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# Public Service Commission

June 13, 2016

Ms. Beth Keating  
Gunster Law Firm  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301

## STAFF'S FIRST DATA REQUEST

**Re: Docket No. 160106-EI - Petition for approval of 2016-2018 storm hardening plan, pursuant to Rule 25-6.0342, F.A.C., by Florida Public Utilities Company**

Dear Ms. Keating:

Please refer to Florida Public Utilities Company's (FPUC) 2016-2018 Storm Hardening Plan filed May 2, 2016.

1. Referring to page 3, Wood Pole Inspection Plan, when a failed pole is replaced, what type of pole (wood, concrete) is the replacement pole?
2. On page 4, Wood Pole Inspection Plan, FPUC reported that it performs all wood pole inspections and strength and loading assessments as contractors are used to perform below ground inspection of poles in concrete or asphalt areas.
  - a. Does FPUC use in-house employees for its wood pole inspections?
  - b. Please identify the contractors that perform the below ground inspection of poles in concrete or asphalt areas.
3. On page 6, Joint-Use Pole Attachment Audit, FPUC reported, "Although the agreements allow joint use attachments audits, these audits have not been completed as allowed in the contracts."
  - a. When was the last time a joint-use pole attachment audit was performed?
  - b. Is the data FPUC reports on page 6 from the last audit?
  - c. Why would FPUC not perform strength and loading assessment based upon the significant length of time since the last audit?

4. Referring to page 7, Inspection Cycle of Transmission Structures.
  - a. Please provide the actual number of inspections for transmission structures, by year, from 2013 through 2015, and the projected number of inspections, by year, from 2016 through 2018.
  - b. Are these inspections performed by in-house employees or a contractor?
  - c. If the inspections are performed by a contractor, please identify the contractor?
5. Referring to page 7, Storm Hardening Activities for Transmission Structures.
  - a. Does FPUC have an estimated number of wood transmission pole replacements for 2016, 2017, and 2018? If no, why not?
  - b. What is the estimated time until all wooden transmission structures will be replaced?
6. Referring to page 9, Outage Data for Overhead and Underground Systems.
  - a. Please explain how FPUC collects outage data for overhead and underground systems.
  - b. What format is used to store its outage data?
  - c. How does FPUC use its outage data to evaluate the reliability of its overhead and underground systems?
7. On page 9, Disaster Preparedness and Recovery Plans, FPUC reported that the information contained in the Emergency Procedures is updated on an annual basis. What were the updates to the Emergency Procedures in 2015 and 2016?
8. Referring to page 10, Compliance with NESC Overhead Requirements – Distribution.
  - a. Please describe in details how FPUC’s distribution facilities meet current NESC requirements.
  - b. Please describe in detail what specifications have been developed for future installations to meet the NESC EWL standards.
9. Referring to page 11, Transmission.
  - a. Please describe in detail how FPUC’s transmission facilities meet current NESC requirements.
  - b. Please describe in detail how the concrete poles, used for the replacement of wooden transmission poles, meet current NESC requirements.

10. Referring to page 11, Substation.

- a. Please describe in detail how FPUC’s substation facilities meet current NESC requirements.
- b. What work was completed to reduce the possibility of wind blown debris impacting the substation facilities?
- c. How many substation facilities had this work performed?
- d. What was the cost, per substation facility, to complete this work?
- e. How many more substation facilities will have this work performed?

11. Referring to page 11, Extreme Wind Loading for Distribution Facilities.

- a. Please provide an estimated start and completion date for the projects planned for 2016 through 2018.
- b. Please complete the table below describing all distribution feeder hardening projects. Please provide this information for the years 2007 through 2018.

	Total	Number Hardened	O&M Cost	Capital Cost	Total Cost
Project					
Project					

12. On page 13, Estimated Cost and Benefits, FPUC reported that because it has not experienced a major storm event since the implementation of its storm hardening, “the supporting data to develop an accurate benefit analysis for these programs is unavailable.” Please provide the original 2007 effect of FPUC’s electric infrastructure improvements on reducing storm restoration cost and customer outages analysis.
13. On page 13, Estimated Cost and Benefits, FPUC provided a list of items that “should have an impact on the reliability and restoration during storms.” Please explain the impact on reliability and restoration during storms each item listed provides FPUC’s system.
14. On page 14, Attachment Standards and Procedures, FPUC reported, “these contracts are being renegotiated.” When will the Joint-Use attachment contracts be finalized?

15. Referring to page 14, Soliciting Input from Third Party Attachers.

- a. When did FPUC provide the updated storm hardening plans to the eight third-party attachers that were listed?
- b. Did FPUC receive any comments back from the third-party attachers?
- c. If yes, please provide a summary of the comments received and any updates to FPUC's plan to address the concerns raised by the attachers.

16. Please provide a readable copy of the Joint-Use Attachment Specifications.

17. Please complete the table below.

Activity	Any change from current plan. (Y/N) *	Actual Cost									Estimated Cost								
		2013			2014			2015			2016			2017			2018		
		O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total
<b>8-Year Wooden Pole Inspection Program</b>																			
<b>10 Storm Hardening Initiatives</b>																			
1	A Three-Year Vegetation Management Cycle for Distribution Circuits																		
2	An Audit of Joint-Use Attachment Agreements																		
3	A Six-Year Transmission Structure Inspection program																		
4	Hardening of Existing Transmission Structures																		
5	Transmission and Distribution GIS																		
6	Post-Storm Data Collection and Forensic Analysis																		
7	Collection of Detailed Outage data Differentiating Between the Reliability Performance of Overhead and Underground Systems																		
8	Increased Utility Coordination with Local Governments																		
9	Collaborative Research on Effects of Hurricane Winds and Storm Surge																		
10	A Natural Disaster Preparedness and Recovery Program																		
<b>Totals</b>																			
<b>Any Other Key Elements or Proposed Initiatives</b>																			

\* Please explain any changes from the current plan.

Ms. Beth Keating

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Please submit your responses to the Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850, by July 13, 2016. If you have any questions or concerns, please contact me by phone (850) 413-6518 or by email at [pbuys@psc.state.fl.us](mailto:pbuys@psc.state.fl.us).

Sincerely,



Penelope D. Buys  
Engineering Specialist  
Division of Engineering

PDB:tj

cc: Office of Commission Clerk (Docket No. 160106-EI)