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MARSHALL WILLIS, DIRECTOR  
DIVISION OF ECONOMIC REGULATION  
(850) 413-6900

Public Service Commission

June 24, 2010

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10 JUN 25 AM 9:38  
COMMISSION  
CLERK

Ms. Susan D. Ritenour  
Gulf Power Company  
One Energy Florida  
Pensacola, FL 32520-0780

**Re: Docket No. 100265-EI, Gulf Power Company's updated 2010-2012 Storm Hardening Plan**

Dear Ms. Ritenour:

The staff is in the process of reviewing the company's updated 2010-2012 Storm Hardening Plan, and our review has generated some questions for which we ask that Gulf provide responses.

We ask that you please provide your responses to the attached data request by July 12, 2010. If there are any questions, please contact me at (850) 413-6980.

Sincerely,

Melissa L'Amoreaux  
Engineering Specialist  
Cost Analysis Section

ML:ML

Attachment

cc: Office of the General Counsel (Bennett)  
Office of Commission Clerk (Docket No. 100265-EI)

100-265-000-0504  
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For the following questions, please refer to the 2010-2012 Storm Hardening Plan filed May 3, 2010.

1. Gulf proposes to shorten its trim cycle for lateral lines to four years from the current six-year trim cycle. In addition, Gulf also proposes to reduce the emphasis on danger tree removal in residential areas.
  - a. Please clarify if this change will increase or decrease the total costs associated with storm hardening.
  - b. What is the estimated target for danger tree removal for each of the years 2010, 2011, and 2012?
  - c. What is the estimated cost for danger tree removal for each of the years 2010, 2011, and 2012?
  - d. Please clarify why customer acceptance towards danger tree removal has not been positive.
2. In section 2.3, Gulf states "Historically Gulf has not inspected a set number of poles each year." Please explain why Gulf does not project an annual number of poles to inspect.
3. Gulf states that an inventory process will take place during 2010-2012 in order to obtain a more accurate count of its transmission system.
  - a. Please explain how often this process takes place.
  - b. Please describe how this process will be conducted.
  - c. Please clarify why Gulf believes this process is necessary.
4. What evidence does Gulf have that its DistGIS system enhances reliability and service quality?
5. Please refer to page 13, section 2.6. During 2008, data collection and the transfer process were tested for forensic analysis. Please explain if there were any complications.
6. Please provide a description of the training procedures used for forensic collection.
7. Gulf states the total estimated costs for the 2010-2012 storm hardening plan is approximately \$108 million.
  - a. Please indicate the total costs for the 2007-2009 storm hardening plan.

- b. Please describe what accounts for any increases or decreases in cost for the 2010-2012 proposed storm hardening plan, such as proposed initiatives, changes in labor costs, etc.