

**REDACTED**

**ATTACHMENT B**

**BellSouth Telecommunications, Inc.  
FPSC Dkt No. 060598-TL  
Request for Confidential Classification  
Page 1 of 1  
12/1/06**

**REQUEST FOR CONFIDENTIAL CLASSIFICATION OF BELLSOUTH'S REVISED  
RESPONSE TO CITIZEN'S 1<sup>ST</sup> SET OF INTERROGATORIES, ITEM NO. 4,  
(ATTACHMENT) AND FIRST REQUEST FOR PRODUCTION, ITEM NO. 2, FILED  
DECEMBER 1, 2006**

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*Sec 1*

DOCUMENT NUMBER-DATE  
11083 DEC-1 06  
FPSC-COMMISSION CLERK

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BellSouth Telecommunications, Inc.  
 Florida Public Service Commission  
 Docket No. 060598-TL  
 Citizen's 1<sup>st</sup> Interrogatories  
 September 11, 2006  
 REVISED Item No. 4 Attachment  
**PROPRIETARY**

(\$ in thousands)

| Year       | Named Storm(s)                                 | Capital | Intrastate Capital | Incremental Expense | Incremental Intrastate Expense |
|------------|--|---------|--------------------|---------------------|--------------------------------|
| 1998       | H Earl   |         |                    |                     |                                |
|            | H Georges                                      |         |                    |                     |                                |
| 1999       | H Irene  |         |                    |                     |                                |
| 2000       | H Gordon <sup>1</sup>                          |         |                    |                     |                                |
| 2001       | TS Allison, TS Barry, H Gabrielle <sup>2</sup> |         |                    |                     |                                |
| 2002       | TS Edouard                                     |         |                    |                     |                                |
| 2003       | TS Henri                                       |         |                    |                     |                                |
| 2004*      | H Charley                                      |         |                    |                     |                                |
|            | H Frances                                      |         |                    |                     |                                |
|            | H Jeanne                                       |         |                    |                     |                                |
|            | H Ivan   |         |                    |                     |                                |
| Total 2004 |  |         |                    |                     |                                |
| 2005       | TS Arlene                                      |         |                    |                     |                                |
|            | H Cindy  |         |                    |                     |                                |
|            | H Dennis                                       |         |                    |                     |                                |
|            | H Katrina                                      |         |                    |                     |                                |
|            | H Rita   |         |                    |                     |                                |
|            | H Wilma  |         |                    |                     |                                |
| Total 2005 |  |         |                    |                     |                                |

\* BellSouth tracked recovery costs for 2004 storms as a group rather than tracking individual storms.

<sup>1</sup> Includes impacts of TS Helene which struck one day after H Gordon.

<sup>2</sup> TS Allison and TS Barry caused only minor damage in Florida. For this reason, the impacts were included with H Gabrielle at the time of the damage estimate.

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FPSC-COMMISSION CLERK

BellSouth Telecommunications, Inc.  
Florida Public Service Commission  
Docket No. 060598-TL  
Citizen's 1<sup>st</sup> Requests for Production  
September 11, 2006  
REVISED Item No. 2  
ATTACHMENT

**PROPRIETARY**






**PAGE**  
**REDACTED**



**BellSouth Telecommunications, Inc. - Florida**  
**Calculation of Hypothetical Storm Reserve Balance**  
**\$ in 000s**

**Worksheet 1**

**(Dr) Cr to the Reserve**

**Amounts**


- |   |   |
|---|---|
| 1. Storm Reserve Accruals 1994 - 2005 (\$10M per year times 12 years)                             |  |
| 2. Incremental Intrastate Storm Expense/Reversals (See Worksheets 2 and 3)                        |  |
| 3. Hypothetical Storm Reserve Deficit before any recovery from Storm Petition (Ln 1 + Ln 2)       |  |
| 4. Estimated Maximum Recovery Requested in Storm Petition (per Kathy Blake Surrebuttal Testimony) |  |
| 5. Hypothetical Storm Reserve Deficit after Recovery (Ln 3 + Ln 4)                                |  |

**Note:** In addition to the \$M in incremental intrastate storm expense used in the calculation above, BellSouth also incurred \$M in intrastate capital as a result of the named storms.

2

**BellSouth Telecommunications, Inc. - Florida**  
**Summary of Intrastate Incremental Storm Expense for 1994 - 2005**  
**\$ in 000s**

**Worksheet 2**

| <u>Storm Year</u>  | <u>Named Storms</u>   | <u>Incremental Intrastate Expense</u>  | <u>Source of Storm Damage Incremental Expense Estimates</u>               |
|--|---|--|---|
| 1994-1997  | TS Gordon, H. Erin, H. Opal                                   |  | Amounts were booked and used in sharing calculations pre Price Regulation |
| 1998   | H. Earl, H. Georges   |  | Network Field Operations  |
| 1999   | H. Irene  |  | Network Field Operations  |
| 2000   | H. Gordon   |  | Network Field Operations  |
| 2001   | TS Allison, TS Barry, H. Gabrielle                            |  | Network Field Operations  |
| 2002   | TS Edouard  |  | Network Field Operations  |
| 2003   | TS Henri  |  | Network Field Operations  |
| 2004   | H. Charley, H. Frances, H. Jeanne, H. Ivan                    |  | Network Field Operations  |
| 2005   | TS Arlene, H. Cindy, H. Dennis, H. Katrina, H. Rita, H. Wilma |  | Florida Storm Recovery Filing - September 1, 2006                         |
| Total Incremental Intrastate Storm Expense for 1994 through 2005 |   |  |   |

**Note:**

See Worksheet 3 for calculations of the incremental intrastate expense amounts shown above.

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**BellSouth Telecommunications, Inc. - Florida**  
**Calculation of Intrastate Storm Costs**  
**\$ in 000s**

**Worksheet 3**

| <u>Col A</u>      | <u>Col B</u>               | <u>Col C</u>   | <u>Col D</u> | <u>Col E</u>            | <u>Col F</u>              | <u>Col G</u><br>(B + E) | <u>Col H</u><br>(C + F) | <u>Col I</u><br>(G + H) |
|-------------------|----------------------------|----------------|--------------|-------------------------|---------------------------|-------------------------|-------------------------|-------------------------|
| <u>Storm Year</u> | <u>Incremental Expense</u> | <u>Capital</u> | <u>Total</u> | <u>Intra Exp Factor</u> | <u>Intra Plant Factor</u> | <u>Intra Exp</u>        | <u>Intra Cap</u>        | <u>Total Intra</u>      |
| 1994-1997         |                            |                |              |                         |                           |                         |                         |                         |
| 1998              |                            |                |              |                         |                           |                         |                         |                         |
| 1999              |                            |                |              |                         |                           |                         |                         |                         |
| 2000              |                            |                |              |                         |                           |                         |                         |                         |
| 2001              |                            |                |              |                         |                           |                         |                         |                         |
| 2002              |                            |                |              |                         |                           |                         |                         |                         |
| 2003              |                            |                |              |                         |                           |                         |                         |                         |
| 2004              |                            |                |              |                         |                           |                         |                         |                         |
| 2005              |                            |                |              |                         |                           |                         |                         |                         |
| Totals Thru 2005  |                            |                |              |                         |                           |                         |                         |                         |

**Notes:**

1. Column E jurisdictional factors were computed from Florida ARMIS 43-01, Plant Specific and Non-Specific Operating Expenses.
2. Column F jurisdictional factors were computed from Florida ARMIS 43-01, Total Plant in Service.

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