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May 21, 2010

100265-EI

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

Dear Ms. Cole:

Attached are the original and fifteen copies of the revised Page 11 to Gulf Power Company's 2010-2012 Storm Hardening Plan filed on April 29, 2010 (Docket No. 100265-EI). Please replace Page 11 of the original filing with the attached revised Page 11.

The attached revision removes substation design criteria language from Section 2.3, Inspection Cycle of Transmission Structures. The substation design criteria language was appropriately included in Section 4.3, Substation on Page 21.

Sincerely,

*Susan D. Ritenour (uw)*

vm

enclosures

cc w/encl: Beggs & Lane  
Jeffrey A. Stone, Esq

CCM \_\_\_\_\_  
APA \_\_\_\_\_  
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Historically, Gulf has not inspected a set number of poles each year. Annual inspection rates have varied as the Company responded to its various needs. Gulf plans to utilize the same flexible approach in its proposed 2010-2012 Storm Hardening Plan to ensure the Company completes its inspection cycle as required.

Gulf Power currently inspects all of its substations at least once annually. These inspections include visual inspection of all structures, buss work, switches and capacitor banks for defects. Gulf proposes to continue the same inspection process for the 2010-2012 Storm Hardening Plan.

#### **2.4 Storm Hardening Activities for Transmission Structures**

Gulf feels that existing facilities should be governed by the version of the NESC in effect at the time of initial construction; however, to the extent practical and feasible, consideration should be given to upgrading when capital maintenance is performed on existing transmission facilities. It is Gulf's position that the adherence to current design and construction standards using generally accepted engineering practices, in conjunction with the recommended 6-year structure inspection program, will maintain adequate hardening of the system in all areas.

Gulf completed the replacement of 774 wood cross-arms and storm-guyed 700 structures at an annual cost estimated at \$600,000 as a part of the Company's 2007-2009 Storm Hardening Plan. Gulf does not breakout the component cost from the overall cost of the job.

Gulf plans to continue the following current activities for "existing" transmission facilities in the 2010-2012 Storm Hardening Plan:

1. Install storm guys on wood H-frame transmission structures not currently guyed.
2. Replace wooden H-frame cross-arms with steel cross-arms.

Gulf will perform an inventory of the transmission system during the 2010-2012 timeframe to obtain a more accurate count of remaining wood cross-arms to be replaced and H-frame structures to receive storm guys.

In addition, Gulf Power will continue the following best practices with respect to storm hardening for "new" transmission facilities in the 2010-2012 Storm Hardening Plan: