

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)	

BLUE GRASS ENERGY ELECTRIC COOPERATIVE CORPORATION'S
RESPONSE TO THE KENTUCKY BROADBAND AND CABLE ASSOCIATION'S
SUPPLEMENTAL REQUESTS FOR INFORMATION

Blue Grass Energy Electric Cooperative Corporation (“Blue Grass” 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

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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: Attachers should be submitting requests to attach with a pole loading analysis (PLA) for each of the requested poles. In reviewing the PLA, the Cooperative looks at both the existing load on the pole and the effect of the requested attachments. For any pole that passes pole loading with the existing equipment and fails after adding the new attachment, the party requesting the attachment is responsible for the make-ready costs (pole replacement or other make ready).

Witness: Kyle Lancaster, Manager, 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 that have failed inspection will be marked with a red tag.

Witness: Kyle Lancaster, Manager, Engineering

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

RESPONSE: Office work – 2 hours per request

Travel Time – .75 per request

Field Time – .10 hours per pole

This time is solely for the preconstruction survey

Witness: Kyle Lancaster, Manager, Engineering

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

RESPONSE: Blue Grass Energy will not charge an annual rental rate for overlashed facilities.

Witness: Kyle Lancaster, Manager, Engineering

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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: The Federal government has already announced \$28 million dollars to subsidize broadband deployment in the counties served by Blue Grass Energy. We project this to account for an increased demand of 15,169 attachments on the Cooperative over the next 6 years. The Cooperative has received requests for new attachments to over 1,500 poles on its system in the past 6 months. It is impossible to project what the exact mix of overlashing to new contact attachments will be when third-party overlashing is allowed. We are predicting a significant additional load from both overlashing and new attachments over the next 5-10 years.

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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: Any pole that previously passed Pole Loading Analysis and then fails the same test with the overlashed facilities, requiring a pole change, has the potential to become an unrecovered cost. Particularly if multiple parties are allowed to overlash without notice, this pole change-out would not take place at the time of overloading but at a later time, at which point the cost would fall solely on the Cooperative.

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 overloading does not compromise the safety and reliability of the pole, the Cooperative is not making any claims that it has unrecovered costs from the overloading attacher.

Witness: Kyle Lancaster, Manager, Engineering

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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: 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.

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VERIFICATION

I, Kyle Lancaster, 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.

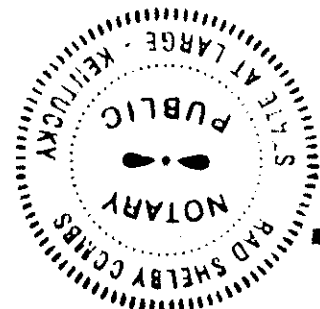
Kyle Lancaster

Kyle Lancaster
Manager, Engineering
Blue Grass Energy Cooperative Corporation

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF *Tessamine*)

SUBSCRIBED AND SWORN TO before me on this the 1st day of June, 2022.

My commission expires: June 21, 2025



Rad Shelby Coombs KYNP 28263

Notary Public