

KENTUCKY PUBLIC SERVICE COMMISSION

In the Matter of:)	
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)	
ELECTRONIC INVESTIGATION OF THE)	CASE NO. 2022-00106
PROPOSED POLE ATTACHMENT)	
TARIFFS OF RURAL ELECTRIC)	
COOPERATIVE CORPORATIONS)	
)	
)	

The Kentucky Broadband and Cable Association and its members¹ (“KBCA”), pursuant to the Commission’s March 30, 2022, Order, respectfully submits these Supplemental Requests For Information (“RFIs”) to Big Rivers Electric Corporation (“Big Rivers”), Blue Grass Energy Cooperative Corporation (“Blue Grass”), Clark Energy Cooperative, Inc. (“Clark Energy”), Cumberland Valley Electric, Inc. (“Cumberland”), Farmers R.E.C.C. (“Farmers”), Fleming-Mason Energy Cooperative, Inc. (“Fleming-Mason”), Grayson R.E.C.C. (“Grayson”), Inter-County Energy Cooperative Corporation (“Inter-County”), Jackson Energy Cooperative Corporation (“Jackson Energy”), Jackson Purchase Energy Corporation (“Jackson Purchase”), Kenergy Corporation (“Kenergy”), Meade County, R.E.C.C. (“Meade”), Nolin R.E.C.C. (“Nolin”), Owen Electric Cooperative, Inc. (“Owen”), Salt River Electric Cooperative Corp. (“Salt River”), Shelby Energy Cooperative, Inc. (“Shelby”), South Kentucky R.E.C.C. (“South Kentucky”), and Taylor County R.E.C.C. (“Taylor”) in accordance with the following Definitions and Instructions.

¹ The KBCA’s members are Access Cable, Armstrong, C&W Cable, Charter Communications, Comcast, Inter Mountain Cable, Lycom Communications, Mediacom, Suddenlink, and TVS Cable. Kentucky Broadband & Cable Association, Our Members, *available at* <https://www.kybroadband.org/members>.

DEFINITIONS

1. The terms “You,” “Your,” and “the Company” refer individually to each of the R.E.C.C.s named above.
2. The term “KBCA” refers to the Kentucky Broadband and Cable Association.
3. The term “Commission” refers to the Kentucky Public Service Commission.
4. The term “Poles” refers to utility poles in Your electric distribution network in Kentucky that You own or control.
5. The term “Proposed Tariff” refers to the tariffs issued by each R.E.C.C. on February 28, 2022, in connection with this proceeding.
6. The term “Response” means the response of each R.E.C.C. to KBCA’s Initial Requests For Information, filed individually with the Commission on May 5, 2022.
7. All capitalized terms not defined herein shall have the meanings given to them under the Proposed Tariff.

INSTRUCTIONS

1. Each R.E.C.C. must respond individually to these Supplemental Requests for Information, and provide the requested data. If a response is identical for one or more R.E.C.C.s, specify the R.E.C.C.s to which the response applies.
2. In answering these Supplemental Requests for Information, please furnish all information that is known or available to You, regardless of whether the information is possessed directly by You or Your agents, employees, representatives, or investigators, or by Your attorneys or their agents, employees, representatives, or investigators.

3. Please identify at the end of Your response to each Supplemental Request for Information the person or persons most knowledgeable about such response and the person or persons responsible for the preparation of such response.

4. If any information responsive to these Supplemental Requests for Information is withheld, identify the Requests as to which such information is withheld and the reason(s) for withholding it.

5. For any information that You claim is unavailable, state why it is unavailable. If You cannot respond to the Supplemental Request for Information precisely as it is stated, provide any information that is available and is responsive to the Request at a level of detail different from that specified herein.

6. KBCA requests that You produce all documents referenced in any response or that You referenced, reviewed, or relied upon to respond to any Supplemental Request for Information.

SUPPLEMENTAL REQUESTS FOR INFORMATION

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.

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.

2-3. Identify the average amount of time You spend per pole on a pre-construction survey.

2-4. Confirm You will not charge an annual rental rate for overlashed facilities.

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.

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.

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.

2-8. ***To Meade County R.E.C.C. and Taylor County R.E.C.C. only:*** You did not respond to KBCA’s RFI 1-9, which states, “Explain the basis for Your proposed requirement that an attacher pay the entire cost of replacing a pole that is not red-tagged, including all economic basis for this requirement.” If You have any basis, please provide it.

2-9. ***To Taylor County R.E.C.C. only:*** You did not respond to KBCA’s RFI 1-10, which states, “Explain whether You would require an attacher to replace a pole where there would be space for it to attach but for Your reservation of space for Your sole use.” Please provide an answer now.

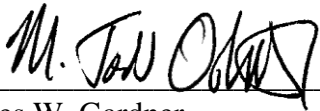
2-10. ***To Meade County R.E.C.C. only:*** You did not respond to KBCA’s RFI 1-10(a), which states, “Explain how You decide what size and strength of pole You put in service.” Please provide an answer now.

2-11. *To Meade County R.E.C.C. only:* Explain how frequently Meade County R.E.C.C. inspects its poles, including the portion of its system it inspects each year.

2-12. *To Fleming Mason Energy Cooperative, Inc. only:* Your response to KBCA's RFI 1-13(a) references an Exhibit 13(a). No such exhibit was filed with the Commission. Please provide it.

Dated: May 19, 2022

Respectfully submitted,

/s/ 

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