



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

RURAL LOCAL EXCHANGES CARRIERS' RESPONSES TO THE COMMISSION  
STAFF'S FIRST REQUESTS FOR INFORMATION

**REQUEST NO. 1:** Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18-15, 3. Payments, b. Payment of Make Ready Estimates. Explain what "<subsection (2)(b)(4) of this section>" refers to.

**RESPONSE:** The reference "<subsection 2(b)(4) of this section>" is a clerical error; the correct reference is to section 18.16(2)(d) of Duo County's proposed tariff. The RLECs jointly propose amending this section to specifically refer to "section 18.16(2)(d)" to avoid any confusion, and Ballard will adopt Duo County's proposed tariff with such revision.

Witness)      **Randy Grogan**

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**REQUEST NO. 2:** Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18-18 indicating that "[t]he make-ready cost, if any, for a pole that is not a red tagged pole to be replaced with a new Pole to accommodate the new Attacher's attachment shall be charged the Company's cost in accordance with the Company's tariff or a special contract regarding pole attachments between the Company and the new Attacher."

- a. Identify where the treatment of such make-ready costs is addressed in the tariff.
- b. Explain in detail who is responsible for such make-ready costs pursuant to the terms and conditions of the tariff.

**RESPONSE: (a)-(b) As a result of Ballard decommissioning its poles and scheduling all remaining poles in service for removal, Ballard does not anticipate performing surveys or make-ready work. In the event an attacher would like to make attachment to a Ballard pole still in service, Ballard would execute the documentation necessary to transfer ownership of the pole to the requesting attacher at no cost to the attacher.**

Witness) **Randy Grogan**

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**REQUEST NO. 3:** Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page  
18- 28.

- a. Provide support for the per pole survey fee for your system.
- b. Explain whether the per pole survey fee is intended to be an estimate of the survey costs that will be trued up in a final bill.
- c. Identify the tariff language that indicates when the per pole survey fee must be paid.

**RESPONSE:** (a) **Ballard did not propose a per pole survey fee for it system because all poles have been decommissioned, and the majority of poles have been removed. The remaining poles in Ballard's system primarily serve minimal or single addresses that are located mostly on or very close to privately owned property. Ballard is in the process of removing these poles as time and resources allow.**

(b) **See subpart (a), above. Please also see Ballard's Response to Commission Staff's Request No. 2.**

(c) **See subpart (a), above. Please also see Ballard's Response to Commission Staff's Request No. 2.**

Witness) **Randy Grogan**

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**REQUEST NO. 4:** Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18-28. Also refer to South Central Telephone's current tariff, PSC KY Tariff No. 4, Section 17, Original Sheet No. 16, 17.17 Rental Rate. Explain why the \$2.43 per linear foot of cable duct charge currently in South Central Telephone's tariff is not included in Duo County's proposed tariff.

**RESPONSE:** Ballard does not have knowledge or information sufficient to form a response to Request No. 4 as it appears to be directed exclusively to South Central Telephone. Ballard does not have cable duct for use.

Witness)      **Randy Grogan**

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**REQUEST NO. 5:** Refer to Duo County's proposed tariff, PSC KY No. 2A, Original Page 18-28. Explain why the rates for West Kentucky Rural Telephone Cooperative Corporation, Inc. will only be developed upon request.

**RESPONSE:** Ballard does not have knowledge or information sufficient to form a response to Request No. 5 as it appears to be directed exclusively to West Kentucky Rural Telephone Cooperative Corporation, Inc.

Witness)      **Randy Grogan**

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**REQUEST NO. 6:**

- a. Identify each account and subaccount in which the costs of utility poles in service are recorded.
- b. Provide a narrative description of the costs that are recorded in each such account, including a description of the type and vintage of poles for which costs are recorded in the account and a description other plant, if any, for which costs are recorded in the account.
- c. Provide a spreadsheet showing the plant in service balance of each such account at the end of each of the last three fiscal years.

**RESPONSE:** (a) All of Ballard's poles have been decommissioned and are no longer used by Ballard to provide service. As a consequence, Ballard does not maintain an account or subaccount for utility poles.

(b) See subpart (a), above.

(c) See subpart (a), above.

Witness) Randy Grogan

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**REQUEST NO. 7:**

- a. Identify each account and subaccount in which accumulated depreciation for poles in service is recorded.
- b. Provide a narrative description of how the accumulated depreciation in each such account is calculated.
- c. Identify the corresponding plant account or accounts for each account in which accumulated depreciation for poles is recorded.
- d. Provide a spreadsheet showing the balance of each such account at the end of each of the last three fiscal years.

**RESPONSE: (a) All of Ballard's poles have been decommissioned and are no longer used by Ballard to provide service. As a consequence, Ballard does not maintain an account or subaccount for utility poles.**

**(b) See subpart (a), above.**

**(c) See subpart (a), above.**

**(d) See subpart (a), above.**

**Witness) Randy Grogan**



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**REQUEST NO. 8:**

a. Identify the depreciation rates currently used to calculate depreciation expense for each account containing utility pole costs.

b. Identify the case in which each such depreciation rate was set.

c. Identify the useful lives of the poles used to calculate each such depreciation rate.

**RESPONSE: (a) All of Ballard's poles have been decommissioned and are no longer used by Ballard to provide service. As a consequence, Ballard does not maintain an account or subaccount for utility poles.**

**(b) See subpart (a), above.**

**(c) See subpart (a), above.**

**Witness) Randy Grogan**

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**REQUEST NO. 9:** Identify the total number of distribution poles in your system, and provide a breakdown of those poles based on the year they were installed.

**RESPONSE:** Ballard does not have “distribution poles” or “transmission poles,” which are terms specific to the electric industry. The total number of remaining poles that have not yet been removed by Ballard is approximately 450.

As indicated in the proposed tariff, Ballard has decommissioned all of its poles and is in the process of removing all poles that have not yet been removed.

Witness)      **Randy Grogan**

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**REQUEST NO. 10:** Identify the total number of transmission poles in your system, and provide a breakdown of those poles based on the year they were installed.

**RESPONSE:** Please see Ballard's Response to Commission Staff's Request for Information No. 9.

Witness) Randy Grogan

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**REQUEST NO. 11:** Describe in detail the current plan or policy regarding the inspection and replacement of aging or damaged poles in your system, and provide a copy of any such plan or policy that has been memorialized in writing.

**RESPONSE:** A copy of Ballard's written plan for maintenance of its plant and equipment is provided herewith.

Witness)      **Randy Grogan**

# **BALLARD RURAL TELEPHONE COOPERATIVE**

## **Outside Plant and Central Office Maintenance Policy**

### **A. Outside Plant**

Fiber Optic buried plant(all exchanges) shall be inspected on a 1 year basis. Inspections are to be recorded on the company PLANT INSPECTION REPORT form, with all items duly noted(see form for details). All issues are to be repaired in a timely manner unless there is a danger to the public or an employee, if that is the case then the inspector is to report the issue to the Plant Manager and is to be corrected immediately. All buried plant is to be inspected for the following but not limited to, missing covers or damage to any pedestals, hand holes, fiber warning signs, plant identification numbers, cable washouts,etc... Any minor repairs shall be performed at that time, other extensive repairs will be performed by the clearance crew at a later date.

Old copper plant(buried and aerial) is decommissioned and is being removed as time allows, unless a danger exists and therefore to be removed immediately.

All BTC employees are encouraged, during daily operations, to observe and report and correct minor maintenance issues and report extensive issues to BTC management for remediations.

### **B. Central Office**

All Central Office structures shall be inspected and receive scheduled preventative maintenance on a biennial basis, to include but not limited to lighting, plumbing, electrical, heating and cooling, first aid supplies,etc...Fire extinguishers, backup battery strings and facility generators shall be inspected annually(or as needed) by contracted specialists. Central Office staff are to correct minor maintenance issues as they occur or are observed, and are to report more extensive maintenance issues to the Plant Manager. An inspection report copy is to be kept by management personnel. All Central Offices are to be kept in clean housekeeping manner.

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**REQUEST NO. 12:**

a. Explain how filing a tariff that simply incorporates another utility's tariff by reference complies with 807 KAR 5:015, Section 3; KRS 278.160; and KRS 278.180.

b. If Duo County amended its tariff, would that constitute an amendment of the tariffs of every utility that incorporated it by reference, or would each utility have to file a subsequent amendment?

**RESPONSE:** (a) Pursuant to longstanding Commission practice, Ballard has adopted the Duo County Tariff since at least 1999, and such adoption has been consistently approved by the Commission. This longstanding practice is also consistent with practice at the federal level, where Ballard (along with the other RLECs have adopted the Duo Tariff) has adopted the NECA, JSI, and/or Moss Adams Tariffs.

(b) Consistent with historical practice of Ballard's adoption of the Duo County Access tariff, it is anticipated that amendments applicable to all RLECs would constitute an amendment of the tariffs of every utility that incorporated it by reference, and any utility-specific rate sheets or information, including exceptions to such information, would be reflected in the amended filing for the specific utility.

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**REQUEST NO. 13:** For Ballard Rural Telephone Cooperative Corporation, Inc. only:  
Describe the timetable for decommissioning and removing your current poles.

**RESPONSE:** Ballard's poles have been decommissioned, but they have not yet been fully removed. The remaining poles to be removed were largely placed by Ballard to serve minimal or single addresses. Ballard will continue to remove its remaining poles as time and resources permit.

Witness)      **Randy Grogan**

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