



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

KENERGY CORP.'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:** Kenergy would have to be contacted if the defective pole was not properly identified and marked. Kenergy and its pole inspection contractor have a highly efficient and effective pole inspection system such that an unmarked pole that needs replacing is a rare occurrence. Other poles that would be designated for replacement, via system improvement project or other work, would be discovered by the attacher via the pole attachment process.

**Witness:      Robert Stumph, Vice-President, 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:** See response to KBCA's initial RFI Request No. 1-8b.

**Witness:      Robert Stumph, Vice-President, Engineering and Operations**

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**REQUEST NO. 2-3:** Identify the average amount of time You spend per pole on a pre-construction survey.

**RESPONSE:** An average time of 15 minutes to survey each pole is listed in Appendix E of the tariff and responded to in KPSC First RFI Request No. 16.

**Witness:      Robert Stumph, Vice-President, Engineering and Operations**

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

**RESPONSE:** Correct. See response to KPSC First RFI Request No. 3.

**Witness:      Robert Stumph, Vice-President, 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:** The contention is based upon the approximately \$1 billion in broadband subsidies that have been appropriated as well as evidence of broadband attachments seen across the country.

**Witness:      Robert Stumph, Vice-President, Engineering and Operations**

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**REQUEST NO. 2-6:** Identify the specific costs, in dollars, incurred by You in connection with overlashing that You claim are not recovered from the overlashing attacher. See Response to KBCA RFI 1-5.

**RESPONSE:** Kenergy does not keep records related to these costs. Poles are designed to carry a certain amount of load. The pole will have an overload capacity factor that may/may not allow for additional loading, including overlashing. 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:      Robert Stumph, Vice-President, 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:** Kenergy does not keep records on employees' time spent specifically for this activity.

**Witness:      Robert Stumph, Vice-President, Engineering and Operations**



