

**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>	)	

**FLEMING-MASON ENERGY COOPERATIVE, INC.'S  
RESPONSE TO THE KENTUCKY BROADBAND AND CABLE ASSOCIATION'S  
SUPPLEMENTAL REQUESTS FOR INFORMATION**

Fleming-Mason Energy Cooperative, Inc. (“Fleming-Mason” or the “Cooperative”), by counsel, files its responses 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

FLEMING-MASON 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:** The only planned replacement would be on pole(s) that have failed an inspection. Those poles would be marked with a colored tag or ribbon.

**Witness:      Brandon Hunt, Manager of Engineering & Operations**

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

FLEMING-MASON 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:** Yes, “Red-tagged poles” will be marked with colored ribbons. Those colors could be red or orange ribbons. Both colors would signify a “Red-tagged pole”.

**Witness:      Brandon Hunt, Manager of Engineering & Operations**

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

FLEMING-MASON 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:** This time would vary widely depending upon the location of the pole. Drive time and terrain would be two large factors in FME's service territory.

**Witness:      Brandon Hunt, Manager of Engineering & Operations**

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

FLEMING-MASON 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:** It is not the intention of the Cooperative to charge an annual rental rate for overlashed facilities.

**Witness:      Brandon Hunt, Manager of Engineering & Operations**

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

FLEMING-MASON 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 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:** The mere nature of the overloading questions received to date from KBCA indicates that the demand for overloading will be greater over the next 5-10 years. It is no secret that all communication companies have stated that they are gearing up for a large broadband push into rural communities. Millions of dollars in federal subsidies for third-party wireline attachers have already been announced in counties served by Fleming-Mason. Cooperatives are the majority pole owners in these rural communities. Overloading will be a percentage of this large increase in communication installations. Therefore, cooperatives will see a much greater increase over the next 5-10 years.

**Witness:      Brandon Hunt, Manager of Engineering & Operations**

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

FLEMING-MASON 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:** Specific cost, in dollars, is not a record kept or maintained by the Cooperative. As mentioned in KBCA RFI 1-1,1-4,1-5, additional weight and surface area add stress to poles, thereby shortening the life of the average pole. These costs from damages and repairs are not recovered.

**Witness:      Brandon Hunt, Manager of Engineering & Operations**

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

FLEMING-MASON 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 amount of money, in dollars, is not kept or maintained. While some charges are recovered from preconstruction surveys, make ready charges, or recurring annual rental payments, it does not cover the true burden a third-party attacher can impose on the Cooperative. Broken poles as a direct result of the added stress caused by third-party attachments are time-consuming and costly to the Cooperative. Those broken poles could result from, among other things, a tree that breaks two poles only because the weight of the tree could not break the additional third party cables; a low clearance situation where a third party cable is hit by a vehicle; or an improperly installed third-party anchor that adds stress to a pole, causing it to break or need replacement.

**Witness:      Brandon Hunt, Manager of Engineering & Operations**



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

FLEMING-MASON ENERGY COOPERATIVE, INC.'S  
RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

**REQUEST NO. 2-12:** To Fleming Mason Energy Cooperative, Inc. only: Your response to KBCA's RFI 1-13(a) references an Exhibit 13(a). No such exhibit was filed with the Commission. Please provide it.

**RESPONSE:** Please see attached Exhibit 2-12.

**Witness:      Brandon Hunt, Manager of Engineering & Operations**

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

FLEMING-MASON ENERGY COOPERATIVE, INC.'S  
RESPONSES TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

VERIFICATION


I, Brandon Hunt, 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.



Brandon Hunt  
Manager of Engineering & Operations  
Fleming-Mason Energy Cooperative, Inc.

COMMONWEALTH OF KENTUCKY    )  
  ) ss:  
COUNTY OF                                 )

SUBSCRIBED AND SWORN TO before me on this the 2<sup>nd</sup> day of June, 2022.  
My commission expires: 12/22/22

  
\_\_\_\_\_  
Notary Public                    ID 613088