

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

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

West Kentucky Rural Telephone Cooperative Corporation, Inc. (“WK&T” or the “Company”) by counsel, files its responses to the Commission Staff’s First Requests for Information, issued in the above-captioned case on April 21, 2022.

FILED: May 5, 2022

ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
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RURAL LOCAL EXCHANGES CARRIERS' RESPONSES TO THE COMMISSION
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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 WK&T will adopt Duo County's proposed tariff with such revision.

Witness) Trevor Bonnstetter

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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) **The treatment of make-ready costs is addressed throughout Sections 18.16, 18.17, and 18.18 of the tariff. Consistent with the procedures required by 807 KAR 5:015, WK&T will provide invoices for estimated survey costs and estimated make-ready costs. Subsequently, as is required by 807 KAR 5:015 § 4(6), if the final costs are different than the estimated costs, WK&T will send a Final Invoice that includes a true-up to "the actual survey costs incurred" and the "actual make ready costs." 807 KAR 5:015 § 4(6)(a)(1)-(2). Consistent with 807 KAR 5:015 § 4(6) and the Commission's Statement of Consideration implementing 807 KAR 5:015, the tariff specifically provides that a new Attacher "shall be charged the Company's cost."**

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(b) Consistent with 807 KAR 5:015 § 4(6), the Commission's Statement of Consideration implementing 807 KAR 5:015, the language of the tariff, and the Commission's historical precedent, an Attacher is responsible for the make-ready costs as it is the entity causing the cost. The Attacher will be "charged the Company's cost."

Witness) Trevor Bonnstetter

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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) **WK&T does not currently propose a per pole survey fee for its system because all of its attachers are subject to a joint use agreement. In the event an attacher without a joint use agreements makes application to attach to WK&T's poles, WK&T will provide a per pole survey fee estimate based upon the information included in the application.**

(b) **Yes. Pursuant to 807 KAR 5:015 § 4(2)(b)(6)(b), "If a utility's tariff requires prepayment of survey costs, the utility shall include a per pole estimate of costs in the utility's tariff and the payment of estimated costs shall satisfy any requirement that survey costs be prepaid." Pursuant to 807 KAR 5:015 § 4(6), a utility is required to send a "detailed, itemized final invoice of the actual survey charges incurred if the survey costs for an application differ from an estimate previously paid for the survey work."**

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(c) **Section 18.16(1)(a) of the tariff requires that the per pole Survey Charge be paid by the Attacher when submitting an Application requesting new attachments. (“All requests for Pole Attachments must be made in writing by the new Attacher and include payment of the per pole Survey Charge . . .”).**

Witness) Trevor Bonnstetter

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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: WK&T 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. WK&T does not have cable duct for use.

Witness) **Trevor Bonnstetter**

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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: All of WK&T's pole attachments are governed by joint use agreements, and WK&T has had no requests for pole attachments from any entity with which WK&T does not have a joint use agreement. In the event any entity without a preexisting joint use agreement desires to attach to WK&T's poles, WK&T will promptly provide the attacher with an estimated survey fee, estimated make-ready, and attachment rate based upon the number and location of poles upon which attachment is requested.

Witness) Trevor Bonnstetter

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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) – (c) WK&T has no remaining balance in any plant account associated with utility poles. Any remaining balances of plant account for poles were written off by WK&T in December 2015 at the conclusion of WK&T's fiber stimulus project.

Witness) Trevor Bonnstetter

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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: Please see **WK&T's Response to Commission Staff's Request for Information No. 6.**

Witness) Trevor Bonnstetter

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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: Please see WK&T's Response to Commission Staff's Request for Information No. 6.

Witness) Trevor Bonnstetter

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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: WK&T does not have “distribution poles” or “transmission poles,” which are terms specific to the electric industry. The total number of poles currently in service in WK&T’s system in Kentucky is 429. For a breakdown of the poles based on the year they were installed, please see the exhibit provided with this response.

Witness) **Trevor Bonnstetter**

West Kentucky Rural Telephone Cooperative
 Staff inquiries, question 9 and 10

1/1/1978	1	1/1/1998	1
1/1/1982	3	7/1/1998	2
11/23/1982	10	9/1/1998	1
12/1/1982	3	1/1/1999	1
12/2/1982	16	5/1/1999	7
12/6/1982	19	6/1/1999	6
12/8/1982	6	1/1/2000	8
1/5/1983	9	3/1/2000	17
1/10/1983	16	4/1/2000	16
1/11/1983	5	5/1/2000	32
1/24/1983	7	6/1/2000	28
1/25/1983	2	8/1/2000	1
1/26/1983	16	10/1/2000	2
1/27/1983	4	12/1/2000	1
2/1/1983	11	1/1/2001	3
3/1/1983	6	7/1/2001	3
3/2/1983	4	12/1/2003	7
3/3/1983	7	1/1/2004	1
3/4/1983	7	12/14/2008	4
3/14/1983	11	2/13/2009	1
3/23/1983	2	5/13/2009	1
1/1/1986	2	7/30/2009	7
1/1/1987	2	8/26/2009	1
1/1/1989	7	8/26/2009	3
1/1/1990	1	12/22/2009	1
1/1/1994	4	4/19/2010	1
1/1/1995	3	4/22/2010	1
3/1/1995	4		
11/1/1996	27		
1/1/1997	5		
2/1/1997	15		
3/1/1997	11		
4/1/1997	4		
5/1/1997	14		
6/1/1997	8		

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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 WK&T's Response to Commission Staff's Request for Information No. 10.

Witness) Trevor Bonnstetter

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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 WK&T's Pole Inspection Procedure is provided with this response.

Witness) **Trevor Bonnstetter**

WKRT POLE INSPECTION PROCEDURE

Need for Pole Inspection Procedure

Biological degradation is also varied and complex. No machine has been developed which will evaluate all these variables. A trained experienced pole inspector using proven tools and techniques, while not perfect, still provides the most accurate inspection.

The pole inspector will inspect only those poles owned by WKRT. The pole inspection process will identify whether the pole is in good condition or if it should be replaced. Poles that are found in the inspector's opinion to be unsound will be either cut off (if a pedestal is attached), removed with the drop buried to the subscriber's premises, or replaced if a buried drop is not feasible. Poles will **NOT** be restored or reinforced. Remediation of the pole will not be performed regardless of the situation. Poles will be replaced when necessary.

1. Visual Inspection

The first step is to evaluate the condition of the pole above ground line is used to find gross defects; these include but are not limited to:

- | | |
|-------------------------------------------------|-------------------------------|
| • Mechanical, lightning, and fire damage | Replace, cut or remove |
| • Woodpecker holes | Replace, cut or remove |
| • Cracked, broken, decayed, split or damaged | Replace, cut or remove |
| • Defective or missing hardware | Report anomaly to Engineering |
| • Drop going through trees or other impediments | Report anomaly to Engineering |
| • Guy(s) loose, broken, missing | Report anomaly to Engineering |

2. Sounding Inspection

The second step in the inspection process is to sound vigorously the above ground portion of the pole from 7' above ground level (or as high as the inspector can reach) to ground level with a minimum 20-ounce hammer. Listening and feeling for less obvious defects such as above ground voids likely caused by decay or insects, loose shell, overhead hardware that may have loosened. A crisp report from the hammer strike from head height to the ground level will show that the pole is sound. If this occurs, tag the pole at eye level with a WKRT inspection tag; record the pole number on the inspection form with date and initials.

If the sounding test shows that the pole is obviously in bad condition and must be removed, cut or replaced, tie an orange ribbon on the pole and nail a reject tag on it. Report this immediately to Engineering.

3. Boring (invasive core sampling)

The third step is necessary only if the inspector is undecided from sounding and visual inspection. This process is performed by using a 3/8" drill at three locations around the pole at a 45° angle to the axis of the pole. Extend beyond the center of the pole but do not break through the other side. The drill should be a long shank ship auger. When a void is discovered, the inspector will do the following:

- Quantify the size of the anomaly
- Determines cause of void *i.e. decay growth, insect damage...*
- Estimates reduction in poles strength
- Determines if the structure meets service thresholds

The inspector will recommend one of the following:

- Cut pole for stub pole where pedestal is located, recommend removal of the pole, and bury drop to subscriber.
- If the subscriber does not want or cannot get a buried drop, replace the pole.

- Where the pole does not have a pedestal, obtain approval if possible from the subscriber for a buried drop. If a buried drop is not feasible, replace the pole.

4. Excavation

Excavation may be required to identify and assess defects below ground line if the inspector cannot decide by the sounding process. Partial excavation will be used as described below:

Partial Excavation

1. Exposes a portion of the pole below ground line
2. Surface decay and minor insect infestation can be identified
3. Allows some examination of the area most prone to decay
4. Increases the probability to identify degraded poles

Restoring poles is outside the scope of this work. Bad poles will be removed, replaced, or cut to stub poles.

Any serious decay of the pole should result in **replacement, cut for stub pole, or remove the pole**. Place an orange ribbon and removal tag on the pole.

If the inspector decides that the pole is in good condition, each bore should be sealed with a 7/16 in. treated wooden plug. Replace soil and tamp to existing firmness.

5. Pole Age

The inspector should pay particular attention to all poles that are 20 year old or older. Refer to the WKRT pole inspection list for poles older than 20 years.

Inspection procedure UO S2325 is used as the basis for the WKRT pole inspection procedure.

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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, WK&T 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 WK&T (along with the other RLECs who have adopted the Duo Tariff) has adopted the NECA, JSI, and/or Moss Adams Tariffs.

(b) Consistent with historical practice of WK&T'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.

Witness) Trevor Bonnstetter

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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: **Commission Staff's Request No. 13 is not directed to WK&T
and no response is requested.**

Witness) Trevor Bonnstetter

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ELECTRONIC INVESTIGATION OF THE PROPOSED POLE ATTACHMENT TARIFFS OF
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VERIFICATION

I, Trevor Bonnstetter, 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.

Trevor Bonnstetter

Name: Trevor Bonnstetter

Title: CEO

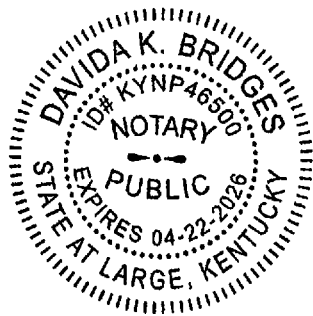
COMMONWEALTH OF KENTUCKY)

) ss:

COUNTY OF GRAVES)

SUBSCRIBED AND SWORN TO before me on this the 3 day of May, 2022.

My commission expires: 04-22-26



Davida K Bridges

Notary Public