

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

JACKSON 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: Jackson Energy employs a full-time joint use coordinator. If there is any question about a pole, any attacher may contact the joint use coordinator to determine if a pole has been identified as being in need of replacement.

Witness: Ryan Henderson, Vice President of Engineering & Operations

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

JACKSON ENERGY COOPERATIVE CORPORATION'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: Jackson Energy ties orange flagging tape around a pole that is designated for replacement due to its condition.

Witness: Ryan Henderson, Vice President of Engineering & Operations

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

JACKSON ENERGY COOPERATIVE CORPORATION'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: The average amount of time spent at the pole location is ten minutes. We also estimate an additional ten minutes per pole of administrative review and routing permit requests back at the office. The average travel time to a pole and back to the office is one hour each way.

Witness: Ryan Henderson, Vice President of Engineering & Operations

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

JACKSON ENERGY COOPERATIVE CORPORATION'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: Jackson Energy will not charge an annual rental rate for facilities overlashed consistent with the regulation and the proposed tariff.

Witness: Ryan Henderson, Vice President of Engineering & Operations

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

JACKSON ENERGY COOPERATIVE CORPORATION'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: Wireline attachers have been awarded \$20,757,159 in federal subsidies for rural broadband deployment in counties served by Jackson Energy. We project this to translate to 11,405 new attachments over the next 6-year period. Historically, Jackson Energy has not allowed third party overloading, so there is no existing data to project the anticipated mix of new attachments and overloading.

Witness: Ryan Henderson, Vice President of Engineering & Operations

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

JACKSON ENERGY COOPERATIVE CORPORATION'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 attachment. See Response to KBCA RFI 1-5.

RESPONSE: Jackson Energy does not track the identified costs. However, the additional stress and surface area that the overloaded attachments create obviously contributes to additional risk of pole damage, code violation, and other issues, to which Jackson Energy must dedicate its limited resources in the event of such problems.

Witness: Ryan Henderson, Vice President of Engineering & Operations

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

JACKSON ENERGY COOPERATIVE CORPORATION'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: We do not have a separate account set up to track work related to pole attachments which falls outside the categories listed in the question. For example, when a truck catches a low TV cable and breaks a pole, we replace the pole, but the cost for this work isn't classified in an account related to pole attachments. Similarly, we hired our joint use coordinator in the fall of 2021, and expenses related to compensation for that new position are not presently covered by the identified charges.

Witness: Ryan Henderson, Vice President of Engineering & Operations

