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Sent: Friday, February 01, 2008 4:29 PM
To: Filings@psc.state.fl.us
Cc: Susan Masterton
Subject: Docket: 070300-EI & 070304-EI, Embarq's Prehearing Statement
Attachments: 070300-EI & 070304-EI, Embarq's Prehearing Statement.doc

Filed on Behalf of: Susan S. Masterton
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Docket No. 070300-EI & 070304-EI

Title of filing: Embarq's Prehearing Statement

Filed on behalf of: Embarq Florida, Inc.

No of pages: 9

Description: Embarq's Prehearing Statement to be filed in above captioned dockets.

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February 1, 2008

ELECTRONIC FILING

Ms. Ann Cole
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

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.

Docket No. 070304-EI, Petition for rate increase by Florida Public Utilities Company

Dear Ms. Cole:

Attached for filing on behalf of Embarq Florida, Inc., is Embarq's Prehearing Statement in which we ask that you file in the above captioned dockets.

Copies have been served to the parties pursuant to the attached Certificate of Service. If you have any questions regarding this electronic filing, please do not hesitate to call me at (850) 599-1560.

Sincerely,

s/Susan S. Masterton
Susan S. Masterton

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DOCUMENT NUMBER-DATE

00863 FEB-1 8

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE
DOCKET NO. 070300-EI & 070304-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronically and by U.S. Mail on this 1st day of February, 2008 to the following: ERTIFICATE OF SERVICE

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s/Susan S. Masterton
Susan S. Masterton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Florida Public Utilities Company.

Docket No. 070300-EI

Docket No. 070304-EI

In re: Petition for rate increase by Florida Public Utilities Company.

Filed: February 1, 2008

EMBARQ'S PREHEARING STATEMENT

In accordance with Order No.07-0811-PCO-EI, issued October 8, 2007, Embarq Florida, Inc. ("Embarq") hereby files its Prehearing Statement.

A. Witnesses

Sandra A. Khazraee (Direct) Issues 1-13

Embarq reserves the right to supplement or revised this list as necessary to respond to Commission inquiries, to issues raised by Florida Public Utilities Company ("FPUC") or the Office of the Public Counsel ("OPC") in rebuttal testimony, or to address issues not designated that may be designated by the Prehearing Officer at the prehearing conference.

B. Exhibits

Exhibit SAK-1 Embarq's Cost Estimate

Embarq reserves the right to supplement or revise this list under the circumstances identified in Section A above. In addition, Embarq reserves the right to introduce exhibits at the hearing in accordance with applicable procedural rules.

C. Embarq's Statement of Basic Position

DOCUMENT NUMBER-DATE

00863 FEB-18

FLORIDA PUBLIC SERVICE COMMISSION

Embarq supports the stipulation of the Process to Engage Third-Party Attachers, which was filed jointly by the parties on January 29, 2008. Based on the information provided to Embarq by FPUC to date, and subject to the approval and implementation of the Process to Engage Third-Party Attachers, Embarq has no objection to FPUC's Plan as it is currently filed and as it is understood to affect Embarq.

Embarq intervened in this proceeding to address the issues relating to FPUC's Storm Hardening Plan and, therefore, takes no position at this time on Issues 14-144, relating to FPUC's request for a rate increase.

D. Embarq's Position on the Issues

STORM HARDENING AND RULE 25-6.0342, F.A.C.

ISSUE 1: Does the Company's Plan address the extent to which, at a minimum, the Plan complies with the National Electric Safety Code (ANSI C-2) [NESC] that is applicable pursuant to subsection 25-6.0342, F.A.C.? [Rule 25-6.0342(3)(a)]

POSITION: Embarq has no position at this time.

ISSUE 2: Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)1]

POSITION: Embarq has no position at this time.

ISSUE 3: Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]

POSITION: Embarq has no position at this time.

ISSUE 4: Does the Company's Plan reasonably address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities

serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational considerations? [Rule 256.0342(3)(b)3]

POSITION: Embarq has no position at this time.

ISSUE 5: Does the Company's Plan address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(c)]

POSITION: Embarq has no position at this time.

ISSUE 6: Does the Company's Plan address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance pursuant to Rule 25-6.0341, F.A.C? [Rule 25-6.0342(3)(d)]

POSITION: Embarq has no position at this time.

ISSUE 7: Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]

POSITION: Based on the information provided to Embarq by FPUC to date, and subject to the approval and implementation of the Process to Engage Third-Party Attachers, Embarq has no objection to FPUC's Plan as it is currently filed and as it is understood to affect Embarq.

ISSUE 8: Does the Company's Plan provide a detailed description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3. are to be made? [Rule 25-6.0342(4)(b)]

POSITION: Based on the information provided to Embarq by FPUC to date, and subject to the approval and implementation of the Process to Engage Third-Party

Attachers, Embarq has no objection to FPUC's Plan as it is currently filed and as it is understood to affect Embarq.

ISSUE 9: Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]

POSITION: Based on the information provided to Embarq by FPUC to date, and subject to the approval and implementation of the Process to Engage Third-Party Attachers, Embarq has no objection to FPUC's Plan as it is currently filed and as it is understood to affect Embarq.

ISSUE 10: Does the Company's Plan provide a reasonable estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]

POSITION: No position.

ISSUE 11: Does the Company's Plan provide an estimate of the costs and benefits, obtained pursuant to subsection (6) below, to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages realized by the third-party attachers? [Rule 25-6.0342(4)(e)]

POSITION: Based on the information provided to Embarq by FPUC to date, and subject to the approval and implementation of the Process to Engage Third-Party Attachers, Embarq has no objection to FPUC's Plan as it is currently filed and as it is understood to affect Embarq.

ISSUE 12: Does the Company's Plan include written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSI C-2)

that is applicable pursuant to Rule 25-6.034, F.A.C.? [Rule 25-6.0342(5)]

POSITION: The attachment agreement between Embarq and FPUC will continue to govern attachment standards and procedures for Embarq.

ISSUE 13: Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties? [Rule 25-6.0342(1) and (2)]

POSITION: Embarq has no position at this time.

Issues 14-144

POSITION: Embarq has no position at this time.

E. **STIPULATIONS:** Embarq has joined in the request for the Commission to approve the stipulation of the Process to Engage Third Party Attachers filed in this docket on January 29, 2008.

F. **PENDING MOTIONS:** Embarq has no Motions pending at this time.

G. **PENDING CONFIDENTIALITY REQUESTS:** Embarq has no Requests for Confidentiality pending at this time.

H. **OBJECTIONS WITNESSES QUALIFICATIONS:** Embarq has no objections to any witness's qualifications at this time.

I. **COMPLIANCE WITH ORDER ON PREHEARING PROCEDURE:** Embarq does not know of any requirement of the Order on Prehearing Procedure with which it cannot comply.

Respectfully submitted this 1st day of February, 2008.

s/Susan S. Masterton
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