



FECA

Florida Electric Cooperatives Association, Inc.

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July 15, 2019

VIA ELECTRONIC FILING

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

IN RE: PROPOSED ADOPTION OF RULE 25-6.030, F.A.C., STORM PROTECTION PLAN AND RULE 25-6.031, F.A.C, STORM PROTECTION COST RECOVERY CLAUSE, AND PROPOSED AMENDMENT OR REPEAL OF RULE 25-6.0143, USE OF ACCUMULATED PROVISION ACCOUNTS 228.1, 228.2, AND 228.4, RULE 25-6.034, STANDARD OF CONSTRUCTION, RULE 25-6.0341, LOCATION OF THE UTILITY'S ELECTRIC DISTRIBUTION FACILITIES, RULE 25-6.0342, ELECTRIC INFRASTRUCTURE STORM HARDENING, RULE 25-6.0343, MUNICIPAL ELECTRIC UTILITY AND RURAL ELECTRIC COOPERATIVE REPORTING REQUIREMENTS, RULE 25-6.0345, SAFETY STANDARDS FOR CONSTRUCTION OF NEW TRANSMISSION AND DISTRIBUTION FACILITIES, RULE 25-6.044, CONTINUITY OF SERVICE, RULE 25-6.0455, ANNUAL DISTRIBUTION SERVICE RELIABILITY REPORT, RULE 25-6.061, RELOCATION OF POLES, RULE 25-6.064, CONTRIBUTION-IN-AID-OF-CONSTRUCTION FOR INSTALLATION OF NEW OR UPGRADED FACILITIES, RULE 25-6.077, INSTALLATION OF UNDERGROUND DISTRIBUTION SYSTEMS WITHIN NEW SUBDIVISIONS, RULE 25-6.078, SCHEDULE OF CHARGES, RULE 25-6.081, CONSTRUCTION PRACTICES, RULE 25-6.115, FACILITY CHARGES FOR CONVERSION OF EXISTING OVERHEAD INVESTOR-OWNED DISTRIBUTION FACILITIES; DOCKET NO. 20190131-EU

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket, are the Florida Electric Cooperatives Association, Inc.'s ("FECA") Post-Workshop Comments and a red-lined version of a proposed change to Rule 25-6.0343, F.A.C.

Thank you for your assistance in this matter. Please call me if you have any questions regarding the filing.

Respectfully submitted,

By: /s/Michelle Hershel
Michelle Hershel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: PROPOSED ADOPTION OF RULE 25-6.030, F.A.C., STORM PROTECTION PLAN AND RULE 25-6.031, F.A.C., STORM PROTECTION COST RECOVERY CLAUSE, AND PROPOSED AMENDMENT OR REPEAL OF Rule 25-6.0143, Use of Accumulated Provision Accounts 228.1, 228.2, and 228.4, Rule 25-6.034, Standard of Construction, Rule 25-6.0341, Location of the Utility's Electric Distribution Facilities, Rule 25-6.0342, Electric Infrastructure Storm Hardening, Rule 25-6.0343, Municipal Electric Utility and Rural Electric Cooperative Reporting Requirements, Rule 25-6.0345, Safety Standards for Construction of New Transmission and Distribution Facilities, Rule 25-6.044, Continuity of Service, Rule 25-6.0455, Annual Distribution Service Reliability Report, Rule 25-6.061, Relocation of Poles, Rule 25-6.064, Contribution-in-Aid-of-Construction for Installation of New or Upgraded Facilities, Rule 25-6.077, Installation of Underground Distribution Systems within New Subdivisions, Rule 25-6.078, Schedule of Charges, Rule 25-6.081, Construction Practices, Rule 25-6.115, Facility Charges for Conversion of Existing Overhead Investor-owned

Docket No. 20190131-EU

Filed: July 15, 2019

POST-WORKSHOP COMMENTS OF THE FLORIDA ELECTRIC COOPERATIVES ASSOCIATION, INC.

The Florida Electric Cooperatives Association, Inc. ("FECA") offers the following post-workshop comments on behalf of its member-cooperatives¹:

At this time, FECA has no comments on proposed Rule 25-6.030, F.A.C., Storm Protection Plan and Rule 25-6.031, F.A.C., Storm Protection Cost Recovery Clause.² However, since several existing rules are now open for amendments in this docket, FECA believes it is timely to ask for a

¹ Central Florida Electric Cooperative, Inc., CHELCO, Clay Electric Cooperative, Inc., Escambia River Electric Cooperative, Inc., Florida Keys Electric Cooperative Association, Inc., Glades Electric Cooperative, Inc., Gulf Coast Electric Cooperative, Inc., Okefenokee Rural Electric Membership Corporation, Peace River Electric Cooperative, Inc., PowerSouth Energy Cooperative, Seminole Electric Cooperative, Inc., Sumter Electric Cooperative, Inc., Suwannee Valley Electric Cooperative, Inc., Talquin Electric Cooperative, Inc., Tri-Count Electric Cooperative, Inc., West Florida Electric Cooperative Association, Inc., Withlacoochee River Electric Cooperative, Inc.

² FECA reserves the right to participate and offer comments on those proposed rules in the event future workshops on the proposals are conducted.

modification to the reporting requirements for electric cooperatives (“co-ops”) and municipal electric utilities (“munis”) under Rule 25-6.0343, F.A.C., Municipal Electric Utility and Rural Electric Cooperative Reporting Requirements (“Standards of Construction”). Under the existing rule, co-ops and munis are required to file their Standards of Construction reports with the Commission Clerk on an annual basis. For reasons explained below, FECA respectfully requests that the rule be amended to require Standards of Construction reports from co-ops and munis be filed every 3 years instead of annually.

FECA believes a 3 year reporting schedule will not affect the quality or usefulness of the reports. Staff will be provided with the necessary information to evaluate and review the status of each co-op and muni construction standards, policies, practices and procedures albeit in a slightly expanded schedule. The 3 year schedule is consistent with existing Rule 25-6.0342, F.A.C., Electric Infrastructure Storm Hardening for the investor-owned utilities (“IOUs”) and the proposed Storm Protection Plan rules. In addition, at the June 25, 2019 workshop there was a desire by the IOUs to reduce the number of reports, repeal obsolete provisions and ensure consistency. FECA supports this goal and believes its requested modification to Rule 25-6.0343, F.A.C. is consistent with this objective.

The reporting requirement of Rule 25-.0343, F.A.C. has been in place now for 13 years. Each year, the PSC staff must review 16 reports from the co-ops and 33 reports from the munis. To date, over 600 reports have been filed with the Commission. The reports provide the Commission with information to evaluate the status of each affected utilities’ infrastructure hardening efforts. However, infrastructure hardening initiatives are rarely initiated and completed within a 12 month period, which makes them difficult to capture in an annual report. Thus, FECA believes the 3 year reporting schedule will actually allow staff to see a larger picture of the co-ops’

and the munis' efforts to harden their respective systems. The 3 year reporting schedule also will lessen the workload for PSC and utility staff without reducing the usefulness of the reports. In addition, to ensure that PSC staff is not overburdened with reviewing IOU storm plans and co-op/muni reports at the same time, FECA would suggest that the 3 year period begin on a date which would stagger the co-op/muni reports from the IOU storm plan filings.

For the reasons stated above, FECA respectfully requests Rule 25-6.0343, F.A.C. be amended to allow co-ops and munis to file reports with the Commission Clerk every 3 years. The proposed amendment is on the attached red-lined version of the rule (Attachment A).

Respectfully submitted,

By: /s/Michelle Hershel

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ATTACHMENT A
PROPOSED AMENDMENT TO Rule 25-6.0343, F.A.C.

25-6.0343 Municipal Electric Utility and Rural Electric Cooperative Reporting

Requirements.

(1) Application and Scope. The purpose of this rule is to define certain reporting requirements by municipal electric utilities and rural electric cooperatives providing distribution service to end-use customers in Florida.

(2) The reports required by subsections (3), (4), and (5) of this rule shall be filed with the Commission Clerk ~~by March 1 of each year for the preceding calendar year~~ every 3 years beginning March 1.

(3) Standards of Construction. Each municipal electric utility and rural electric cooperative shall report the extent to which its construction standards, policies, practices, and procedures are designed to address the ability of transmission and distribution facilities to mitigate damage caused by extreme weather. Each utility report shall, at a minimum, address the extent to which its construction standards, policies, guidelines, practices, and procedures:

(a) Comply, at a minimum, with the National Electrical Safety Code (ANSI C-2) [NESC]. For electrical facilities constructed on or after February 1, 2007, the 2007 NESC shall apply. Electrical facilities constructed prior to February 1, 2007, shall be governed by the edition of the NESC in effect at the time of the facility's initial construction. A copy of the 2007 NESC, ISBN number 0-7381-4893-8, may be obtained from the Institute of Electric and Electronic Engineers, Inc. (IEEE).

(b) Are guided by the extreme wind loading standards specified by Figure 250-2(d) of the 2002 edition of the NESC for:

1. New construction;
2. Major planned work, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule; and

3. Targeted critical infrastructure facilities and major thoroughfares taking into account political and geographical boundaries and other applicable operational considerations.

(c) Address the effects of flooding and storm surges on underground distribution facilities and supporting overhead facilities.

(d) Provide for placement of new and replacement distribution facilities so as to facilitate safe and efficient access for installation and maintenance.

(e) Include written safety, pole reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles.

(4) Facility Inspections. Each municipal electric utility and rural electric cooperative shall report, at a minimum, the following information pertaining to its transmission and distribution facilities:

(a) A description of the utility's policies, guidelines, practices, and procedures for inspecting transmission and distribution lines, poles, and structures including, but not limited to, pole inspection cycles and pole selection process.

(b) The number and percentage of transmission and distribution inspections planned and completed.

(c) The number and percentage of transmission poles and structures and distribution poles failing inspection and the reason for the failure.

(d) The number and percentage of transmission poles and structures and distribution poles, by pole type and class of structure, replaced or for which remediation was taken after inspection, including a description of the remediation taken.

(5) Vegetation Management. Each municipal electric utility and rural electric cooperative shall report, at a minimum, the following information pertaining to the utility's vegetation

management efforts:

(a) A description of the utility's policies, guidelines, practices, and procedures for vegetation management, including programs addressing appropriate planting, landscaping, and problem tree removal practices for vegetation management outside of road right-of-ways or easements, and an explanation as to why the utility believes its vegetation management practices are sufficient.

(b) The quantity, level, and scope of vegetation management planned and completed for transmission and distribution facilities.

Rulemaking Authority 350.127(2), 366.05(1) FS. Law Implemented 366.04(2)(f), (6) FS.

History—New 12-10-06.