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**Public Service Commission** 

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

## -M-E-M-O-R-A-N-D-U-M-

DATE:	July 27, 2018
TO:	Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk

FROM: Samantha Cibula , Office of the General Counsel

**RE:** Docket No. 20060243-EI

Please file the attached materials in the docket file listed above.

Thank you.

Attachment

ECEIVED-FPSC

SIM



JOHN T. BURNETT ASSOCIATE GENERAL COUNSEL PROGRESS ENERGY SERVICE COMPANY, LLC

March 15, 2006

20060243

## VIA ELECTRONIC FILING

Ms. Chris Moore Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Dear Ms. Moore:

As a follow up to the Commission's February 22, 2006 Rule Workshop regarding Rules 25-6.044 and 25-6.0455, Florida Administrative Code, please accept this letter and attachment as post-workshop comments on behalf of Florida Power and Light, Gulf Power Company, Progress Energy Florida, and Tampa Electric Company (hereinafter collectively referred to as the "IOUs"). Attached as Exhibit A to this letter is a proposed revised Rule 25-6.0455 that reflects the comments, positions, and suggestions offered by the IOUs at the aforementioned workshop.

Consistent with our discussions at the rule workshop, the attached proposed Rule 25-6.0455 deletes subsection (3) of the current rule. As discussed, Staff has expressed concern that the current "exclusion filing" provision in this subsection may be subject to overuse, so we simply deleted it in the attached proposed rule.

We also propose keeping subsection (2) as it appears in the existing rule in recognition of the fact that subsection (2) hasn't presented any reporting problems and has properly recognized the significant effects of named storms, tornadoes, and the like. Subsection (2) of the attached proposed rule, however, has been modified to incorporate definitions that Staff has proposed for "planned service interruptions" and "generation and transmission disturbances." These additions add further clarity to the excluded events listed in the current subsection (2).

Finally, the attached proposed rule also includes all of Staff's changes regarding actual and adjusted data reporting requirements. As discussed in detail at the workshop, unadjusted data may not be extremely useful to Staff, and Staff may want to consider collecting such data on a more limited and informal basis, such as a pilot program, to see if such data does in fact prove to be useful over the course of two or three years. Nevertheless, the IOUs understand that Staff wishes to have actual, unadjusted data reported each year along with adjusted data reports. The IOUs reiterate, however, that unadjusted data is just that, and the IOUs respectfully suggest and request that Staff work with the IOUs to inform the public, the media, and any others that may have access to such data in the future that unadjusted data cannot properly be quantitatively and qualitatively used to make inter and intra-utility reliability comparisons.

100 Central Avenue (33701)Post Office Box 14042 (33733)St. Petersburg, FloridaPhone: 727.820.5184Fax: 727.820.5249Email: john.burnett@pgnmail.com

In summary, the IOUs believe that the attached proposed rule addresses the issues and concerns that Staff raised in the February workshop and that the proposed rule will allow the IOUs to function under a familiar, yet enhanced and better defined process. The IOUs strongly recommend that Staff adopt the attached proposed rule, and the IOUs remain ready to answer any questions that Staff may have.

Respectfully submitted,

burnett

John T. Burnett

CC: Florida Power and Light Gulf Power Company Tampa Electric Company Mr. Bob Trapp Mr. Bill McNulty Mr. Jim Breman

> 100 Central Avenue (33701) Post Office Box 14042 (33733) St. Petersburg, Florida Phone: 727.820.5184 Fax: 727.820.5249 Email: john.burnett@pgnmail.com

Annual Distribution Service Reliability Report.

(1) Each utility shall file a Distribution Service Reliability Report with the Director of the Commission's Division of Economic Regulation on or before March 1st of each year, for the preceding calendar year. The report shall contain the following information on an actual and adjusted basis:

(a) The utility's total number of Outage Events (N), categorized by cause for the highest 10 causes of Outage Events, the Average Duration of Outage Events (L-Bar), and Average Service Restoration Time (CAIDI). The utility shall record these data and analyses on Form PSC/ECR 102-1(a) (\_/06) and Form PSC/ECR 102-1(b) (\_/06), entitled "Causes of Outage Events-Actual" and "Causes of Outage Events-Adjusted," respectively, which may be obtained from the Division of Economic Regulation, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, (850) 413-6900, and which are incorporated herein by reference;

(b) Identification of the three percent of the utility's Primary Circuits (feeders) with the highest number of feeder breaker interruptions. For each primary circuit so identified the utility shall report the primary circuit identification number or name, substation origin, general location, number of affected customers by service class served, Number of Outage Events (N), Average Duration of Outage Events (L-Bar), Average Service Restoration Time (CAIDI), whether the same circuit is being reported for the second consecutive year, the number of years the primary circuit was reported on the "Three Percent Feeder List" in the past five years, and the corrective action date of completion. The utility shall record these data and analyses on Form PSC/ECR 102-2(a) (\_/06) and Form PSC/ECR 102-2(b) (\_/06), entitled "Three Percent Feeder List-Actual" and "Three Percent Feeder List-Adjusted," respectively, which may be obtained from the Division of Economic Regulation, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, (850) 413-6900, and which are incorporated herein by reference;

(c) The reliability indices SAIDI, CAIDI, SAIFI, MAIFIe, and CEMI5 for its system and for each district or region into which its system may be divided. The utility shall report these data and analyses on Form PSC/ECR 102-3(a) (\_/06) and Form PSC/ECR 102-3(b) (\_/06), entitled "System Reliability Indices-Actual" and "System Reliability Indices Adjusted," respectively, which may be obtained from the Division of Economic Regulation, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, (850) 413-6900, and which are incorporated herein by reference. Any utility furnishing electric service to fewer than 50,000 retail customers shall not be required to report the reliability indices MAIFIe or CEMI5;

(d) The calculations for each of the required indices and measures of distribution reliability.

(2) A utility may exclude from the Annual Distribution Service Reliability Report the Outage Events directly caused by one or more of the following: planned interruptions initiated by the utility to perform necessary activities for public safety reasons or for scheduled activities such as maintenance, infrastructure improvements, and new construction due to customer growth, a storm named by the National Hurricane Center, a tornado recorded by the National Weather Service, ice on lines, a planned load management event, the impact of all service interruptions associated with generation and transmission disturbances governed by Section 25-6.018(2) and (3), Florida Administrative Code, or an extreme weather or fire event causing activation of the county emergency operation center.

STATE OF FLORIDA



OFFICE OF THE GENERAL COUNSEL HAROLD A. MCLEAN GENERAL COUNSEL (850) 413-6199

## Hublic Service Commission

September 16, 2002

Mr. John Rosner Joint Administrative Procedures Committee Room 120, Holland Building Tallahassee, Florida 32399-1300

## Re: Rule 25-6.0455

Dear Mr. Rosner:

COMMISSIONERS:

J. TERRY DEASON BRAULIO L. BAEZ

MICHAEL A. PALECKI

LILA A. JABER, CHAIRMAN

RUDOLPH "RUDY" BRADLEY

This letter is in response to your memorandum dated September 12, 2002, regarding the forms identified in the above rule. Copies of the three forms are enclosed.

I apologize for inadvertently failing to send you copies of the forms along with the rule proposal package. As you can see, the forms do not impose any requirement or solicit any information not specifically required by Rule 25-6.0455. Thus, because the forms do not meet the definition of "rule" in section 120.52(15), Florida Statutes, the requirements of section 120.55(1)(a)4. to state in the rule the respective effective dates of the forms and that they are incorporated by reference do not apply.

I hope this response satisfactorily addresses your concerns. Please do not hesitate to call me if you have questions.

Sincerely,

instiana I. Moore

Christiana T. Moore Associate General Counsel

Enclosures

PSC Website: http://www.floridapsc.com

Internet E-mail: contact@psc.state.fl.us