

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)	

BIG SANDY RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSE TO THE KENTUCKY BROADBAND AND CABLE ASSOCIATION'S
SUPPLEMENTAL REQUESTS FOR INFORMATION

Big Sandy Rural Electric Cooperative Corporation (“Big Sandy” 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 SANDY 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: With any request to attach to a pole or series of poles, Big Sandy would provide the requesting entity with a list of poles scheduled to be changed.

Witness: Jeff Prater, VP 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: A pole marked with a "red-tag" would be considered as priority replacement due to the physical condition. Any pole scheduled to be changed in less than 2-years will be marked with orange ribbon and/or tag.

Witness: Jeff Prater, VP 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: Big Sandy estimates that a pre-construction survey, and post construction survey would last approximately 6 minutes per pole. Travel time to jobsite would equal an average of 30 minutes each way. Please note; this would simply be a pre-construction survey to make sure there are no problems along the route an attacher is requesting to use. Actual engineering and staking is not included in this cost.

In addition, a staking tech would need to spend office time reviewing the application and locating the request on Big Sandy's mapping system, as well as preparing all necessary materials needed to be taken on the preconstruction survey.

After the field visit, the tech would be required to record his findings and notify the Line Superintendent. Upon Superintendent's approval, the tech would then need to notify the attacher and record the response.

Witness: Jeff Prater, VP Operations

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

RESPONSE: Big Sandy will not charge additional annual rental for overlashed facilities.

Witness: Jeff Prater, VP Operations

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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: Wireline attachers have been awarded \$2,084,064 in federal subsidies for rural broadband deployment in counties served by Big Sandy. We project this to translate to 1,145 new attachments over the next 6 year period. Historically, Big Sandy has not allowed third party overloading so there is no existing data to project what the mix of new contact attachments to overloading.

Witness: Jeff Prater, VP Operations

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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: As long as the overloading attacher provides the engineering documentation and pole loading analysis required by the new tariff, we do not claim that there will be unrecovered costs.

Witness: Jeff Prater, VP 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 Sandy has no recorded amounts, but this does not mean that we have no costs. Big Sandy staff members spend time reviewing the permit submittals which is currently not billed to attachers. This is intended to be covered by the survey fee under the new tariff. The only bills attachers currently receive are for make ready construction costs and annual rental rate. This also assumes no attachers have attached to Big Sandy poles without submitting a permit request, which would make it impossible to measure costs.

Witness: Jeff Prater, VP Operations

