

**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)	

**SHELBY ENERGY COOPERATIVE, INC.'S RESPONSE TO THE
KENTUCKY BROADBAND AND CABLE ASSOCIATION'S SUPPLEMENTAL
REQUESTS FOR INFORMATION**

Shelby Energy Cooperative, Inc. ("Shelby Energy" 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

SHELBY ENERGY 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: No poles would be designated for replacement unless otherwise tagged.

Witness: Jack Bragg, Jr., President and CEO

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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, “red-tagged poles” will be marked with a red tag. No other colors will be used. Red would indicate Shelby Energy’s intention to replace that pole within 12 months. An extreme danger pole would be changed as soon as possible.

Witness: Jack Bragg, Jr., President and CEO

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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 spend approximately 30 minutes on average for pre-construction survey work, exclusive of other travel and administrative work.

Witness: Jack Bragg, Jr., President and CEO

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

RESPONSE: Assuming the facilities are lawfully overlashed, confirmed.

Witness: Jack Bragg, Jr., President and CEO

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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: Wireline attachers have been awarded \$13,654,535 in federal subsidies for rural broadband deployment in counties served by Shelby. We project this to translate to 7,535 new attachments over the next 6-year period. Historically, Shelby has allowed third party overloading but has strongly encouraged third parties to attach to poles rather than overloading.

Witness: Jack Bragg, Jr., President and CEO

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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: As long as the attacher follows the requirements in the proposed tariff to supply or cover the cost of initial engineering analysis to ensure the overlashing does not compromise the safety and reliability of the pole, the Cooperative is not making any claims that it has unrecovered costs from the overlashing attacher.

Witness: Jack Bragg, Jr., President and CEO

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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: No specific data available is readily available. However, Shelby is exposed to an increased risk of pole failure as a result of third-party attachments. Broken poles as a direct result of the third-party attachments 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 adds stress to a pole, causing it to break or need replacement.

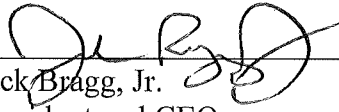
Witness: Jack Bragg, Jr., President and CEO

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VERIFICATION

I, Jack Bragg, Jr., 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.




Jack Bragg, Jr.
President and CEO
Shelby Energy Cooperative, Inc.

COMMONWEALTH OF KENTUCKY)
) ss:
COUNTY OF)

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

My commission expires: 12/12/2025



Notary Public

KY NP 38593

