

**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 SECOND REQUESTS FOR INFORMATION**

Thacker-Grigsby Telephone Company, Incorporated (“Thacker-Grigsby” or the “Company”) by counsel, files its responses to the Commission Staff’s Second 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 LOCAL EXCHANGE CARRIERS  
CASE NO. 2022-00107

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

**REQUEST NO. 1:** Describe your recent efforts, if any, to reduce the number of above ground lines, and identify the number of poles that have been eliminated in your system in each of the last ten years because the lines previously attached to those poles were placed underground.

**RESPONSE:** Thacker-Grigsby's efforts to reduce above ground lines primarily centers around new construction, and Thacker-Grigsby has largely been successful in burying new facilities. While Thacker-Grigsby is continuously looking for opportunities to move facilities underground, the terrain in Thacker-Grigsby's service territory is rocky and hilly, which has made it impractical to make a significant impact on relocating aerial cables to buried cable. However, Thacker-Grigsby has buried approximately 1,322 end user service drops.

Witness)      Kimberly Jones

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 SECOND REQUESTS FOR INFORMATION

**REQUEST NO. 2:** Other than identifying specific defective poles through inspections that require replacement, state whether you have a policy or practice of replacing poles on a periodic basis or as they reach the end of their useful lives and, if so, describe that policy or practice in detail, including how and when (e.g. how far in advance) such replacements are identified or included in your projected capital spending budget.

**RESPONSE:** Thacker-Grigsby does not have a specific policy that requires replacement of any poles on a periodic basis. Rather, as a matter of responsible spending, Thacker-Grigsby replaces poles when it is determined those poles are no longer safe for use. This determination could result from unexpected damage (such as a car collision or an adverse weather event) or through periodic inspections of the poles, such as those described in Response to Commission Staff's First Requests for Information No. 11.

Thacker-Grigsby does not specifically budget for periodic replacement of poles.

Witness)      Kimberly Jones

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 SECOND REQUESTS FOR INFORMATION

**REQUEST NO. 3:** Describe in detail the process you use to budget for future capital expenditures, including when you first develop a preliminary capital spending budget for a particular year (e.g. three years in advance, five years in advance, etc.), how you determine the amounts to include in the preliminary capital budget, the level of specificity included in any preliminary budget, and each step that is taken in the process to get from any preliminary budget to a final capital spending budget for a particular year.

**RESPONSE:** Thacker-Grigsby develops its capital budget in coordination with its operational goals. Each department forecasts its two-year capital requirements for projects under its purview with an eye towards achievement of the Company's operational goals. The Company develops a budget for the submitted projects based on its importance in meeting those operational objectives, and based upon the availability of funding to complete the project. Any budgetary issues raised by unforeseen capital expenditures, for example, are addressed in real time and may delay previously approved capital projects.

Witness)      Kimberly Jones

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 SECOND REQUESTS FOR INFORMATION

**REQUEST NO. 4:** Provide any current joint use agreements.

**RESPONSE:** Please see the **CONFIDENTIAL** agreements provided herewith.

Witness)      **Kimberly Jones**

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 SECOND REQUESTS FOR INFORMATION

**REQUEST NO. 15:** For Thacker-Grigsby Telephone only: Refer to Thacker Grigsby Telephone's response to Staff's First Request, Item 3(a), regarding the per pole survey fee.

a. Explain the circumstances under which the per pole survey fee estimate of \$119 was negotiated with the Commonwealth of Kentucky.

b. Explain why Thacker Grigsby Telephone is relying on market survey rates of other entities and not developing an estimate based on its own unique circumstances.

c. Explain whether Thacker Grigsby Telephone has any other support for the \$119 per pole survey fee estimate other than it was the rate negotiated with the Commonwealth of Kentucky based upon market survey rates of other entities. If so, provide additional support for the \$119. If not, provide the information Thacker Grigsby Telephone relied upon to arrive at the \$119 amount

**RESPONSE:** (a) **The per pole survey fee estimate of \$119 was negotiated with the Commonwealth of Kentucky in conjunction with the construction of the KentuckyWired network. The Commonwealth of Kentucky requested a uniform per pole survey fee across the service territory of all partner companies of East Kentucky Network, and Thacker-Grigsby accommodated that request.**

(b) **Thacker-Grigsby has historically had little to no attachment requests upon which to reasonably form an estimated survey fee. This per pole survey fee estimate has proved workable and manageable since execution of the agreement with the Commonwealth. Taking all factors into account, including that the pre-paid per pole survey fee estimate is subject to a mandatory true-up under 807 KAR 5:015, the \$119 per pole survey fee is a fair**

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

**and just rate that provides Thacker-Grigsby with reasonable security before proceeding, while protecting both Thacker-Grigsby and an attacher due to the regulation's true-up mechanism.**

**(c) The rate negotiated with the Commonwealth of Kentucky was based upon a review of various then-current invoices sent to an affiliated entity for survey fees which were calculated on a per pole basis, and used to develop a uniform rate across the Eastern Kentucky Network partner companies' service territory as requested by the Commonwealth of Kentucky (at a rate slightly lower than the average cost represented by the then-current invoices).**

**Witness) Kimberly Jones**

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 SECOND REQUESTS FOR INFORMATION

**Requests for Information Not Directed to Thacker-Grigsby: Commission Staff's**

**Second Request for Information Nos. 5-14 are not directed to Thacker-Grigsby, and no response is required.**



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 SECOND REQUESTS FOR INFORMATION

VERIFICATION

I, Kimberly Jones, 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.

  
\_\_\_\_\_

Name: Kimberly Jones

Title: Accounting Supervisor

COMMONWEALTH OF KENTUCKY )

) ss:

COUNTY OF KNOTT )

SUBSCRIBED AND SWORN TO before me by Kimberly Jones on this the 31 day of May, 2022.

My commission expires: 10/26/2024

KYNP17158

  
\_\_\_\_\_  
Notary Public