

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC INVESTIGATION)	
OF POLE ATTACHMENTS)	CASE NO. 2023-00416
)	

**COMMENTS OF KENTUCKY’S ELECTRIC COOPERATIVES
IN RESPONSE TO FEBRUARY 29, 2024 ORDER**

Kentucky’s electric cooperatives,¹ by counsel and pursuant to the Commission’s Order entered February 29, 2024 (the “Order”) in the above-captioned matter, respectfully propose the following topics for discussion at the Commission’s March 22, 2024, conference regarding 807 KAR 5:015, issues related to pole attachments, and the extension of broadband services throughout Kentucky.

I. Potential Pole Attachment Discussion Topics.

Consistent with discussions at the preceding informal conferences, Kentucky’s electric cooperatives continue to emphasize the vital importance of a safe and reliable electric grid. To this end, the electric cooperatives believe it would be beneficial to discuss the following topics at the March 22, 2024, informal conference:

- (1) quality of engineering submissions;

¹ The following electric cooperatives are jurisdictional utilities that were made party to this case by the 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; Kenergy 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) safe construction practices and code conformance;
- (3) timely notifications of attachment; and
- (4) post-construction inspections.

In addition, and as requested at the March 1 informal conference, McLean Engineering is prepared to provide a brief overview of the electric cooperatives' engineering and make-ready processes. In order to facilitate a better understanding of this process and the attendant considerations, it may also be helpful to schedule a separate field visit to some nearby poles. The electric cooperatives are happy to coordinate and arrange this if the Commission believes that would be helpful to its understanding of these issues.

II. Conclusion.

Kentucky's electric cooperatives thank the Commission for its continued attention to these important issues, and they look forward to furthering this process in a manner that will continue to support statewide broadband access while ensuring electric system safety, reliability, and affordability.

This the 8th day of March, 2024.

Respectfully submitted,

/s/ Edward T. Depp

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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.

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