



Florida Electric Cooperatives Association

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FILED

Steve Tribble, Director
Division of Records & Reporting
Florida Public Service Commission
101 E. Gaines Street
Tallahassee, FL 32399

RE: Docket No. 930486-EU

Dear Mr. Tribble:

Please find enclosed the original and 15 copies of Florida Electric Cooperatives Association's comments on proposed changes to Rule 25-6.0345, F.A.C. to be filed in the above referenced docket.

Thank you for your assistance.

Sincerely,

Michelle L. Hershel
Director of Regulatory Services

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Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Amendment to Rule) Docket 930486-EU
25-6.0345, F.A.C., Safety)
Standards for Transmission and)
Distribution Facilities Constructed)
After 7/1/86)

COMMENTS BY THE FLORIDA ELECTRIC
COOPERATIVES ASSOCIATION

On behalf of the 16 electric distribution cooperatives and Seminole Electric Cooperative, Inc. and Alabama Electric Cooperative, Inc., the Florida Electric Cooperatives Association (FECA) offers the following comments on the proposed changes to Rule 25-6.0345, F.A.C. regarding Safety Standards for transmission and distribution facilities constructed after July 1, 1986:

FECA's comments address paragraphs (2) & (3) of the proposed rule. Specifically, we suggest the following changes to paragraph (2):

(2) Each public electric utility, rural electric cooperative and municipal electric utility shall report all completed electric work orders, whether completed by the utility or one of its contractors, at the end of each quarter of the year. The report shall be filed with the Director of the Commission's Division of Electric and Gas no later than the ~~15th~~ 60th working day after the last day of the reporting quarter, and shall contain, at a minimum, ~~the following information~~ the work order number.

- ~~(a) work order number/project/job;~~
- ~~(b) brief title;~~
- ~~(c) estimated cost in dollars, rounded to nearest hundred;~~
- ~~(d) location;~~
- ~~(e) Kv rating (if below 1 Kv, enter zero);~~
- ~~(f) contiguous work order in one location (y/n).~~

To avoid unnecessary time constraints, the filing date should be changed from 15 days to 60 days. Due to the time required to close out jobs, the paperwork cannot be completed, and the information made available to staff within 15 days. In addition,

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the cooperatives have other reporting requirements to the Rural Electrification Administration (REA) which must be completed at the same time.

The list of information for each work order should be changed to include only, "the work order" number. Items (b) - (f) should be eliminated because they are either unnecessary, or unavailable. The current inspection system works as follows: A list of completed work order numbers is sent to the PSC each quarter. Staff selects a random sample of these work order numbers to inspect and forwards this list to the cooperative. Engineering personnel of the cooperative provides a copy of the requested work order and a map for driving directions to each job site. The PSC inspector takes this information and inspects each job.

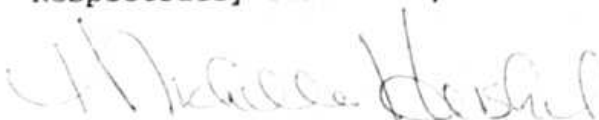
This system appears to work well and at the same time keeps reporting requirements to a minimum. The inclusion of items (b) - (f) simply increase reporting requirements which in turn increase the workload and costs to the cooperatives, but does nothing to enhance the enforcement of safety standards. Simply put, the safety inspection process is not broken so it does not need to be fixed. In addition, this information is not available in many cases or may be available but in different areas of the cooperative.

Paragraph (3) of the proposed rule requires utilities to report their information using a required format. Electric cooperatives file inspection reports with REA which may contain the information staff is requesting, if so, it would be unnecessary and redundant to require the cooperative to redo the report according

to staff's required format. These additional requirements will only increase costs to the cooperatives. The cooperatives would be willing to provide the Commission with readily available information for the PSC staff to put into their own format.

FECA requests that the above changes and comments be incorporated into the proposed rule, if this cannot be done, FECA requests a hearing be held at the designated time and date, 9:30 a.m. on September 20, 1993.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Michelle L. Hershel".

Michelle L. Hershel
Director of Regulatory Services