

**Antonia Hover**

---

**From:** Betty Leland  
**Sent:** Wednesday, September 25, 2019 9:24 AM  
**To:** Commissioner Correspondence  
**Subject:** FW: Rule Development -Docket # 20190131 & concerns re Undergrounding in Flood Zones

Good Morning:

Please place the attached email in Docket # 20190131.

Thanks.

*Betty Leland, Executive Assistant to  
Chairman Art Graham  
Florida Public Service Commission  
[bleland@psc.state.fl.us](mailto:bleland@psc.state.fl.us)  
(850) 413-6024*

**From:** [kcisarik@aol.com](mailto:kcisarik@aol.com) [<mailto:kcisarik@aol.com>]  
**Sent:** Tuesday, September 24, 2019 5:31 PM  
**To:** Office Of Commissioner Graham  
**Cc:** Office Of Commissioner Clark; Office of Commissioner Brown; Office of Commissioner Polmann; Office of Commissioner Fay; Penny Buys; Robert Graves; Records Clerk; JR Kelly  
**Subject:** Rule Development -Docket # 20190131 & concerns re Undergrounding in Flood Zones

Dear PSC Chair Graham, Commissioners & Staff members,

I sent a letter to the Commissioners and Staff on July 15 to ask how the current 14 PSC rules under review in docket # 20190131 could be used to regulate the placement of underground utilities in flood zones. I had hoped to get some specific answers from staff before the full commission met to begin the rule development revision. So far I have not gotten any response.

I posed 5 questions below to staff on July 15th. In addition to those questions I want to ask two broader questions about future electric utility projects to be located in flood zones :

- A.) As part of this docket, will the PSC develop guidelines for when it IS and IS NOT appropriate to place underground utilities in flood zones, and specifically in coastal areas that are subject to storm surge?**
- B.) Or will staff be attempting to look at each future proposed flood zone project individually to evaluate it for storm surge risks, potential for extended service outages and environmental impacts from damage to the oil filled transformers ?**

These were my original questions below from July 15th about rule development related to Storm Protection Plans:

**Re: Rules Development Docket number 20190131**

Could staff respond and can tell me which of the 14 rules outlined in this docket could currently address or be revised to address the concerns that I bring up below?

1. For Flood Zone use, can you tell me if there are any current rules that require manufacturer or utility company testing of transformers and switch gears and who is certified to do that testing?

For example, is there an independent group like Underwriters Laboratory that must certify that assembled electrical components for flood zone uses are rated as water tight?

2. Would new rules be required to allow the PSC to make sure components of underground systems have been rigorously tested before they are funded and permanently installed?

3. In Flood zones, will utilities still be permitted to self-regulate when city and county funding is used to to upgrade projects to do undergrounding? ie who will decide placement of transformers and

switch gears and will those components be permitted to be placed at ground level in flood zones?

4. Is any climate change modeling being incorporated into the rules for storm hardening plans?

5. Will beautification projects be funded if they have some secondary benefits as storm hardening? How can you separate storm hardening from beautification ?

**I believe some of my concerns fall under Rule 25-6.0342(3) which states: "Each utility storm hardening plan shall contain a detailed description of the construction standards, policies, and procedures employed to enhance the reliability of overhead and underground electrical transmission and distribution facilities".**

**With passage of the new law related to Public Utility Storm Hardening Plans the burden of payment for storm hardening has now shifted from the utilities squarely onto the ratepayer so I think the PSC needs some new tools in its toolbox to prevent the consumer from paying for projects that could be severely damaged by floods and storm surge.**

I hope you will both amend what you have on the books and enact some new rules to address these critical issues. Thank you for considering these issues carefully.

Sincerely,

Kelly Cisarik  
Ratepayer from Indian Rocks Beach, FL