

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

INTER-COUNTY ENERGY 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: A new attacher would know that a pole has failed the inspection program and that the pole was subject to replacement within the next 2 years from a red circular tag affixed to the pole at a height between 5’ and 6’ which signifies a priority reject pole. Any pole that is scheduled to be replaced for reasons other than the pole inspection will be wrapped with red flagging tape.

Witness: David Phelps, VP Engineering and 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: The Cooperative visually marks all "Red-tagged poles" with either a round red metal tag or a red staking ribbon. Any pole that is inspected by the third-party testing company will also secure to the pole a round silver tag stating the year of the test. The Cooperative does not use any other color marking tags.

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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 Cooperative does not have records of actual time per pole on a pre-construction survey. However, as stated in Inter-County Energy's Survey Costs per pole, it is estimated that during a Pre-Construction Survey the engineer can review 10 poles per hour with a travel time adder of 1 hour. This estimate does not include required administrative review and recordkeeping time.

Witness: David Phelps, VP Engineering and Operations

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

RESPONSE: No annual rental fee will be charged for overlashing consistent with the regulation and the proposed tariff.

Witness: David Phelps, VP Engineering and 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 \$28,430,158 in federal subsidies for rural broadband deployment in counties served by Inter-County. We project this to translate to 15,621 new attachments over the next 6-year period. Historically, Inter-County has not allowed third-party overloading, so there is no existing data to project the anticipated mix of new attachments and overloading. If KBCA members have overloaded on ICE's system in the past, it has been without ICE's knowledge.

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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: In response to KBCA Request No. 1-5, the Cooperative expressly states that “the Cooperative is not making any claims that it has unrecovered costs from the overloading attacher.”

Witness: David Phelps, VP Engineering and 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: The Cooperative has not recorded these expenses to an account which can be tabulated. Charges incurred would have been accounted for in general maintenance accounts. However, the Cooperative has not typically included the engineering survey fees as part of our make-ready charges. If the pole survey cost proposed in the tariff were decreased by 5% over the past 5 years and multiplied by the number of new attachments, the total time-frame cost would be \$9,915.61 as shown in Attachment "KBCA RFI 2-7" Excel file. This assumes (probably unrealistically) that every third-party attachment was properly submitted to the Cooperative for permitting as required in the existing CATV tariff. Costs associated with unauthorized attachments are not recovered by the Cooperative.

Witness: David Phelps, VP Engineering and Operations

