

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

In the Matter of:

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF RURAL ELECTRIC COOPERATIVE CORPORATIONS))))	CASE NO. 2022-00106
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**LICKING VALLEY RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSE TO THE KENTUCKY BROADBAND
AND CABLE ASSOCIATION'S SUPPLEMENTAL REQUESTS FOR INFORMATION**

Licking Valley Rural Electric Cooperative Corporation (“Licking Valley” or the “Cooperative”), by counsel, files its responses 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

LICKING VALLEY 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: Please see the response to KBCA Request No. 2-2. To the extent an attacher has questions about untagged poles, that will be evaluated during the application process.

Witness: **Kerry Howard, General Manager/CEO**
 Chris Murphy, Superintendent

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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: Licking Valley will visibly mark "red tagged poles" with orange ribbon. The orange ribbons will signify poles designated for replacement.

Witness: **Kerry Howard, General Manager/CEO**
 Chris Murphy, Superintendent

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
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REQUEST NO. 2-3: Identify the average amount of time You spend per pole on a pre-construction survey.

RESPONSE: Licking Valley estimates that it will spend up to 1 hour on pre-construction survey work. This time is exclusive of travel and other administrative tasks performed in addition to the pre-construction survey.

**Witness: Kerry Howard, General Manager/CEO
Chris Murphy, Superintendent**

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
RURAL ELECTRIC COOPERATIVE CORPORATIONS
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LICKING VALLEY RURAL ELECTRIC COOPERATIVE CORPORATION'S
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REQUEST NO. 2-4: Confirm You will not charge an annual rental rate for overlashed facilities.

RESPONSE: Consistent with the regulation and the proposed tariff, Licking Valley will not charge an annual rental fee for overlashed facilities.

**Witness: Kerry Howard, General Manager/CEO
Chris Murphy, Superintendent**

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
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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: Communication company(s) have recently contacted Licking Valley and proposed overloading. Based on these communications, Licking Valley is projecting more overloading in the future. Coupled with the significant broadband deployment subsidies that have recently been made available to attachers, it is reasonable to expect increased overloading on our poles.

**Witness: Kerry Howard, General Manager/CEO
Chris Murphy, Superintendent**

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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 attacher. See Response to KBCA RFI 1-5.

RESPONSE: Licking Valley does not have any readily available cost records associated with overloading, although as a general matter they would related primarily to expenses associated with fixing broken poles. Broken poles as a direct result of the third-party attachments, and they are time-consuming and costly to the Cooperative. Those broken poles could result from, among other things, a tree that breaks two poles only because the weight of the tree could not break the additional third-party cables; a low clearance situation where a third-party cable is hit by a vehicle; or an improperly installed third-party anchor that adds stress to a pole, causing it to break or need replacement.

**Witness: Kerry Howard, General Manager/CEO
Chris Murphy, Superintendent**

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LICKING VALLEY RURAL ELECTRIC COOPERATIVE CORPORATION'S
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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: Cooperative cannot accurately provide the attacher's avoided costs for the past five years because the Cooperative was not set up to track these costs separately, and the small amount of attachments/work orders submitted did not justify setting up a separate system. The only non-recurring costs passed along to the attacher were for necessary make-ready to allow for their proposed attachments.


**Witness: Kerry Howard, General Manager/CEO
Chris Murphy, Superintendent**

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

LICKING VALLEY RURAL ELECTRIC COOPERATIVE CORPORATION'S
 RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

VERIFICATION

I, Kerry Howard, 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.




 Kerry Howard
 General Manager/CEO
 Licking Valley Rural Electric Cooperative
 Corporation

COMMONWEALTH OF KENTUCKY)
) ss:
 COUNTY OF Morgan)

SUBSCRIBED AND SWORN TO before me on this the 2nd day of June, 2022.

My commission expires: 06-21-2025

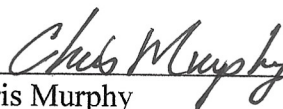

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 Notary Public

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
RURAL LOCAL EXCHANGE CARRIERS
CASE NO. 2022-00106

LICKING VALLEY RURAL ELECTRIC COOPERATIVE CORPORATION'S
RESPONSES TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

VERIFICATION

I, Chris Murphy, 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.



Chris Murphy
Superintendent
Licking Valley Rural Electric Cooperative
Corporation

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

SUBSCRIBED AND SWORN TO before me on this the 2nd day of June, 2022.

My commission expires: 06-21-2025

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