

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

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	
PROPOSED POLE ATTACHMENT TARIFFS OF)	CASE NO.
RURAL ELECTRIC COOPERATIVE)	2022-00106
CORPORATIONS)	

**RESPONSES TO COMMISSION STAFF'S FIRST INFORMATION REQUEST
TO EAST KENTUCKY POWER COOPERATIVE, INC.**

DATED APRIL 22, 2022

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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PROPOSED POLE ATTACHMENT TARIFFS OF)	CASE NO.
RURAL ELECTRIC COOPERATIVE)	2022-00106
CORPORATIONS)	

CERTIFICATE

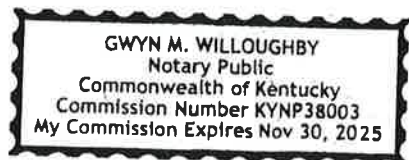
STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Michelle K. Carpenter, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Data Requests in the above-referenced case dated April 22, 2022, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.

Michelle K. Carpenter

Subscribed and sworn before me on this 4th day of May 2022.

Gwyn M. Willoughby
Notary Public



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

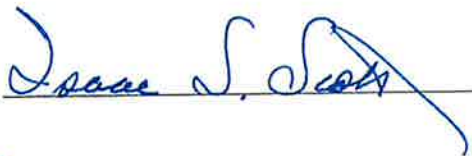
In the Matter of:

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PROPOSED POLE ATTACHMENT TARIFFS OF)	CASE NO.
RURAL ELECTRIC COOPERATIVE)	2022-00106
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STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Isaac S. Scott, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Data Requests in the above-referenced case dated April 22, 2022, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



Subscribed and sworn before me on this 3rd day of May 2022.




Notary Public

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC INVESTIGATION OF THE)	
PROPOSED POLE ATTACHMENT TARIFFS OF)	CASE NO.
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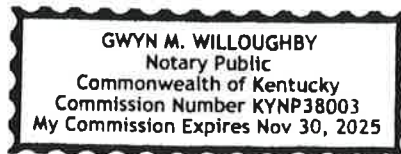
Mary Jane Warner, being duly sworn, states that she has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Data Requests in the above-referenced case dated April 22, 2022, and that the matters and things set forth therein are true and accurate to the best of her knowledge, information and belief, formed after reasonable inquiry.



Subscribed and sworn before me on this 4th day of May 2022.



Notary Public



COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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PROPOSED POLE ATTACHMENT TARIFFS OF)	CASE NO.
RURAL ELECTRIC COOPERATIVE)	2022-00106
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STATE OF KENTUCKY)
)
COUNTY OF CLARK)

Denver York, being duly sworn, states that he has supervised the preparation of the responses of East Kentucky Power Cooperative, Inc. to the Public Service Commission Staff Data Requests in the above-referenced case dated April 22, 2022, and that the matters and things set forth therein are true and accurate to the best of his knowledge, information and belief, formed after reasonable inquiry.



Subscribed and sworn before me on this 3RD day of May 2022.



Terri K. Combs KYNP17358
Notary Public

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2022-00106
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 04/22/22
REQUEST 1

RESPONSIBLE PARTY: Isaac S. Scott

Request 1. Refer to the Joint Response of Rural Electric Cooperative Corporations to Objections filed by KBCA and AT&T, page 7, regarding the reservation of space.

Request 1a. Explain what limits, if any, the language in your proposed tariff places on the utility's ability to reserve space with references to relevant tariff language and statutes and regulations, if applicable.

Request 1b. Explain specifically whether the ability to reserve space is intended to be limited to space for equipment necessary to provide electric service.

Response 1a-b. EKPC has reviewed the objections filed by KBCA and AT&T and the Joint Response of the Rural Electric Cooperative Corporations. Neither of the filings apply to EKPC's proposed tariff and therefore no response is necessary.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. 2022-00106
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 04/22/22
REQUEST 2

RESPONSIBLE PARTY: Isaac S. Scott

Request 2. Refer to the Joint Response of Rural Electric Cooperative Corporations to Objections filed by KBCA and AT&T, page 8, regarding penalties for violations other than unauthorized attachments.

Request 2a. Identify how often such penalties are expected to be imposed per year and the amount of revenue expected be generated from them.

Request 2b. Explain whether the penalty would be imposed on a per pole basis and, if so, explain whether there would be any limit to the penalties that could arise from a single practice, such as improper means of attachment repeated on multiple poles.

Request 2c. Explain why the imposition of the penalty is permissive (i.e., "Cooperative may impose") and how that would be imposed on a non-discriminatory basis.

Request 2d. Describe the types of issues this penalty is intended to prevent.

Response 2a-d. EKPC has reviewed the objections filed by KBCA and AT&T and the Joint Response of the Rural Electric Cooperative Corporations. Neither of the filings apply to EKPC's proposed tariff and therefore no response is necessary.

**EAST KENTUCKY POWER COOPERATIVE, INC.
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REQUEST 3

RESPONSIBLE PARTY: Isaac S. Scott

Request 3. Refer to the Joint Response of Rural Electric Cooperative Corporations to Objections filed by KBCA and AT&T, pages 12-13 regarding the definition of attachment. Explain how attachers would be charged for over lashing based on the definition of attachment in proposed tariff.

Response 3. EKPC has reviewed the objections filed by KBCA and AT&T and the Joint Response of the Rural Electric Cooperative Corporations. Neither of the filings apply to EKPC's proposed tariff and therefore no response is necessary.

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REQUEST 4

RESPONSIBLE PARTY: Isaac S. Scott

Request 4. Refer to the Joint Response of Rural Electric Cooperative Corporations to Objections filed by KBCA and AT&T, pages 15-16, regarding the definition of "Supply Space." Explain whether the requirement that the initial attachment be one foot above the required ground clearance was included, in part or in whole, to account for a drop in the height of the line across the span length. If so, explain why the one-foot drop was used (as opposed to some other amount).

Response 4. EKPC has reviewed the objections filed by KBCA and AT&T and the Joint Response of the Rural Electric Cooperative Corporations. Neither of the filings apply to EKPC's proposed tariff and therefore no response is necessary.

EAST KENTUCKY POWER COOPERATIVE, INC.

PSC CASE NO. 2022-00106

FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 04/22/22

REQUEST 5

RESPONSIBLE PARTY: Isaac S. Scott

Request 5. Refer to the Joint Response of Rural Electric Cooperative Corporations to Objections filed by KBCA and AT&T, pages 20-21, regarding the cost of safety inspections.

Request 5a. Explain what circumstances would generally justify a finding of “reasonable cause to believe code violations or unsafe conditions (or other violations of ARTICLE III) exist on its system.”

Request 5b. Explain how such safety inspections would differ from pole inspection required by 807 KAR 5:006, and explain whether they would be conducted in conjunction with such inspections or any other required system inspection.

Request 5c Explain how the cost of such safety inspections would be separated from other operation and maintenance costs and how such costs, if any, would be allocated to specific attachers.

Response 5a-c. EKPC has reviewed the objections filed by KBCA and AT&T and the Joint Response of the Rural Electric Cooperative Corporations. Neither of the filings apply to EKPC's proposed tariff and therefore no response is necessary.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. PSC CASE NO. 2022-00106
FIRST REQUEST FOR INFORMATION RESPONSE

COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 04/22/22

REQUEST 6

RESPONSIBLE PARTY: Michelle Carpenter

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

Response 6a. EKPC utilizes Account 355000, Poles and Fixtures – Transmission Plant, to record all poles placed in service, which is consistent with the RUS Uniform System of Accounts. Subaccounts are not utilized.

Request 6b. 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.

Response 6b. Account 355000 includes the cost of materials, labor, benefits, and overheads associated with the installation of transmission poles and fixtures. The resulting assets in this account consist of wood and steel poles with vintages from 1967 to 2021 and fixtures used

for supporting the overhead transmission lines, such as anchor guy assemblies, crossarms and braces.

Request 6c. Provide an Excel spreadsheet with all formulas, rows, and columns unprotected and fully accessible showing the plant in service balance of each such account at the end of each of the last five fiscal years.

Response 6c. Please refer to the summary below and corresponding Excel file *PSC DRI Response 6c.xlsx* for the balance of Account 355000, Poles and Fixtures – Transmission Plant, for each of the last five years.

	Balance 12/31/2021	Balance 12/31/2020	Balance 12/31/2019	Balance 12/31/2018	Balance 12/31/2017
Poles & Fixtures-Transmission Plant	<u>\$ 178,124,827</u>	<u>\$ 157,775,914</u>	<u>\$ 150,851,436</u>	<u>\$ 148,734,704</u>	<u>\$ 142,035,741</u>

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. PSC CASE NO. 2022-00106
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COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 04/22/22

REQUEST 7

RESPONSIBLE PARTY: Michelle Carpenter

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

Response 7a. EKPC maintains one accumulated depreciation account, Account 108500, Accumulated Depreciation – Transmission Plant., for all in-service depreciable transmission assets, including poles.

Request 7b. Provide a narrative description of how the accumulated depreciation in each such account is calculated.

Response 7b. Each month the fixed asset system calculates depreciation for in-service transmission assets based upon the asset's original cost multiplied by 1/12 of the annual depreciation rate for its respective general ledger plant account, as prescribed by EKPC's most recent depreciation study. The result is then posted to depreciation expense and Account 108500, Accumulated Depreciation – Transmission Plant.

Request 7c Identify the corresponding plant account or accounts for each account in which accumulated depreciation for poles is recorded.

Response 7c. In addition to Account 355000, Poles and Fixtures – Transmission Plant, the following transmission plant accounts record depreciation to Account 108500, Accumulated Depreciation – Transmission Plant:

Account Number	Description
353000	Station Equipment
353010	Station Equipment-Energy Control System
354000	Towers and Fixtures
356000	Overhead Conductors/Devices
359000	Roads and Trails

Request 7d. Provide an Excel spreadsheet with all formulas, rows, and columns unprotected and fully accessible showing the balance of each such account at the end of each of the last five fiscal years.

Response 7d. Please refer to the summary below and corresponding Excel file *PSC DRI Response 7d.xlsx* for the balance of Account 108500, Accumulated Depreciation—Transmission Plant for each of the last five years. As discussed in 7c, this balance includes accumulated depreciation for all in-service depreciable transmission assets.

	Balance 12/31/2021	Balance 12/31/2020	Balance 12/31/2019	Balance 12/31/2018	Balance 12/31/2017
Accumulated Depreciation-Transmission Plant	<u>\$ 236,957,192</u>	<u>\$ 228,047,657</u>	<u>\$ 221,082,673</u>	<u>\$ 213,381,155</u>	<u>\$ 204,087,188</u>

EAST KENTUCKY POWER COOPERATIVE, INC.
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COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED 04/22/22

REQUEST 8

RESPONSIBLE PARTY: Michelle Carpenter

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

Response 8a. The depreciation rate currently used for Account 355000, Poles and Fixtures – Transmission, is 2.82%

Request 8b. Identify the case in which each such depreciation rate was set.

Response 8b. EKPC's depreciation rates were approved as part of the rate case, Case No. 2021-00103, with an effective date of October 1, 2021.

Request 8c. Identify the useful lives of the poles used to calculate each such depreciation rate.

Response 8c. The depreciation study used an estimated useful life of 60 years for poles and fixtures.

**EAST KENTUCKY POWER COOPERATIVE, INC.
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FIRST REQUEST FOR INFORMATION RESPONSE**

**COMMISSION STAFF'S FIRST INFORMATION REQUEST DATED
REQUEST 9**

RESPONSIBLE PARTY: Denver York

Request 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.

Response 9. A breakdown of the total number of distribution poles on EKPC's system by the year they were installed is included in the attached Excel file *PSC DRI Response 9 - Total Number of Distribution Poles By Installation Year.xlsx*.

EAST KENTUCKY POWER COOPERATIVE, INC.
PSC CASE NO. PSC CASE NO. 2022-00106
FIRST REQUEST FOR INFORMATION RESPONSE

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REQUEST 10

RESPONSIBLE PARTY: Denver York

Request 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.

Response 10. A breakdown of the total number of transmission poles on EKPC's system by the year they were installed is included in the attached Excel file *PSC DRI Response 10 - Total Number of Transmission Poles By Installation Year.xlsx*. EKPC does not currently have birthmark data for all poles on the system so the information EKPC is providing represents the original installation dates of the line sections the poles are utilized on. A number of the poles included in the data have been replaced since their original installation. EKPC currently has an initiative in place to capture birthmark data for all poles on the system during the next 4-year cycle of routine line inspections.

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REQUEST 11

RESPONSIBLE PARTY: **Denver York**

Request 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.

Response 11. EKPC completes scheduled routine inspections of its transmission and distribution poles to assess their condition utilizing four different types of inspections methods. These methods include a foot patrol, an aerial patrol, ground-line, and aerial infrared thermography. Routine inspections are completed to identify any anomalies and aid in the assessment of the condition of the poles and any associated hardware components. Any issues identified during the routine patrols are documented in EKPC's computer maintenance management system by creating a work order.

- A foot patrol inspection is a visual inspection from the ground. These inspections are accomplished by walking or riding in vehicles along the length of the line sections. Foot patrol inspections are completed once every 4 years.
- An aerial patrol inspection is a visual inspection from a helicopter flying above the line. Aerial patrol inspections focused on the line equipment are completed on an annual basis.

- A ground-line inspection is a visual inspection of wood poles only focusing on the portion of the pole between three feet below to eight feet above ground level. Ground-line inspections are completed once every 12 years.
- An aerial infrared thermography inspection is conducted from a helicopter utilizing an infrared sensor mounted on the helicopter. Any “hot spots” that are identified could indicate anomalies with the poles and any associated hardware. Aerial infrared thermography inspections are completed once every 4 years.

Other inspection methods are utilized as a follow-up to the routine inspections on an as-needed basis to further assess the condition of the poles and determine appropriate repair or replacement activities. These include climbing, foundation, corona, ground-level infrared thermography, or drone.

All of the inspection methods discussed above can be utilized after occurrence of a line outage to assess the location and extent of the damage and aid in the development of a plan for restoring service to customers.

Work plans for repairing and/or replacing poles are developed by periodically reviewing the identified work orders and prioritizing them according to specific criticality categories.

EKPC is providing a copy of its internal procedure “Transmission Lines Inspection Practices” separately and is subject to a request for confidential treatment.

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REQUEST 12

RESPONSIBLE PARTY: Isaac S. Scott

Request 12. State whether new attachers will be subsidizing other utility customers by paying the full cost to replace a utility pole that is not a red tagged pole when the replacement pole has a longer useful life than the pole that is replaced, and explain each basis for the response.

Response 12. It should be noted that new attachers to existing utility poles that are not being replaced are in essence being subsidized by other utility customers who bear the costs of investment and maintenance of those utility poles. Consequently, if the new attacher is causing the early retirement of an existing utility pole that was not "red tagged", then the new attacher should bear the full cost of replacement of the utility pole. This is not a question of the new attacher subsidizing other utility customers, but a question of the proper application of cost causation concepts.

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REQUEST 13

RESPONSIBLE PARTY: **Mary Jane Warner**

Request 13. Explain how it would affect capital planning and the ability to complete other necessary projects if utilities were required to cover the cost of every pole that had to be replaced to accommodate a new attacher less the underappreciated value of the pole being replaced.

Response 13. In general, it will be impossible to predict the number of poles that might be solicited for attachment in future budgets/capital plans, and since design will be unique to each situation/request, the scope of work and related cost could only be known upon evaluation of each specific request. EKPC's proposed tariff excludes 69kV and all higher voltage transmission poles, and since there are very few poles carrying lines at voltages less than 69kV on the EKPC system, the impact would be inconsequential to our normal capital planning cycles.

However, should transmission poles 69kV and higher be required for inclusion in an attachment tariff, the impacts to capital planning and other projects would be significant. For example, raising

just one transmission pole for an attachment can result in the need to modify adjacent structures to meet current minimum design criteria, even though the adjacent structures do not have attachments. Both new and replacement transmission line projects are planned years in advance of the start of construction. Capital planning is based on preliminary scope and design that is intended to optimize structure locations, configurations, and cost effectiveness and minimize impact to property owners. Standard EKPC transmission lines are not designed or estimated for underbuild attachments of any kind. Provision for an additional cable mounted on transmission poles and below the transmission conductors would normally require taller poles and shorter spans and result in higher costs and more impact to the affected property owners than a standard design. Pre-construction activities for transmission lines can include, but may not be limited to, environmental studies and approvals, regulatory approvals, property rights acquisition, aggregate contracting to achieve attractive pricing for materials and labor, and outage coordination/approvals. Considering the normal timeline that requires significant lead-time for planning and a defined scope very early in the process, it is unlikely that attachers would be willing or able to plan ahead, commit to commercial terms, make payment, and wait on the process required to plan and build a new transmission line before having access to the structures. EKPC also cannot acquire easement rights on behalf of another, so all requisite communication easements would have to be acquired independently by the attacher and in such a way as to not interfere with EKPC's efforts to acquire an electric transmission easement. For any transmission facility, the best way to determine the incremental cost of attachment is to develop one design with no attachment and one design with attachment. The difference in the two total project cost estimates

would be attributable to the attachment. Resources necessary for design, materials, transmission planning, construction, project management, and outage coordination are managed around the projected capital portfolio and would not be adequate to also cover ad hoc requests of this nature. The likely result is that EKPC would need to either add resources in anticipation of attachment work load that may or may not be used otherwise or cut other capital projects to be able to accommodate this demand. Aside from the risk that attachments can pose to the reliability of the transmission grid, the cost and disruption to manage them would be significant and detrimental to EKPC.

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REQUEST 14

RESPONSIBLE PARTY: Mary Jane Warner

Request 14. Describe in detail the issues with pole loading that arise from overlashing including how wind and ice affect pole loading, and explain the technical bases for such contentions.

Response 14. This response assumes that overlashing is done only when an existing communication cable installed below conductors is used for physical support of a cable that is added by lashing. First, EKPC has no communication cables on its transmission poles to which another cable could be lashed. However more generally, design standards require that transmission poles be designed to withstand specific loads related to ice and wind. The addition of another cable as described adds the weight of the new cable and the lashing. The increased diameter of any cable or conductor is also directly related to the applied force on a pole as a result of prescribed wind or ice loading. The larger the diameter of cables/conductors, the more ice can be collected and the more wind loading is experienced due to the wider profile. The resulting forces from wind and/or ice on the cables are weight (vertical), and overturning (horizontal) which are transferred to the pole(s) at the connection points. Should communication cables ever be attached to

transmission poles, overlashing or any load added on a transmission structure must be evaluated by a qualified engineer on a case-by-case basis to assure structural integrity and to prevent reliability issues from developing.

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REQUEST 15

RESPONSIBLE PARTY: Isaac S. Scott

Request 15. Explain how the amount of the administrative review fee for completeness was determined, and provide any documentation or analysis supporting the amount of that fee.

Response 15. EKPC's proposed tariff does not include an administrative review fee provision. Therefore, no response is necessary.

EAST KENTUCKY POWER COOPERATIVE, INC.
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REQUEST 16

RESPONSIBLE PARTY: Isaac S. Scott

Request 16. Explain how the estimated pole survey costs in your proposed tariff were determined, and provide any documentation or analysis supporting the estimate.

Response 16. EKPC's proposed tariff does not include an estimated pole survey cost provision. Therefore, no response is necessary.

EAST KENTUCKY POWER COOPERATIVE, INC.
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REQUEST 17

RESPONSIBLE PARTY: Isaac S. Scott

Request 17. Provide justification for the unauthorized attachment fee of five times the current annual fee.

Response 17. EKPC's proposed tariff does not include an unauthorized attachment fee provision. Therefore, no response is necessary.

EAST KENTUCKY POWER COOPERATIVE, INC.
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REQUEST 18

RESPONSIBLE PARTY: Isaac S. Scott

Request 18. Regarding payments not made on time:

Request 18a. Explain the reasoning and justification for charging interest at 1.5 percent per month instead of establishing a late payment charge.

Request 18b. Explain whether the interest charged on any balance that remains unpaid would be simple or compound interest.

Request 18c. Explain why 807 KAR 5:007, Section 9(3)(h) which states that a late payment charge may be assessed only once on a bill for rendered services, would not apply to the interest charge.

Response 18a-c. EKPC's proposed tariff does not include a late payment charge provision. Therefore, no response is necessary.

EAST KENTUCKY POWER COOPERATIVE, INC.
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REQUEST 19

RESPONSIBLE PARTY: Isaac S. Scott

Request 19a. Explain what the performance bond required by Article XXI and Appendix D of the proposed tariff is intended to secure.

Request 19b. Explain whether there is a market for such performance bonds, including specifically whether there is a market for performance bonds that secure “the payment by the Licensee of any damages, claims, liens, taxes, liquidated damages, penalties, or fees due to Cooperative.”

Request 19c. Explain why it would not be duplicative to require an attacher to maintain performance bonds that secure “the payment by the Licensee of any damages, claims, liens, taxes, liquidated damages, penalties, or fees due to Cooperative” while also maintaining the required insurance coverages and listing the utility as an additional insured on the policies.

Request 19d. Explain how the amount of the performance bond was determined.

Response 19a-d. EKPC's proposed tariff does not include a performance bond provision. Therefore, no response is necessary.

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REQUEST 23

RESPONSIBLE PARTY: Mary Jane Warner

Request 23. For East Kentucky Power Cooperative (EKPC) only:

Request 23a. Refer to the March 18, 2022 cover letter to EKPC's proposed tariff filing. Explain why Commission approval of the proposed tariff is required prior to developing an application for attachment owners to submit and contract for any approved attachments.

Response 23a. EKPC's tariff filing is consistent with other Transmission Owners in excluding attachments to transmission poles at voltages equal to or greater than 69kV. The Commission approval of the proposed tariff will focus development of any application or contract details on only the relevant issues for sub-transmission poles owned by EKPC. As noted in Response 9 above, the total number of sub-transmission poles owned by EKPC is very small and likely to be unattractive to attachers.

Request 23b. Refer to EKPC’s proposed tariff, P.S.C. No. 35, Original Sheet No. 102. Explain why a per pole estimate of survey costs is not included in the proposed tariff seeing as requesting attachment owners are required prepay estimated modification costs.

Response 23b. The term “survey” is assumed to mean the actual collection of spatial data related to a pole modification as opposed to only a site visit and visual assessment by a company representative or contractor. EKPC’s poles (any voltage) are not designed for communication underbuilds and a blanket estimate of an outsourced service and evaluation would need to be very conservative to assure proper compensation. EKPC’s intent is to provide a case by case estimate of the survey/assessment cost for deposit prior to the work, and to reconcile any balance to the actual cost by refund or additional payment.

Request 23c. Refer to EKPC’s proposed tariff, P.S.C. No. 35. Original Sheet No. 102. Explain why the attachment charges and terms and conditions of service are not included in the proposed tariff and why they will be determined on case-by-case basis.

Response 23c. As noted in many other responses to this data request, EKPC does not operate lines that are typical distribution construction. Transmission lines designed for voltages of 69kV and above are not well suited to accommodate communication cable underbuilds and generating a single fair and consistent rate for attachment charges and common terms and conditions of service is not practical or reasonably implementable.