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December 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 November 30, 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 November 30, 2025 (the “Ordering Paragraph 2 Report”).³

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

- There are 11,105 poles currently in the survey stage with the Cooperatives. The Cooperatives completed surveys of an additional 13,586 poles this quarter.
- The Cooperatives have approved permits to attach to 74,640 poles.
- There are 42,451 poles that are currently ready for attachment.
- The Cooperatives moved 10,303 poles to the “ready to attach” stage during the quarter.
- The pole attachment requests submitted by Charter year-to-date are approximately double the number of requests Charter submitted in all of 2024.
- 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:⁴

- The Cooperatives routinely complete make-ready by or before the regulatory deadline.
- The median percentage of requests that require make-ready is 89.65%.

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.

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.

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

⁴ 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.

Executive Director Bridwell

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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

			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		15	202	7	2			-		226
Review for Completeness		Revise Application			12	18	443	502	46			1,021
Survey	Pole Owner	Survey	201	492	4,103	2,451	8	251		1,259	1,602	10,367
		Survey Overdue	15	33	265	418	7					738
	Both Parties	Survey Review	2,039	191	1,868	242	4			2,630	376	7,350
Make Ready Estimate	Pole Owner	Estimate Make-Ready Costs			41							41
		Estimate Overdue				419				82		501
	Attacher	Awaiting Customer Response		214	175	433		1,977			110	2,909
		Customer Response Overdue	59		20	117				698	157	1,051
		Awaiting Make-Ready Payment			33	198		516		527	194	1,468
		Make-Ready Payment Overdue		97	19	83	25					224
Construction	Pole Owner	Make-Ready Construction Pending	929	777		51		419		1,609		3,785
		Make-Ready	711	329	116	526	10	143	597		271	2,703
		Make-Ready Overdue		70	15					422		507
	Attacher	Ready To Attach	7,332	1,491	1,682	1,855	253	1,009	11,451	945	51	26,069
		Attachment Extension Approved		97	164	280	273					814
		Attachment Overdue	9,060	1,639	2,014	2,043	767			27	18	15,568
Post Inspection	Pole Owner	Post Inspection	5,785	1,140	7,896	4,459	2,319	1,281		165	8	23,053
	Attacher	Corrections Needed	266		233	438	75					1,012
True Up	Pole Owner	True-Up Billing	6	3	5	17	1	670				702
No Action Needed		Cancel	1,350	554	325	229	2,350			309		5,117
		Complete	83	24	35	36	9	4,675	2,560			7,422
		Grand Total	27,836	7,166	19,223	14,320	6,546	11,443	14,654	8,673	2,787	112,648

Exhibit 2

Cooperative	Applications Received	Applications Completed	MR Required?	Average days in Construction
Big Rivers	0	0	-	-
Big Sandy	0	0	-	-
Blue Grass	75	157	66.24%	17
Clark Energy	19	34	47.10%	54
Cumberland Valley	0	6	50.00%	72
Fleming-Mason Energy	27	31	96.77%	43
Farmers	0	0	-	-
Grayson	15	2	100.00%	All within Regs.
Inter-County	60	58	89.65%	17
Jackson	21	20	35.00%	21
Jackson Purchase	28	0	100.00%	40
Kenergy	4	10	70.00%	64
Licking Valley	2	2	100.00%	21
Meade County	3	12	100.00%	23
Nolin	5	-	20.00%	7
Owen	22	24	62.50%	26
Salt River	4	17	100.00%	86
Shelby	1	9	100.00%	All within Regs.
South Kentucky	5	13	79.00%	-
Taylor County	7	1	100.00%	40