

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

CUMBERLAND VALLEY ELECTRIC, INC.'S
RESPONSE TO THE KENTUCKY BROADBAND AND CABLE ASSOCIATION'S
SUPPLEMENTAL REQUESTS FOR INFORMATION

Cumberland Valley Electric, Inc. (“Cumberland Valley” or the “Cooperative”), by counsel, files its Response to the KBCA’s Supplemental Requests for Information, issued in the above-captioned case on May 19, 2022.

FILED: June 2, 2022

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

CUMBERLAND VALLEY ELECTRIC, INC.'S
RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

REQUEST NO. 2-1: 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: A new attacher would need to request the date of replacement of the pole from its owner in order to determine its potential for Red Tag status as regards the attacher’s request for attachment. Please also see CVE’s response to KBCA’s Initial Request for Information Request 1-8.

Witness: Rich Prewitt, Director of Economic Development and Marketing

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REQUEST NO. 2-2: 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: Please see CVE's response to KBCA's Initial Request for Information Request 1-8.

Witness: Rich Prewitt, Director of Economic Development and Marketing

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REQUEST NO. 2-3: Identify the average amount of time You spend per pole on a pre-construction survey.

RESPONSE: CVE believes 30 minutes per pole is a reasonable estimation for pre-construction survey work, although there is other work involved with processing pole attachment requests.

Witness: Rich Prewitt, Director of Economic Development and Marketing

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REQUEST NO. 2-4: Confirm You will not charge an annual rental rate for overlashed facilities.

RESPONSE: Confirmed.

Witness: Rich Prewitt, Director of Economic Development and Marketing

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REQUEST NO. 2-5: Provide any data related to Your contention that “demand for overloading/additional load on poles will be much greater over the next 5-10 years than ever before,” including any projections of any increase in overloading for the area You serve. See Response to KBCA RFI 1-2.

RESPONSE: The federal government has already awarded over \$4 million in rural broadband subsidies in counties served by CVE. We project this to lead to 2,279 new attachments in our service territory without including any available state or future federal awards. Because third party overloading is not allowed under our current CATV tariff, we have no projection for the potential mix of overloading to new contact attachments.

Witness: Rich Prewitt, Director of Economic Development and Marketing

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REQUEST NO. 2-6: Identify the specific costs, in dollars, incurred by You in connection with overloading that You claim are not recovered from the overloading attacher. See Response to KBCA RFI 1-5.

RESPONSE: If the overloading attacher submits the required engineering plans and pole loading analysis with their overloading notification, we do not claim that there will be unrecovered costs as a result of overloading.

Witness: Rich Prewitt, Director of Economic Development and Marketing

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REQUEST NO. 2-7: Identify the amount of money, in dollars, that electric cooperatives or their members have incurred each year for the past five years as a result of third party communications attachments that are not covered by non-recurring charges, such as pre-construction survey fees, make ready charges, or recurring annual rental payments from attachers.

RESPONSE: Please see CVE's response to KCBA RFI No. 13(a), which states that such costs are not tracked. Therefore, CVE cannot provide five years of data.

The cooperative cannot accurately provide the attacher's avoided costs for the past 5 years because the Cooperative was not set up to track these costs separately, and the small amount of permit requests submitted did not justify setting up a separate system.

Witness: Rich Prewitt, Director of Economic Development and Marketing

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VERIFICATION

I, Rich Prewitt, verify, state, and affirm that the information request responses filed with this verification for which I am listed as a witness are true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.



Rich Prewitt

Director of Marketing, Economic Development,
Member Services and Safety
Cumberland Valley Electric, Inc.

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF)

SUBSCRIBED AND SWORN TO before me on this the 24 day of May, 2022.

My commission expires: 4-11-2026


Notary Public