



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

SOUTH KENTUCKY 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:** All poles designated for replacement are marked with red ribbon, and a work order exists for that work in our work order system.

**Witness: Kevin Newton, Chief Operating Officer**

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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 to KBCA Request 2-1.

**Witness: Kevin Newton, Chief Operating Officer**

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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 estimated that we can evaluate 10 poles per hour for both pre- and post-construction surveys. This estimate was used in the survey fee calculation. This estimate does not include time required for travel and administrative work.

**Witness: Kevin Newton, Chief Operating Officer**

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

**RESPONSE:** Confirmed for facilities that are overlashed consistent with applicable law and the proposed tariff.

**Witness: Kevin Newton, Chief Operating Officer**

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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:** We believe the funding for fiber and broadband will undoubtedly lead to more overlashing. Wireline attachers have been awarded \$13,777,020 in federal subsidies for rural broadband deployment in counties served by South Kentucky. We project this to translate to 7,570 new attachments over the next 6-year period. Historically, South Kentucky has not allowed third party overlashing, so there is no existing data to project the anticipated mix of new attachments and overlashing.

**Witness: Kevin Newton, Chief Operating Officer**

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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:** As stated previously, if the overloading is included in a pole loading analysis, if it does not result in a loading issue, and if the work is within the NESC clearances, it would not result in any additional costs that the Cooperative is presently seeking to recover.

**Witness: Kevin Newton, Chief Operating Officer**

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RESPONSE TO THE KBCA'S SUPPLEMENTAL REQUESTS FOR INFORMATION

**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:** We do not have any documented expenses, but it should be noted that it is not unusual for us to have broken poles at the point of communications attachments during storms. We believe this most frequently occurs as a result of poor guying by the attacher.

**Witness: Kevin Newton, Chief Operating Officer**

