

Dorothy Menasco

From: Kelly, Tamela D [EQ] [Tamela.Kelly@Embarq.com]
Sent: Thursday, July 12, 2007 4:22 PM
To: Filings@psc.state.fl.us
Cc: Sandy Khazraee
Subject: 070300-EI, Embarq's Comments to FPUC, 2007 - 2009 Storm Hardening Plan
Attachments: 070300-EI, Embarq's Comments to FPUC, 7-12-07.pdf

ORIGINAL

Filed on Behalf of: **Sandra A. Khazraee**

**Regulatory Manager
Embarq Florida, Inc.
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Docket No. **070300-EI, Review of 2007 Electric Infrastructure Storm Hardening Plan** filed pursuant to Rule 25-6.0342, F.A.C., **submitted by Florida Public Utilities Company.**

Title of filing: **Embarq's Comments to Florida Public Utilities Company, 2007 - 2009 Storm Hardening Plan**

Filed on behalf of: **Sandra A. Khazraee**

No of pages: **2**

Description: **Embarq's Comments to Florida Public Utilities Company, 2007 - 2009 Storm Hardening Plan**

<<070300-EI, Embarq's Comments to FPUC, 7-12-07.pdf>>

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July 12, 2007

Ms. Ann Cole
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

ORIGINAL

Re: Docket No. 070300-EI, Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Florida Public Utilities Company.

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida, Inc. is a copy of Embarq's comments provided to Florida Public Utilities Company, regarding the 2007 - 2009 Storm Hardening Plan. Please include Embarq's comments in above referenced docket.

Any questions you may have regarding this filing may be directed to my attention at 850-847-0173.

Sincerely,

Sandra A. Khazraee
Regulatory Manager
Embarq Florida

Enclosure

Sandra A. Khazraee
REGULATORY MANAGER
LAW AND EXTERNAL AFFAIRS
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July 12, 2007

Mr. Mark Cutshaw, General Manager
Florida Public Utilities Company
911 South 8th Street
Fernandina Beach, Florida 32034

In RE: Florida Public Utilities Company 2007 – 2009 Storm Hardening Plan

Dear Mr. Cutshaw:

Embarq has reviewed the FPUC Storm Hardening Plan received on Sunday, June 24, 2007 for the years 2007 through 2009. While the plan provided some specifics, e.g. the intent to harden the facilities in the Northwest Division on an 18 pole route to a Prison/H.S. Shelter in 2007, additional detailed information would be necessary in order to complete a thorough cost and benefit analysis. Therefore, in order to respond regarding the impact of this plan on Embarq, certain assumptions have been made. If additional details are provided regarding the plan, Embarq will review this response and provide a more targeted estimation of the costs and benefits.

The FPUC plan indicates that approximately 170 poles in their northwest division will be hardened in the years 2007 through 2009 in the proposed plan. For purposes of this response to the plan, Embarq has assumed that all of the approximately 170 poles targeted in those years in that division have Embarq attachments and that those 170 poles will be replaced. Thus, the estimated costs to Embarq in the first three years of this plan for pole replacements and transfer of attachments would be approximately \$289,000. Those costs would include Embarq's pro rata share of the cost of the new poles computed under the current pole attachment agreement between Embarq and FPUC as well as the cost to transfer Embarq's attachments to the new poles. If more detailed "street level" data such as street names and route schematics are provided these estimated dollars may be adjusted

FPUC's Hardening Plan may benefit Embarq by reducing the amount of damage to our facilities, thereby reducing the number of customer outages and reducing the time to restore service. The extent of these benefits will not be known until the next storm and they cannot be readily quantified in dollar savings; however, Embarq does not believe that it is likely these benefits will outweigh the costs.

Sincerely,

Sandra A. Khazraee

cc: Henry Bowlin, Embarq
Bill Radel, Embarq
Norman Horton

Sandra A. Khazraee
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