03 Identify the average amount of time You spend per pole on a pre-construction survey.

RESPONSE

Kentucky Power spends a de minimis amount of time of the pre-construction survey, as that part of the process is handled by a third-party contractor.

Witness: Pamela F. Ellis

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DATA REQUEST

KBCA 2_04 State the “annual maintenance costs of Kentucky Power’s Joint Use Portal,” as referenced in Your Response to KBCA RFI 1-2, for the past five years.

RESPONSE

Kentucky Power does not have data dating back five (5) years. The total annual maintenance cost for the Joint Use Portal is approximately \$3,800 which Kentucky Power has historically shared with its AEP affiliate companies. As explained in Kentucky Power’s responses to KBCA’s First Set of Requests for Information, the Joint Use Portal was first placed into operation in 2018. *See* KPCO_R_KBCA_1_05.b. Therefore, the annual maintenance cost set forth herein is based on data from 2018-2021. Because the Joint Use Portal is used enterprise-wide (i.e., it is used by all of Kentucky Power’s affiliates), Kentucky Power only bears a portion of the annual maintenance cost.

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KBCA 2_05 State whether the “annual maintenance costs of Kentucky Power’s Joint Use Portal,” are apportioned among all attachers, and if so, provide the calculation.

RESPONSE

As previously explained, Kentucky Power recovers its share of the annual maintenance cost for the Joint Use Portal through a 15% surcharge included in its make-ready survey fee. *See* Response of Kentucky Power Company to the Objections of AT&T and KBCA to Revised Tariff P.A. at 8 (“In addition to capturing the pass-through costs charged by Kentucky Power’s contractor, the Survey Estimate also includes a small surcharge (equal to 15% of the average per pole make-ready survey estimate) designed to cover the maintenance costs of Kentucky Power’s Joint Use Portal.”); *see also* KPCO_R_KBCA_1_05.b. (“The 15% surcharge is designed to capture two recurring costs: (1) annual maintenance costs of Kentucky Power’s Joint Use Portal and (2) Kentucky Power's administrative costs associated with processing pole attachment applications. The administrative costs fluctuate widely based on the number and complexity of applications Kentucky Power receives each year. Amounts recovered through the 15% surcharge are credited to the following FERC accounts: 5880000 and 1070001. This ensures that the Kentucky Power’s ratepayers do not bear the costs associated with the Joint Use Portal or the processing of pole attachment applications.”). Because the annual maintenance cost for the Joint Use Portal is recovered through Kentucky Power’s make-ready survey fee, the annual maintenance cost is not apportioned among all attachers and is, instead, borne by new attachers.

Witness: Pamela F. Ellis

VERIFICATION

The undersigned, Pamela F. Ellis, being duly sworn, deposes and says she is the Director, Energy Delivery Engineering Services for American Electric Power Service Corporation, that she has personal knowledge of the matters set forth in the foregoing responses and the information contained therein is true and correct to the best of her information, knowledge, and belief.

Pamela F. Ellis

Pamela F. Ellis

Commonwealth of Kentucky)

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Case No. 2022-00105

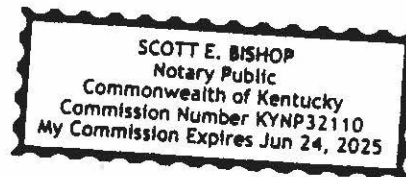
County of Boyd)

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Subscribed and sworn before me, a Notary Public, by Pamela F. Ellis this 1st day of June, 2022.

Scott E. Bishop

Notary Public



My Commission Expires June 24, 2025

Notary ID Number: KYNP 32110