

MOORE, WILLIAMS, BRYANT, PEEBLES & GAUTIER, P.A.

ATTORNEYS AT LAW  
806 EAST COLLEGE AVENUE  
POST OFFICE BOX 1169  
TALLAHASSEE, FLORIDA 32302

FILE COPY

W. T. MOORE, JR. (1896-1984)  
EDGAR M. MOORE  
Of Counsel  
TELEPHONE (904) 222-5511  
FACSIMILE (904) 941-2217

FREDERICK M. BRYANT  
RUSSELL D. GAUTIER  
SUSAN D. MICHAELS  
E. MURRAY MOORE, JR.  
WILLIAM J. PEEBLES  
F. PALMER WILLIAMS  
J. LEE WILLIAMS, JR.  
WILLIAM B. WILLINGHAM

September 9, 1993

Mr. Steve Tribble, Director  
Records and Reporting  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32301

RE: Docket No. 930486-EU  
Proposed Rule 25-6.0345, Safety

Dear Mr. Tribble:

Enclosed please find for filing an original and 15 copies of Florida Municipal Electric Association's Comments to Proposed Rule 25-6.0345 in reference to the above-mentioned docket.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in this matter.

Sincerely,

*Bill Willingham*  
William B. Willingham

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Enclosure  
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FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
09776 SEP-93  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL  
FILE COPY

In re: Amendment to Rule 25-  
6.0345, F.A.C., Safety Standards  
For Transmission And Distribution  
Facilities Constructed After 7/1/86.

Docket No. 930486-EU

**FLORIDA MUNICIPAL ELECTRIC ASSOCIATION'S  
COMMENTS TO PROPOSED RULE 25-6.0345, SAFETY**

These comments are filed on behalf of the Florida Municipal Electric Association (FMEA), an association representing thirty-two of Florida's municipally-owned electric systems. FMEA is not opposed to reporting work order information that Staff requires to prescribe and enforce safety standards for transmission and distribution facilities. However, FMEA believes that several of the reporting requirements that proposed Rule 25-6.0345(2) creates are unnecessary. In addition, FMEA believes that a utility should be allotted at least sixty days to prepare and file its quarterly report, as opposed to the fifteen days allotted in the proposed rule.

**Information Required**

Proposed Rule 25-6.0345(2) requires every electric utility to report work order information, apparently to provide Staff with sufficient information to determine which facilities they should inspect. FMEA is willing to assist Staff in this task, however, FMEA believes the Commission should require utilities to report only the information that is necessary to perform this task. The proposed rule will require utilities to report the work order number, a brief title, the estimated cost, location, Kv rating, and contiguous work orders. FMEA believes that only the work order number, a brief title, and possibly a cost estimate should be required.

DOCUMENT NUMBER-DATE

09776 SEP-98

FPSC-RECORDS/REPORTING

Obviously certain information is required for Staff to determine which facilities or jobs should be inspected, however, FMEA requests that Staff only require the information that is necessary to determine which jobs to inspect. FMEA does not dispute that the work order and a brief description of the job are essential reporting requirements. However, with the possible exception of cost, all of the other reporting requirements appear to be unnecessary and pointless. Apparently, Staff needs to be aware of every work order that has been completed in the previous quarter, and approximately what work was involved in completing each work order. FMEA believes that this information can be obtained from the work order and the description reporting requirements. However, if the description is not adequate, it also may be necessary to include a reporting requirement such as cost, rounded to the nearest \$1,000, to provide additional information regarding the size and nature of the work order. FMEA is not opposed to reporting such information if it is essential to Staff's review.

With the exception of the work order number, a brief title, and possibly the cost (or some other measure), FMEA believes that any other reporting requirements are unnecessary for municipally-owned utilities, and will be unduly burdensome. Clearly, municipally-owned utilities should not be required to report location because the work order will be located within close proximity of the City and therefore the general location is known. If a precise location is required for a field inspection, Staff can obtain a print of the work order from the utility, which is the current policy. In addition, Staff can obtain other information at the time the print is requested. FMEA will not object to any reasonable data request from Staff once a job order has been selected for field

inspection, but we object to gathering and reporting information that most likely will not be used.

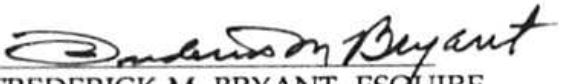
### **Report Deadline**

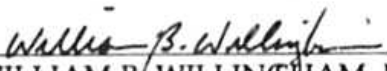
FMEA also objects to the fifteen day filing deadline that proposed Rule 25-6.0345(2) creates. FMEA believes that municipally-owned utilities should be permitted at least sixty days to gather and report work order information. Several utilities presently do not have automated work order tracking systems that can produce the required report. It will be costly for some utilities to implement such a tracking system, especially if the program's only function is to meet the fifteen day deadline. In addition, FMEA is not aware of any time constraints upon the Commission to inspect jobs within specified time periods, and we believe a fifteen day criteria is unnecessary.

WHEREFORE, FMEA respectfully requests a hearing to resolve its concerns with proposed Rule 25-6.0345(2). However, if the reporting deadline is extended to sixty days, and the word "hundred" in subsection (c) is replaced with the word "thousand," and subsections (d), (e) and (f) are deleted from proposed subsection 25-6.0345(2), FMEA will forego its right to request a hearing.

RESPECTFULLY SUBMITTED this 9<sup>th</sup> day of September, 1993.

FLORIDA MUNICIPAL ELECTRIC  
ASSOCIATION

  
FREDERICK M. BRYANT, ESQUIRE

  
WILLIAM B. WILLINGHAM, ESQUIRE  
Moore, Williams, Bryant,  
Peebles & Gautier, P.A.  
Post Office Box 1169  
Tallahassee, Florida 32302  
904/222-5510

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