

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

GRAYSON 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: If a pole does not have a tag or ribbon attached, the pole is determined to be OK until tested. An untagged pole is not designated for replacement.

Witness: Robert Brown, GIS Technician

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

GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

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: Grayson marks “red-tagged poles” with a red pole tag from our contractor or a red ribbon tied on the pole. A yellow tagged pole signifies that a pole is presently fine but may need to be retested in one to five years.

Witness: Robert Brown, GIS Technician

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

GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

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

RESPONSE: Approximately 30 minutes per pole.

Witness: Robert Brown, GIS Technician

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

GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

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

RESPONSE: Overlashing is not subject to annual rental fees if it is an overlash on an existing communications wire consistent with the applicable regulations and our proposed tariff provisions.

Witness: Bradley Cherry, President and CEO

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

GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

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: Wireline attachers have been awarded \$7,942,139 in federal subsidies for rural broadband deployment in counties served by Grayson. We project this to translate to 4,364 new attachments over the next 6-year period. Historically, Grayson has not allowed third party overloading, so there is no existing data to project the anticipated mix of new attachments and overloading.

Witness: Bradley Cherry, President and CEO

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

GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

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: Grayson does not currently have a record of any costs not recovered from an overlashing attacher; however, it is certainly possible that there may be unknown overlashing on Grayson's poles. As long as the attacher follows the requirements in the proposed tariff to supply or cover the cost of initial engineering analysis to ensure the overlashing does not compromise the safety and reliability of the pole, the Cooperative is not making any claims that it has unrecovered costs from the overlashing attacher.

Witness: Bradley Cherry, President and CEO

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

GRAYSON RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

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: If the attacher follows the requirements in the proposed tariff to supply or cover the cost of initial engineering analysis and pays the required fees in a timely manner, the Cooperative is not making any claims that it will have unrecovered costs from attachers.

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 relatively small number of permit requests did not justify setting up a separate system. The only non-recurring costs passed along to the attacher were for necessary make-ready to allow for their proposed attachments. Any review or engineering costs would have been incurred at the expense of the Cooperative and its members.

KBCA members should have excellent data to answer this question, as they know how many attachments they made over the past five years and how many of those attachments were submitted through the required permitting processes.

Witness: Bradley Cherry, President and CEO

