



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

OWEN ELECTRIC COOPERATIVE, INC.'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:** There is no visible way for an attacher to determine ahead of time if a pole will be replaced for deterioration other than if it has been red tagged. A pole is not slated for changeout due to deterioration unless it has been identified during the pole inspection as previously described. If an attachment request is made for a pole that is slated to be changed out for other reasons and requires make ready for the new attachment, the attacher will be notified of the upcoming changeout during the permitting process.

**Witness: Jennifer Taylor, P.E., VP 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:** See response the response to KBCA Request No. 1-8.

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

**RESPONSE:** It is difficult to deduce the amount of time spent per pole for a pre-construction survey. Drive time, topography, and complexity of pole arrangement will all impact the survey time. There is also an increase in efficiency for multi-pole requests along the same pole line, versus a request for a single attachment on the outskirts of the system. Basing the response on a 40-pole attachment request example, the average amount of pre-construction survey time per pole would be approximately 30 minutes per pole.

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

**RESPONSE:** See response to KBCA Request No. 1-5.

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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:** We have typically not been notified of overloading activity on our system, so it is difficult for us to give a scale of increase of overloading on the system. To this point, most of the overloading was done without our knowledge or opportunity to review. The very fact that there is now such a large amount of available broadband subsidies recently made available would logically lend itself to the belief that there will be an increase in overloading instances on our system. I would defer to the individual broadband providers to best be able to project the anticipated increase in overloading in a particular geographic area. Owen is thankful to have the regulatory provision to now be given notice of such occurrences.

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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:** Rental fees go towards annual Operations and Maintenance of the system. Included in the O&M expense are on-going pole inspection and treatment, on-going Right of Way maintenance, biennial system-wide line inspection, storm restoration of poles, and administrative costs. Since overloading does not generate additional revenue to be applied to these expenses, the general membership and existing attachers are subsidizing those expenses while the overloading company reaps the benefits of a well-maintained system. Again, since we have not been made aware of overloading activity on our system in the past, it would not be possible to quantify the net value of that subsidization.

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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:** Prior to the regulation allowing for survey costs, all engineering time associated with pole attachment surveys were being subsidized by the Owen membership. Between 2017-2021, Owen has spent \$32,194 in outside consulting fees associated with pole attachment management. Internally, Owen has spent an estimated 2,800 hours over the last five years for engineering survey and processing of over 430 attachment requests. That would equate to an expense estimated in excess of \$190,000. None of these expenses were recovered through non-recurring charges since survey fees have not been charged by Owen prior to this regulation. Additionally, please also see the response to KBCA Request No. 2-6.

**Witness:      Jennifer Taylor, P.E., VP of Engineering**



