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## FPUC's Response to OPC's First Set of Interrogatories Nos. 1-6

Interrogatory No. 1

**INTERROGATORIES**

1. Please describe specifically how the Company measures the success of each approved storm protection program and project “to achieve the objectives of reducing restoration costs and outage times associated with extreme weather events and enhancing reliability.”

**Response:** FPUC objects to the extent that this information is contained in the SPP itself, which is being provided contemporaneously with these interrogatory responses. Notwithstanding and without waiving this objection, FPUC states that the programs included in the SPP considered many different variables when risk ranking the programs and associated projects that are intended to, as a whole, achieve the objectives of the SPP. As the SPP programs and projects are ramped up, the Company will monitor the various reliability indices to ensure they trend in a favorable direction. Additionally, the Company will use forensics assessment data to determine how the system is functioning during extreme weather events and compare costs incurred under the SPP to restoration costs prior to implementation of the SPP.

**Response:** Mark Cutshaw

Interrogatory No. 2(a)

2. Wood Pole Inspection Program, please respond to the following:

a. Provide details of pole inspection related to Storm Hardening Plan for years 2020, 2021, and 2022 including:

i. Number of Poles inspected;

**Response: 2020 – 4291 Poles; 2021 - 2825 Poles; 2022 – 3210 Poles  
(Estimated - Planned for Q3 and Q4 2022)**

ii. Number of poles failed;

**Response: 2020 – 283 Poles; 2021 – 109 Poles; 2022 – Unknown**

iii. Number of poles rehabilitated;

**Response: 2020 – 0 Poles; 2021 – 0 Poles; 2022 - Unknown**

iv. Cost to rehabilitate poles;

**Response: 2020 – \$0; 2021 – \$0; 2022 - Unknown**

i. Number of poles replaced;

**Response: 2020 – 130 Poles; 2021 – 169 Poles; 2022 – 178 (Planned)**

ii. Cost to replace poles; and

**Response: Average Value of \$6,000/Pole**

iii. Average cost per pole for inspection less replacement and rehabilitation costs. **Response: 2020 – \$37.21; 2021 – \$33.61; 2022 – Unknown**

**Response: Mark Cutshaw**

Interrogatory No. 2(b)

b. NESC Grade B pole replacement is required when the pole strength is at 75% of that required when installed (NESC Table 261-1).

i. Please confirm that FPUC is using the Grade C criteria of 66% of the remaining strength.

**Response:** FPUC meets or exceeds Grade B replacement criteria per Table 261-1 (Foot Note 3). Specifically, FPUC considers any wood pole, found during annual inspection, with less than or equal to 67% remaining strength as needing to be replaced. NESC Table 261-1 (Foot Note 3) states "Wood and reinforced structures shall be replaced or rehabilitated when deterioration reduces the structure strength to  $\frac{3}{4}$  of that required when installed." The Grade B strength factor per Table 261-1 for use with loads of Rules 250C (Extreme Wind) is .75 or 75%. Three fourths of 75% is 56.25%. Since FPUC replaces all poles with less than or equal to 67% strength remaining we are exceeding the NESC Rules.

ii. If using Grade C requirements, please explain why Grade B requirements are not appropriate.

**Response:** N/A

**Response:** Mark Cutshaw

Interrogatory No. 3

3. Regarding mitigation due to Storm Surges that are contained in the Storm Hardening Plan, please respond to the following:

- a. Provide the number of structures where the foundation and casing were upgraded, if any, as part of storm hardening plan in 2020, 2021, and 2022.

**Response: There have been no structures where the foundation and casing was upgraded during this time.**

- b. Provide the annual costs for any foundation and casing upgrades for 2020, 2021, and 2022.

**Response: N/A**

- c. Provide the number of structure(s) where additional supporting mechanisms (storm guys or pole bracing) for storm surge mitigation have been installed as part of storm hardening in 2020, 2021, and 2022.

**Response: There have been no additional supporting mechanisms added for storm hardening during this time.**

- d. Provide the annual costs for additional supporting mechanisms (storm guys or pole bracing) for storm surge mitigation for 2020, 2021, and 2022.

**Response: N/A**

- e. Provide the number of reinforced concrete pads with legs were installed as part of storm hardening in 2020, 2021, and 2022.

**Response: There have been no reinforced concrete pads with legs installed during this time.**

- f. Provide the annual costs for the concrete pads for 2020, 2021, and 2022.

**Response: N/A**

**Response: Mark Cutshaw**

Interrogatory No. 4

4. FPUC states in its 2020 Storm Hardening Plan and Storm Preparedness Initiatives that new underground facilities are designed to mitigate damage from storm surges and flooding. Please respond to the following:

- a. Are these measures included in the capital cost of the storm hardening plans?

**Response: FPUC's 2020 Storm Hardening Plan does include estimated budgeted costs for the projects contemplated thereunder. However, there is/was no cost recovery mechanism for Storm Hardening projects separate and apart from a rate case or similar rate making proceeding. The last such proceeding for FPUC was initiated in 2017 to include certain capital projects in its rate base and increase the Company's rates and charges by the amount necessary to recover the revenue requirement on those projects, which fell into three categories: (1) grid modernization and safety; (2) storm hardening; and (3) an interconnection with Florida Power & Light Company (FPL).**

- b. If so, explain how these costs separated from new underground construction to serve new customers.

**Response: Storm surges and flooding are primarily of concern in the Northeast Florida Division. Within the Storm Hardening Plan, addressing these issues called for a more substantial pad to be installed for use with pad mounted transformers. Should a new customer request underground service from a pad mounted transformer, the installation cost for the pad is the responsibility of the customer or contractor and not included in the Storm Hardening Plan cost.**

**Response: Mark Cutshaw**

Interrogatory No. 5

5. Vegetation Management – Distribution Program, please respond to the following:

- a. Provide average cost for trimming laterals on a per mile basis for 2020, 2021, and 2022.

**Response: 2020 – \$7,570/Mile; 2021 – \$12,519/Mile; 2022 – \$6,557/Mile (Estimated). Please note that FPUC does not separate Vegetation Management costs between mains and laterals**

- b. Provide average cost for trimming feeders on a per mile basis for 2020, 2021, and 2022.

**Response: See response to #5a above.**

- c. Confirm that outage restoration costs which include the cost of tree trimming crews are excluded from the Storm Hardening Program costs.

**Response: Tree trimming cost associated with outage restoration is included within the routine vegetation management program that is included in the FPUC Storm Hardening Plan. An exception to this would be when a “named” extreme weather event (i.e., hurricane) occurs and the vegetation management costs are included within the overall restoration costs associated with the named storm event.**

- i. If not, provide the annual costs for 2020, 2021, and 2022 for tree trimming/clearing related to power restoration.

**Response: N/A**

**Response: Mark Cutshaw**

Interrogatory No. 6

6. Overhead to Underground Projects for Distribution, please answer the following:
- a. Provide the number of undergrounding projects as part of storm hardening plan in 2020, 2021, and 2022.

**Response: There were no undergrounding projects performed.**

- b. Provide the annual expenditures for these undergrounding projects for 2020, 2021, and 2022.

**Response: N/A**

- c. Provide the criteria used to determine when a section of overhead line needs to be undergrounded.

**Response: Historically, as a result of safety concerns or when a significant number of outages and associated restoration times are caused by vegetation, salt spray corrosion, and/or inaccessible areas. Section 3.3 of the SPP details the criteria moving forward under the SPP.**

**Response: Mark Cutshaw**