

**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>	)	

**JACKSON PURCHASE ENERGY CORPORATION’S**  
**RESPONSE TO THE KENTUCKY BROADBAND AND CABLE ASSOCIATION’S**  
**SUPPLEMENTAL REQUESTS FOR INFORMATION**

Jackson Purchase Energy Corporation (“Jackson Purchase” 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

JACKSON PURCHASE ENERGY 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:** Pole inspection records are kept for each inspection cycle. A record of whether the pole was deemed defective or acceptable can be provided if the integrity of the pole is in question at the time of the request to attach. Please also see the Response to KBCA Request No. 2-2.

**Witness:      Travis Spiceland, Manager of 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:** "Red-tagged poles" will be visually flagged with red ribbon. A pole wrapped with red ribbon by Jackson Purchase Energy signifies the pole is flagged for replacement.

**Witness:      Travis Spiceland, Manager of 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:** The average amount of time spent per pole on a pre-construction survey is approximately 10 minutes. This does not include time for travel or application review or other administrative tasks, such as recordkeeping.

**Witness:     Travis Spiceland, Manager of Engineering**

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

**RESPONSE:** Jackson Purchase Energy will not charge an annual rental fee for overlashed facilities appropriately made under the proposed pole attachment tariff.

**Witness:     Travis Spiceland, Manager of Engineering**

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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:** The anticipation of increased overloading requests over the next 5-10 years is due to the push to deploy broadband in the state of Kentucky. Many electric utilities are currently experiencing this increased demand, while others will see heightened requests as additional federal and state funding is awarded.

**Witness:      Travis Spiceland, Manager of Engineering**

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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:** Stranded costs incurred by Jackson Purchase Energy due to overloading attachers include personnel time to review application, verify adequate pole strength, and conduct field inspections. The Cooperative has not historically maintained readily available records of such costs, and the proposed tariff clearly indicates that there will be no additional overload charge, consistent with the regulation, in any event.

**Witness:      Travis Spiceland, Manager of 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:** Over the past 5 years, there have been approximately 1,300 new attachments made on Jackson Purchase Energy's system. During the processing of applications for each of these attachments, the only non-recurring charges recovered were those for necessary make-ready. Costs associated with application review, field surveys, post construction inspections, and pole loading analyses were not recovered from the applicants. To the extent that third-parties made unauthorized attachments to Jackson Purchase Energy's poles, the Cooperative recovered nothing.

**Witness:      Travis Spiceland, Manager of Engineering**



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**VERIFICATION**

I, Travis Spiceland, 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.

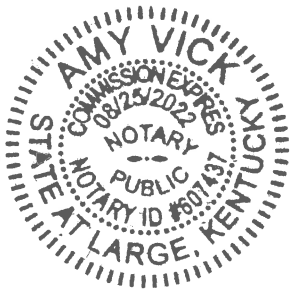


Travis Spiceland  
Manager of Engineering  
Jackson Purchase Energy Corporation

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

SUBSCRIBED AND SWORN TO before me on this the 24<sup>th</sup> day of May, 2022.

My commission expires: 8/25/22


  
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Notary Public