

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)	

**NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION’S
RESPONSE TO THE KENTUCKY BROADBAND
AND CABLE ASSOCIATION’S SUPPLEMENTAL REQUESTS FOR INFORMATION**

Nolin Rural Electric Cooperative Corporation (“Nolin” 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

NOLIN 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: Though poles designated for further review and/or replacement are physically red tagged, an attacher could also request information from Nolin regarding the status of specific pole numbers they intend to attach to prior to submitting an attachment permit request.

Witness: Devon C. Woosley

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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: As part of our required ground inspection process, we are currently marking poles in need of further review and potential replacement with red marking tape.

Witness: **Devon C. Woosley**

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

RESPONSE: We have estimated that we could review approximately nine contiguous poles per man-hour in a pre-construction survey. This does not include travel time or review of the application.

Witness: **Devon C. Woosley**

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

RESPONSE: We do not intend to charge an annual rental rate for overlashed facilities at this time.

Witness: **Devon C. Woosley**

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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: As stated in response to KBCA Request No. 1-2, approximately \$1 billion in broadband subsidies have been appropriated for rural areas in Kentucky. Given that this amount of infrastructure investment is unprecedented, it is our expectation that we will see an unprecedented pace of telecommunications deployment across our system.

Witness: Devon C. Woosley

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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: See the response to KBCA 2-5, above. Nolin 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 or 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. Costs from resultant damages and repairs are not recovered.

Witness: **Devon C. Woosley**

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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: See Nolin's responses to KBCA Request Nos. 1-13 and 2-6.

Witness: **Devon C. Woosley**

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VERIFICATION

I, Devon C. Woosley, 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.

Devon C. Woosley

Devon C. Woosley
Manager - Engineering
Nolin Rural Electric Cooperative Corporation

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF Hardin)

SUBSCRIBED AND SWORN TO before me on this the 1st day of June, 2022.

My commission expires: 8/29/2024

Allison F. Coffey #KYNP11557
Notary Public

