

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)	

CLARK ENERGY COOPERATIVE, INC.'S
RESPONSE TO THE KENTUCKY BROADBAND AND CABLE ASSOCIATION'S
SUPPLEMENTAL REQUESTS FOR INFORMATION

Clark Energy Cooperative, Inc. ("Clark Energy" 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

CLARK ENERGY COOPERATIVE, INC.'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: An attacher will learn this by submitting an attachment request. Any pole currently designated for replacement regardless of the reason will be referenced during the field survey.

Witness: Todd Peyton, Vice President, Engineering

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

CLARK ENERGY COOPERATIVE, INC.'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: Poles that are tagged in the field are marked with orange paint, orange ribbon, and a square metal tag nailed into the pole.

Witness: Todd Peyton, Vice President, Engineering

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

CLARK ENERGY COOPERATIVE, INC.'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: See response to Request No. 16 in the Commission Staff's First Request for Information.

Witness: Todd Peyton, Vice President, Engineering

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

CLARK ENERGY COOPERATIVE, INC.'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: See the response to Request No. 3 in Commission Staff's First Request for Information.

Witness: Todd Peyton, Vice President, Engineering

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

CLARK ENERGY COOPERATIVE, INC.'S
RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

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: Third party wireline attachers have been awarded \$18,451,616 in federal subsidies for rural broadband deployment in counties served by Clark Energy. We project this to result in 10,138 new attachments over the next 6 years. This will increase the load on poles significantly, but we have not yet found any sample cases of third party overlashing to project the mix of overlashing to new contact attachments with any confidence. Third party overlashing is not allowed under the CATV tariff we have in effect currently.

Witness: Todd Peyton, Vice President, Engineering

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

CLARK ENERGY COOPERATIVE, INC.'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 overloading that You claim are not recovered from the overloading attacher. See Response to KBCA RFI 1-5.

RESPONSE: If the overloading attacher submits the required engineering plans and pole loading analysis with their overloading notification, we do not claim that there will be unrecovered costs as a result of overloading.

Witness: Todd Peyton, Vice President, Engineering

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

CLARK ENERGY COOPERATIVE, INC.'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: The only costs we have recovered from third party attachers over the past five years are annual rental rates and make ready construction costs. We have received a small number of permit requests over the past five years, and the cost of reviewing and surveying new attachments has been covered by the Cooperative and its members, although we do not have specific records of this amount, as it was not work that we have historically tracked. This also assumes no attachers have attached to Clark Energy poles without submitting a permit request, which would make it impossible to measure costs.

Witness: Todd Peyton, Vice President, Engineering

