

Ereecy McNeal

From: Betty Leland
Sent: Tuesday, November 05, 2019 9:09 AM
To: Commissioner Correspondence
Subject: FW: Public Comments on PSC Hearing Nov 5 Docket # 20190131

Good Morning:

Please place this email in Docket #20190131.

Thanks.

*Betty Leland, Executive Assistant to
Chairman Art Graham
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From: kcisarik@aol.com [<mailto:kcisarik@aol.com>]
Sent: Monday, November 04, 2019 4:54 PM
To: Office Of Commissioner Graham
Cc: Office of Commissioner Fay
Subject: Public Comments on PSC Hearing Nov 5 Docket # 20190131

Dear Chair Graham and PSC Commissioners,

I had hoped to come before you personally to address the commission or be allowed to participate by phone to read these comments, but that was not permitted. I am requesting that one of you please read my comments into the record of the meeting to reconsider Rules 25-6.030 AND 25-6.031, F.A.C.

The Public Service Commission was charged with proposing new rules to enact new Storm Protection Plan legislation and to accomplish that by October 31, 2019. You have done that.

However, I am concerned that those rules are not fully developed and don't provide adequate transparency so that the PSC staff and the Commission will know what projects they are actually approving after Year-1 in the Storm Protection Plans. As ratepayers, we need protection from double billing. We also need to know that the projects prudently approved in Year-1 of the plans stay in those plans. We also need protection from unvetted and potentially ill-advised projects from being substituted in Year-2 and Year-3 of these storm plans.

Indeed, your own staff recommended that they be provided info on what each utility proposes to construct for the first three years of each plan. How can you protect the rate payers from writing a blank check without having that detail upfront?

The new rules you have approved encourage utility undergrounding in agreement with the intent of the legislation. But as you know, there are serious considerations around undergrounding that you have yet to address. Undergrounding can make the grid more secure and reduce post-storm restoration times in many areas but it can do the opposite in flood zone areas prone to storm surge. I'm concerned with two issues: location suitability and cost. I have yet to see anything in the new PSC rules to address location suitability or excessive cost of undergrounding. In my county, we have a \$3.5 million per mile proposal under consideration to underground a 13 mile stretch of coastal road that is in a flood zone.

I am concerned that utility rate payers system-wide may be asked to pay for local "Sand Castle" proposals like ours in future Storm Protection Plans which are too expensive and are at risk of being destroyed by storm surge. I'm not qualified to give you future sea level projections and tell you what areas are in greatest risk of either storm surge or sea level rise, but I can tell you that people along the coast are a lot more concerned about future intensity of hurricanes after Irma in 2017 and Michael in 2018 and you should be too.

We have to think NOW about what storm surge can do before a major storm or sea level rise inundates our coastal areas. My utility, Duke Energy utilizes some transformers in coastal areas that are supposed to have a 30 year lifespan, but I wonder how many will make it that long, particularly if submerged in salt water. It is alarming to see placement of this equipment at ground level in coastal areas and I want the commission to come up with some guidelines to address that.

The PSC must develop rules that mandate when equipment must be elevated, when placed in flood zones. The PSC is the only body with the power to make rules for utilities. This should not be left to each individual company. I would add that In coastal flood zone areas of our state the Florida Building Code mandates that even individual electric meters and air conditioning equipment be elevated.

Now that the ratepayers will be asked to pay upfront for storm hardening projects, there has to be more careful consideration of where undergrounding should be used and find ways to elevate the most expensive equipment when it is used in flood zones.

The current rules passed on Oct. 3 don't require enough detail be in the programs in Year-2 and Year-3 to even know which projects will be in flood zones. I would urge you to go back to staff's original recommendations for project level detail in years 1-3 of Storm Protection Plans and specifically identify all proposed projects that are in flood zones.

The PSC is placing too much trust in Investor Owned Utilities companies to bring forward projects that benefit the ratepayers. I am asking the Commission to instead rework the Storm Protection Plan rules and substitute verification for that trust.

Thank you for considering my comments.

**Kelly Cisarik, Ratepayer
Indian Rocks Beach**