

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

FARMERS RURAL ELECTRIC COOPERATIVE CORPORATION'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: For any unmarked poles, the attacher would have to rely upon the Cooperative’s review of the application or make a specific request for information. For each application, poles identified for attachment are reviewed against known utility projects, those red-tagged for maintenance, and otherwise.

Witness: Chuck Bishop, P.E. and Vice President of Engineering

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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: Poles identified to be replaced for maintenance purposes typically have a red tag nailed to the pole.

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

RESPONSE: Typically, 10 poles can be surveyed per hour. This does not include travel time or time required for administrative work.

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

RESPONSE: The existing billable attachments upon which the overlashed facilities are supported have an annual rental charge. But, the overlashed facilities themselves (provided they are made consistent with the regulation and the proposed tariff) do not have an annual rental charge.

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

RESPONSE: There are many local, state, and federal initiatives to expand broadband and broadband access to areas of Kentucky. Many of the unserved or underserved areas are in the rural communities we serve. A lot of these areas have existing facilities which are incapable of serving the existing demand. Given the Commission's decision to permit certain overlashing at no additional charge, it is realistic to anticipate that providers will seek to add capacity and capabilities via overlashing. When coupled with the broadband-related subsidies appropriated for Kentucky, it is reasonable to expect an increased likelihood of overlashing.

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

RESPONSE: Farmers does not keep records related to these costs. Poles are designed to carry a certain amount of load. The pole will have an overload capacity factor that may/may not allow for additional loading, including overlashing. Additional weight and surface area add stress to poles, thereby shortening the life of the average pole. Costs from resultant damages and repairs are not recovered. The same is true for any administrative/recordkeeping tasks associated with ensuring accurate system records and the evaluation of materials submitted in connection with an overlash.

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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: An amount cannot be specified, as billable units not identified in the Cable Television Tariff were not tracked specifically.

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