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September 15, 2025

Via Electronic Filing System

Linda C. Bridwell
Executive Director
Kentucky Public Service Commission
211 Sower Blvd.
Frankfort, KY 40602

RE: *In the Matter of Electronic Investigation of Pole Attachments, Case No. 2023-00416*

Dear Executive Director Bridwell:

Attached please find Kentucky Electric Cooperatives' (the "Cooperatives")¹ quarterly pole attachment updates filed pursuant to the Kentucky Public Service Commission's (the "Commission") May 27, 2025 order in the above-referenced case (the "Order").

In compliance with the Order and ordering paragraph 1 thereof, **Exhibit 1** provides an update of the Cooperatives' pole attachment data as of or about August 31, 2025 (the "Ordering Paragraph 1 Report").² As with the prior report, this report does not include requests to overlash given that they are subject to a different review process than other attachments under 807 KAR 5:015 and have not been part of the "backlog" in this proceeding.

¹ The following electric cooperatives are jurisdictional utilities that were made party to this case by Order: Big Rivers Electric Corporation; Big Sandy RECC; Blue Grass Energy Cooperative Corporation; Clark Energy Cooperative, Inc.; Cumberland Valley Electric, Inc.; East Kentucky Power Cooperative, Inc.; Farmers RECC; Fleming-Mason Energy Cooperative; Grayson RECC; Inter-County Energy Cooperative Corporation; Jackson Energy Cooperative Corporation; Jackson Purchase Energy Corporation; Kenenergy Corporation; Licking Valley RECC; Meade County RECC; Nolin RECC; Owen Electric Cooperative; Salt River Electric Cooperative Corporation; Shelby Energy Cooperative, Inc.; South Kentucky RECC; and Taylor County RECC. Although this filing speaks on behalf of the group's common interests, each cooperative reserves the right to also address issues on an individual basis throughout this proceeding.

² Exhibit 1 includes data from Blue Grass Energy Cooperative Corporation, Clark Energy Cooperative, Inc., Fleming-Mason Energy Cooperative, Inter-County Energy Cooperative Corporation, Owen Electric Cooperative, Salt River Electric Cooperative Corporation, Shelby Energy Cooperative, Inc., South Kentucky RECC, and Taylor County RECC – the Cooperatives that have been reporting on the "backlog" with Charter. The remaining Cooperatives, specifically, Big Rivers Electric Corporation, Big Sandy RECC, Cumberland Valley Electric, Inc., East Kentucky Power Cooperative, Inc., Farmers RECC, Grayson RECC, Jackson Energy Cooperative Corporation, Jackson Purchase Energy Corporation, Kenenergy Corporation, Licking Valley RECC, Meade County RECC, and Nolin RECC do not have a pole attachment "backlog" with Charter.

In compliance with ordering paragraph 2 of the Order, **Exhibit 2** provides an update on the number of pole attachment requests received and completed during the quarter ending on or about August 31, 2025 (the “Ordering Paragraph 2 Report”).³

The Ordering Paragraph 1 Report (Exhibit 1) cumulatively reflects that:

- There are 27,169 poles currently in the survey stage.
- The Cooperatives have approved permits to attach to 64,337 poles.
- There are 32,816 poles that are currently ready for attachment, 11,487 of which have been awaiting attachment for over 180 days.
- There are 0 poles listed in “survey overdue” status.⁴
- The “make-ready overdue” poles for Clark Energy are the result of significant reconductoring required to accommodate Charter’s attachments. This is beyond the type of make-ready contemplated by the pole attachment regulation and requires additional engineering which has delayed make-ready construction.
- The high number of cancelled permit applications for Owen Electric are the result of Charter converting submitted pole attachment applications to overlash requests.

The Ordering Paragraph 2 Report (Exhibit 2) cumulatively reflects that:⁵

- The Cooperatives routinely complete make-ready by or before the regulatory deadline.
- For many of the Cooperatives, 80% or more of requests to attach require make-ready.

In addition, the Cooperatives generally complete their tasks (initial review, surveys, and make-ready) in the pole attachment process within the regulatory timeframes absent extenuating circumstances.

³ Exhibit 2 includes data from all of the Cooperatives with the exception of East Kentucky Power Cooperative, Inc. which is filing separately.

⁴ The Alden One software used by most of the Cooperatives to process pole attachment requests shows more than 0 poles in the “survey overdue” category. However, the “survey overdue” status in Alden One is based on the Commission’s timeline requirements for standard orders. The system does not account for: (i) regulatory provisions that extend timelines for larger orders; (ii) requests submitted within 30 days of each other that may therefore be treated as a single application; or (iii) the 90-day advance notice required for larger orders. Making the adjustments for these regulatory requirements, the actual number of poles in “survey overdue” status is 0.

⁵ Requests completed may exceed requests received during the quarter as a result of the Cooperatives completing requests that were received prior to the start of the quarter.

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As is evidenced by these quarterly reports, the Cooperatives are continuing to process pole attachment requests within the timeframes established under 807 KAR 5:015, despite the increasing number of pole attachment requests.

Sincerely yours,

DINSMORE & SHOHL LLP

/s/ Edward T. Depp

Edward T. Depp

Attachment

Certification

I hereby certify that a copy of this filing has been served electronically on all parties of record through the use of the Commission's electronic filing system, and there are currently no parties that the Commission has excused from participation by electronic means. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, a paper copy of this filing has not been transmitted to the Commission.

/s/ Edward T. Depp

Counsel to Kentucky Electric Cooperatives

Exhibit 1

		Status	Blue Grass Energy	Clark Energy	Fleming-Mason Energy	Inter-County Energy	Owen Electric	Salt River	Shelby	South Kentucky RECC	Taylor County RECC	Grand Total
Pre-Draft	Attacher	Created		12	281	150	5					448
Review for Completeness		Revise Application		26	17	54	443	564				1,104
		Application Review			40							40
Survey	Pole Owner	Survey	5,991	1,315	5,984	3,763	3	1,453	98	3,797	2,247	24,651
		Survey Overdue										-
	Both Parties	Survey Review	307	501	184	286	29			794	417	2,518
Make Ready Estimate	Pole Owner	Estimate Make-Ready Costs			41	30		610		1,748		2,429
		Awaiting Customer Response	425		94	325		222				1,066
	Attacher	Customer Response Overdue		152	96	1,012	28					1,288
		Awaiting Make-Ready Payment	359	131	172		115	614			44	1,435
		Make-Ready Payment Overdue				23						23
Construction	Pole Owner	Make-Ready Construction Pending	1,290	549		85		272		535		2,731
		Make-Ready	765	227	172	100	114	177	3,080	422	51	5,108
		Make-Ready Overdue		137	9							146
	Attacher	Ready To Attach	5,250	1,317	1,922	898	263	1,623	8,135	927	5	20,340
		Attachment Extension Approved		191	164	292	342					989
		Attachment Overdue	6,522	1,287	1,171	1,977	517				13	11,487
Post Inspection	Pole Owner	Post Inspection	5,611	962	7,522	4,123	2,251	1,591	3,330	165	8	25,563
	Attacher	Corrections Needed	420		592	554	75					1,641
True Up	Pole Owner	True-Up Billing	6	3	5	20		336				370
No Action Needed		Cancel	726	331	315	114	2,329	75		281		4,171
		Complete	78	24	35	24	9	3,777				3,947
Grand Total			27,750	7,165	18,816	13,830	6,523	11,314	14,643	8,669	2,785	111,495

Exhibit 2

Cooperative	Applications Received	Applications Completed	MR Required?	Average days in Construction
Big Rivers	0	0	-	-
Big Sandy	0	0	-	-
Blue Grass	58	77	83.54%	29
Clark Energy	25	34	73.58%	92
Cumberland Valley	2	0	-	-
Fleming-Mason Energy	68	53	89.09%	39
Farmers	0	0	-	-
Grayson	1	1	100.00%	2
Inter-County	43	29	93.75%	52
Jackson	22	19		60-90
Jackson Purchase	4	3	0.00%	
Kenergy	1	1	0.00%	-
Licking Valley	2	2	0.00%	-
Meade County	1	10	96.00%	39
Nolin	10	9	0.00%	-
Owen	1	4	93.75%	67
Salt River	70	34	88.00%	82
Shelby	1	5	100.00%	All within regs.
South Kentucky	45	28	93.75%	All within regs.
Taylor County	26	0	92.86%	-