

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

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

**MEADE COUNTY RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSE TO THE KENTUCKY BROADBAND AND CABLE ASSOCIATION'S
SUPPLEMENTAL REQUESTS FOR INFORMATION**

Meade County Rural Electric Cooperative Corporation (“Meade County” or the “Cooperative”), by counsel, files its Response to the KBCA’s Second 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

MEADE COUNTY RURAL ELECTRIC 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 pole that has previously been inspected, reviewed by engineering, and deemed as needing replacement will be, and has been, “red-flagged” with a red ribbon or similar flagging method. If there are questions about any other poles, that will be evaluated through the application process.

Witness: David R. Poe, P.E., VP Operations & 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: Yes. Please see the response to KBCA Request No. 2-1.

Witness: David R. Poe, P.E., VP Operations & 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: 15 minutes is being allocated to conduct field survey per pole. This does not include required travel or administrative review/recordkeeping time associated with other aspects of the application process.

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

RESPONSE: As noted in the Meade County's responses to the prior round of data requests, there is no intention at this time to charge for overlashing made consistent with the regulation and the proposed tariff; however, the additional loading of facilities and reliability of electrical service due to overlashing continues to be a concern.

Witness: David R. Poe, P.E., VP Operations & Engineering

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REQUEST NO. 2-5: Provide any data related to Your contention that “demand for overlashing/additional load on poles will be much greater over the next 5-10 years than ever before,” including any projections of any increase in overlashing for the area You serve. See Response to KBCA RFI 1-2.

RESPONSE: It is common knowledge that the demand for high-speed communications is high and is accelerating. There are more entities entering the business for potential profits, and the readily available supply of government grants and low-interest loans to fund such projects is making the business more attractive than ever. Overlashing is one of the methods many of these entities are doing or considering to reduce construction and fixed costs. Given the Commission's regulation allowing certain overlashing at no charge, it is reasonable to expect that entities will try to avail themselves of that. Within Meade County RECC's service area, a high-speed communications group has already contracted with an existing attacher for an installed overlashed fiber cable.

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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: This Cooperative has not tracked such data in a manner to provide a reasonable cost related to overloading; each occurrence is unique. There have been costs related to restoration and investigation of disturbance of electric power. There have also been costs related to clean-up of fielding issues due to the overloader's failure to exercise proper care on the Cooperative member's property.

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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: As explained in the response for 2-6, Meade County RECC does not track such data. There are issues other than third-party caused disturbances and outages, such as moving communication cables out of the way during storms and accidents and then waiting on the communications group to respond and reattach, but MCRECC has not historically tracked such data. This Cooperative also fields and investigates many calls from the public regarding low or downed CATV and telephone cables because the public finds we are easier to contact and more responsive than third-party attachers.

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REQUEST NO. 2-8: To Meade County R.E.C.C. and Taylor County R.E.C.C. only: You did not respond to KBCA's RFI 1-9, which states, "Explain the basis for Your proposed requirement that an attacher pay the entire cost of replacing a pole that is not red-tagged, including all economic basis for this requirement." If You have any basis, please provide it.

RESPONSE: Please see the response to KBCA Request No. 1-9, where Meade County answered this request. For additional clarity, the determination to continue using a pole or to "red-tag" a pole is a fact-specific determination that is not related to the age of the pole. If a Cooperative pole needs to be replaced based on inspection determinations to ensure the safety and reliability of the system, the Cooperative will incur that cost. Similarly, if a pole needs to be replaced due to the clearance requirements of a new attachment, this is a safety and reliability cost rightfully incurred by the attacher.

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REQUEST NO. 2-10: To Meade County R.E.C.C. only: You did not respond to KBCA's RFI 1-10(a), which states, "Explain how You decide what size and strength of pole You put in service." Please provide an answer now.

RESPONSE: Please see the response to KBCA Request No. 1-10, where this was answered. For additional clarity, the Cooperative sizes its poles based upon considerations of immediate need, as well as reasonably anticipated future needs. Meade County, as does most utilities, standardizes certain sizes of pole for general use (such as 40-4 poles for single-phase distribution). Sizing does vary, however, based upon anticipated loading needs and clearance code requirements, as dictated by terrain and the other site-specific applications.

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REQUEST NO. 2-11: To Meade County R.E.C.C. only: Explain how frequently Meade County R.E.C.C. inspects its poles, including the portion of its system it inspects each year.

RESPONSE: Meade County RECC adheres to and follows the Kentucky Public Service Commission's regulation regarding the 2-year inspection cycle of an electrical distribution system.

Witness: David R. Poe, P.E., VP Operations & Engineering

