

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

**In the Matter of:**

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

**BIG RIVERS ELECTRIC CORPORATION'S**  
**RESPONSE TO THE KENTUCKY BROADBAND AND CABLE ASSOCIATION'S**  
**SUPPLEMENTAL REQUESTS FOR INFORMATION**

Big Rivers Electric Corporation (“Big Rivers” 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

BIG RIVERS ELECTRIC CORPORATION'S RESPONSE TO THE KBCA'S  
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**REQUEST NO. 2-1:** Explain how a new attacher would determine whether a pole was “[d]esignated for replacements 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:** As described in Big Rivers’ responses to Items No. 7 and No. 11 of the Commission Staff’s First Request for Information, Big Rivers inspects 20% of its poles each year as part of a five year cycle inspection plan. If the poles on which a new attacher requests to install attachments have not been inspected within the prior two years during a scheduled routine inspection or other inspection, then the pole(s) would not have been designated for replacement or visibly marked. Any pole designated for replacement will be marked.

**Witness:** Christopher S. Bradley, VP of System Operations

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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 Big Rivers' response to Item No. 8 of the Commission Staff's First Request for Information in this matter. Once a pole is identified by the inspector to be red-tagged, the inspector will place a red-tag or yellow marker at the base of the pole signifying the pole is red-tagged at the time of the inspection.

**Witness:** Christopher S. Bradley, VP of System Operations

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

**RESPONSE:** The amount of time for pre-construction surveys would include travel time to and from the office to site, the field survey, and office work. Since travel time is an unknown variable, Big Rivers would assume 4 hours round trip to travel from our central office to the furthest east or west of our transmission system. A pre-construction survey for one pole would take approximately one hour of time. Recovering the data, modeling, and analysis in the office could take approximately 2-3 hours. In total, 8 hours would be the amount of time estimated per pole for a pre-construction survey. If multiple pole surveys were conducted at one time or if the locations to survey were closer to our central office, the amount of time per pole for pre-construction surveys would be reduced.

**Witness:** Christopher S. Bradley, VP of System Operations

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

**RESPONSE:** See Big Rivers' response to Item No. 3 of the Commission Staff's First Request for Information. It is not Big Rivers' intention to charge an annual rental rate for overlashed facilities.

**Witness:** Christopher S. Bradley, VP of System Operations

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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:** As stated in Big Rivers' response to Item No. 2 of KBCA's First Request for information, approximately \$1 billion in broadband subsidies have been appropriated for rural areas in Kentucky. Big Rivers' transmission lines provide wholesale electric power to three distribution cooperative members across 22 counties in western Kentucky.

**Witness:** Christopher S. Bradley, VP of System Operations

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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:** Big Rivers does not claim that it has incurred costs in connection with overlashing in the past, as there currently is no overlashing on Big Rivers' transmission poles. However, it is not Big Rivers' intention to charge an annual rental rate for overlashed facilities. The reality of overlashing is that it creates a communications cable that is heavier, with an increased surface area compared to the original conductor that it is lashed upon. This added weight and cross-sectional surface creates additional stress and burden on the poles, and it can cause greater sag in the wire. Also, inspection of poles with attachments and overlashing takes more time.

**Witness:** Christopher S. Bradley, VP of System Operations

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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:** Big Rivers is unaware of any published data and does not track the amount of money all electric cooperatives or their members incur under the stated circumstances.

**Witness:** Christopher S. Bradley, VP of System Operations



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**VERIFICATION**

I, Christopher S. Bradley, 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.



Christopher ("Chris") S. Bradley  
Vice President of System Operations  
Big Rivers Electric Corporation

COMMONWEALTH OF KENTUCKY    )  
  ) ss:  
COUNTY OF    )

SUBSCRIBED AND SWORN TO before me by Christopher S. Bradley on this the 2 day of June, 2022.

My commission expires: 1-14-2026

*ID# KYNP43026*

  
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Notary Public