

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

**In the Matter of:**

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

**SALT RIVER ELECTRIC COOPERATIVE CORPORATION'S RESPONSE TO THE  
KENTUCKY BROADBAND AND CABLE ASSOCIATION'S SUPPLEMENTAL  
REQUESTS FOR INFORMATION**

Salt River Electric Cooperative Corporation (“Salt River” 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

SALT RIVER 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:** If a defective pole is not visibly marked with a colored tag, the new attacher should contact Salt River Engineering Department so that our records can be reviewed to determine if the pole has been red-tagged. Any pole, regardless of being red-tagged, which the new attacher believes may be defective should be submitted to Salt River. Salt River engineering will conduct a field audit of the pole to determine if the pole should be replaced at Salt River’s expense.

**Witness: Chase Mills, Chief Operations Officer**

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

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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, Salt River visibly marks red tagged poles with ribbon flagging tape. Primarily orange flagging tape is used.

**Witness: Chase Mills, Chief Operations Officer**

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

**RESPONSE:** The average amount of time spent per-pole for a pre-construction survey is estimated to be 6 minutes. The total amount of time required to complete a pre-construction survey can, however, vary greatly depending on the complexity of the attachment. The stated 6 minutes does not include travel time, application review time, or other administrative/recordkeeping time.

**Witness: Chase Mills, Chief Operations Officer**

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

**RESPONSE:** Salt River will not charge an annual rental rated for overlashed facilities if these facilities do not require additional attachments to Salt River poles and are made consistent with applicable law and the proposed tariff.

**Witness: Chase Mills, Chief Operations Officer**

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RURAL ELECTRIC COOPERATIVE CORPORATIONS  
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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:** Salt River's current attachment agreements prohibit attacher overlashing. Consequently, any increase of overlashing at Salt River would be significant.

**Witness: Chase Mills, Chief Operations Officer**

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RURAL ELECTRIC COOPERATIVE CORPORATIONS  
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SALT RIVER ELECTRIC COOPERATIVE CORPORATION'S  
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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:** When a pole loading analysis is completed and any necessary upgrades are completed prior to installation of overloading by qualified personnel using proper installation techniques and equipment, Salt River does not foresee any additional costs that are likely to be incurred by Salt River or its members due to the overloading of facilities.

**Witness: Chase Mills, Chief Operations Officer**

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF  
RURAL ELECTRIC COOPERATIVE CORPORATIONS  
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SALT RIVER 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:** The costs incurred by Salt River as a result of third-party communication attachments that are not covered by rental payments over the past five years cannot be readily determined. Any costs not directly reimbursed are included as a part of the normal operations of the Cooperative and are expensed accordingly.

**Witness:**       **Mechonda O'Brien, Financial Optimization Manager**  
                      **Chase Mills, Chief Operations Officer**



ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF  
RURAL LOCAL EXCHANGE CARRIERS  
CASE NO. 2022-00107

SALT RIVER ELECTRIC COOPERATIVE CORPORATION'S  
RESPONSES TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

VERIFICATION

I, Mechonda O'Brien, 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.

*Mechonda O'Brien*

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Mechonda O'Brien  
Financial Optimization Manager  
Salt River Electric Cooperative Corporation

COMMONWEALTH OF KENTUCKY     )  
  ) ss:  
COUNTY OF NELSON                         )

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

My commission expires: July 5, 2023

*Diana R. Edwards*  
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Notary Public

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF  
 RURAL LOCAL EXCHANGE CARRIERS  
 CASE NO. 2022-00107

SALT RIVER ELECTRIC COOPERATIVE CORPORATION'S  
 RESPONSES TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

**VERIFICATION**

I, Chase Mills, 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.

*Chase Mills*

Chase Mills  
 Chief Operations Officer  
 Salt River Electric Cooperative Corporation

COMMONWEALTH OF KENTUCKY    )  
   ) ss:  
 COUNTY OF NELSON                    )

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

My commission expires: July 5, 2023

*Quiana R. Edwards*  
 Notary Public