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COMMISSION
CLERK

-M-E-M-O-R-A-N-D-U-M-

DATE: August 17, 2006

TO: Director, Division of the Commission Clerk & Administrative Services (Bayó)

FROM: Division of Economic Regulation (Swearingen, Breman, Matlock, McNulty) *T.S. sum WBM RLT Tgd*
Office of the General Counsel (Gervasi, Helton) *PSM*

RE: Docket No. 060531-EU – Review of all electric utility wooden pole inspection programs.

AGENDA: 08/29/06 – Regular Agenda – Proposed Agency Action – Interested Persons May Participate

COMMISSIONERS ASSIGNED: All Commissioners

PREHEARING OFFICER: Administrative

CRITICAL DATES: None

SPECIAL INSTRUCTIONS: None

FILE NAME AND LOCATION: S:\PSC\ECR\WP\060531.RCM.DOC

Case Background

On February 27, 2006, the Commission issued Order No. PSC-06-0144-PAA-EI in Docket No. 060078-EI, In Re: Proposal to Require Investor-Owned Electric Utilities to Implement a Ten-Year Wood Pole Inspection Program, requiring each electric investor-owned utility (IOU) to implement an eight-year wood pole inspection cycle and submit annual reports. As noted in the Order, the impacts of the intense hurricane seasons of 2004-2005 on electric distribution facilities and the prediction of ongoing above-average storm activity compelled the Commission to assess the current wood pole inspection practices of the electric IOUs.

More specifically, in Order No. PSC-06-0144-PAA-EI, the Commission found it appropriate to require each electric IOU to:

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

- 1) Implement an eight-year wood pole inspection program utilizing the sound and bore technique for all wood poles.
- 2) Include excavation of all Southern Pine poles and other pole types as appropriate per Rural Utilities Service (RUS) Bulletin 1730B-121.
- 3) Perform strength impact assessments on poles with additional third party attachments.
- 4) File annual pole inspection reports with the Division of Economic Regulation by March 1 of each year.

In addition, the Commission required each electric IOU to submit a comprehensive wood pole inspection plan to the Director of the Division of Economic Regulation by April 1, 2006. In its filings, each electric IOU was required to include its plan for pole specific data gathering, pole inspection program enforcement, and collocated poles inspections (how poles shared by two or more companies will be inspected). Each electric IOU was further required to identify any pole inspection standards utilized by the electric IOU that exceed the minimum requirements of the National Electrical Safety Code (NESC) and any other details necessary to understand its pole inspection program. The Commission provided for utility specific flexibility. The Order states that "to the extent any IOU's plan deviates in any material respect from the requirements of this order, staff is directed to present its recommendation regarding the plan to the Commission for further consideration in light of the utility's specific circumstances."

On April 1, 2006, each electric IOU filed plans of their eight-year wood pole inspection program with the Commission. Staff reviewed the plans, developed a tabular summary of the plans, and provided the summary to each electric IOU and requested corrections by May 26, 2006. On June 27, 2006, staff had a follow-up meeting with the electric IOU's to discuss portions of the plans that appeared to deviate from the Order's requirements. Staff presented an opportunity for the electric IOUs to clarify and support those portions of the plans that appeared to deviate from the Order's requirements. The electric IOUs were given a response date of July 13, 2006 to submit data to support apparent non-compliance items and the utilities responded accordingly.

On August 3, 2006, staff opened the current docket to address material deviations from the requirements of the Order. Staff believes there are material deviations in each of the electric IOU's wood pole inspection plans. The purpose of this recommendation is to apprise the Commission of these deviations and to propose a regulatory response to the deviations.

The Commission also issued Order No. PSC-06-0168-PAA-TL in Docket No. 060077-TL, In Re: Proposal to Require Local Exchange Telecommunications Companies to Implement a Ten-Year Wood Pole Inspection Program, on March 1, 2006, requiring each local exchange company to implement an eight-year wood pole inspection cycle and submit annual reports. As a result of a protest filed by Verizon, Order No. PSC-06-0677-FOF-TL was issued on August 7, 2006, which allowed a deviation to the requirements of Order PSC-06-0168-PAA-TL. The deviation allowed Verizon to use a new technology, Resistograph, on an experimental basis as a substitute for the wood boring method and the excavation method.

Also at the February 7, 2006, Agenda Conference, the Commission directed staff to pursue discussions with the municipal electric utilities and the rural electric utilities about

Docket No. 060531-EU

Date: August 17, 2006

voluntary adoption of the inspection requirements which applied to the electric IOUs per Order No. PSC-06-0144-PAA-EI. Staff conducted a meeting with the municipal electric utilities, represented by the Florida Municipal Electric Association (FMEA), and the electric cooperative utilities, represented by the Florida Electric Cooperatives Association (FECA) and including Lee County Electric Cooperative, on March 7, 2006. At the meeting, staff requested each utility's voluntary compliance plan by May 1, 2006. The utilities provided such plans and staff corresponded on May 11, 2006, with the utilities to further clarify the plans that were submitted. The utilities responded accordingly with additional information as requested.

Section 366.04(5), Florida Statutes, gives the Commission the jurisdiction over the planning, development, and maintenance of a coordinated electric power grid throughout Florida to assure an adequate and reliable source of energy for operational and emergency purposes in Florida. In addition, the Commission has the power to require repairs and improvements to the plant and equipment of any public utility when reasonably necessary to promote the convenience and welfare of the public and secure adequate service or facilities for those reasonably entitled thereto. Section 366.05(1), Florida Statutes. The Commission has exclusive jurisdiction to prescribe and enforce safety standards for transmission and distribution facilities of all investor owned, cooperative, and municipal electric utilities, and adopts the NESC as its standards. Section 366.04(6), Florida Statutes, and Rule 25- 6.0345, Florida Administrative Code. The Commission may require reports from all electric utilities to assure the development of adequate and reliable electric grids. Section 366.05(7), Florida Statutes.

Discussion of Issues

Issue 1: Are each of the electric IOU's plans for an eight-year wood pole inspection program in compliance with the requirements of Order No. PSC-06-0144-PAA-EI?

Recommendation: Each electric IOU has filed wood pole inspection plans which are compliant with the requirements of Order No. PSC-06-0144-PAA-EI for most of its wooden poles. However, each electric IOU's proposed wood pole inspection plan includes one or more deviations from the requirements of the Order for some of their wood poles. Each electric IOU should be required to file in this docket additional data that supports their deviation(s) from Order No. PSC-06-0144-PAA-EI within 30 days after the Final Order. Staff will review the filings and issue a recommendation to the Commission at a subsequent Agenda Conference addressing unresolved compliance matters. (Swearingen)

Staff Analysis: Staff's review of each electric IOU's level of compliance with the Order is provided below and in summary form in Attachment A. The focus of this compliance review is the following six requirements of the Order:

- | | |
|-----------------|--|
| Requirement (1) | Eight-year wood pole inspection program using the sound and bore technique; |
| Requirement (2) | Excavate all Southern Pine poles and other pole types as appropriate per RUS Bulletin 1730B-121; |
| Requirement (3) | Perform strength impact assessment on all wood poles with additional third party attachments; |
| Requirement (4) | A plan for inspection of poles with collocated facilities; |
| Requirement (5) | A plan for inspection program enforcement; and |
| Requirement (6) | A plan for gathering pole-specific data. |

Staff believes each electric IOU has filed plans that are compliant with Requirements 1, 3, 4, 5 and 6 of the Order that are listed above. However, staff has noted the following deviations from Requirement 2 of the Order as follows:

- No excavation of poles surrounded by concrete or pavement (All)
- No excavation of transmission poles except when warranted by sounding (FPL)
- No excavation of CCA poles under 15 years old (Gulf)
- No excavation of CCA poles under 20 years old (TECO)
- No excavation of CCA poles under 11 years old (FPUC)

The following section is staff's assessment of each electric IOU's plan to address the Order requirements listed above.

(1) Eight-Year Wood Pole Inspection Program Using the Sound and Bore Technique

Order Requirement

In Order No. PSC-06-0144-PAA-EI, the Commission required that each electric IOU implement an inspection program of its transmission and distribution wood poles based on the requirements of the NESC and an eight-year inspection cycle for all wood poles. Furthermore, the Commission required that all wood pole inspections be based on the sound and bore technique.

Compliance

Each electric IOU proposes an eight-year wood pole inspection program using the sound and bore technique for the inspection as outlined in RUS Bulletin 1730B-121 Section 4.2. This is consistent with the requirement of the Order.

(2) Excavate All Southern Pine and Other Pole Types as Appropriate per RUS Bulletin 1730B-121

Order Requirement

In Order No. PSC-06-0144-PAA-EI, the Commission required the excavation for all Southern Pine poles and other pole types as appropriate, in accordance with the RUS for Florida's rural electric utilities. The RUS Bulletin 1730B-121 Section 4.3, states that "the effectiveness of the sound and bore inspection is greatly increased when excavation is added to the process. Excavation exposes the most susceptible section of the pole for inspection. For southern yellow pine this is particularly true, since decay begins externally and below ground." RUS Bulletin 1730B-121 also places the state of Florida in its highest decay severity zone.

Compliance

All of the electric IOUs plans deviate from the Order in that they do not include excavation of wood poles surrounded by concrete, pavement or obstructions. The utilities have not provided data supporting the exclusion of these poles from excavation nor provided alternative inspection methods that will reasonably ensure the safety and reliability of these poles.

FPL's plan deviates from the Order in that it does not include excavation of transmission poles except as warranted by sounding. FPL states that back-fill material and compaction are key components for transmission structural performance. FPL limits the amount of locations where disturbance of existing soil compaction occurs by only requiring if warranted by sounding. Staff is concerned that deterioration of transmission poles below ground line may go undetected.

Gulf's plan deviates from the Order in that it does not include excavation of CCA poles under 15 years old. Gulf provided summary data to support its proposal. Staff reviewed the data and agrees with Gulf that the initial data appears on its face to support alternative, less rigorous

inspection methods for such poles for this utility. However, Gulf did not provide a comprehensive description of the data, methodology, and the results, so staff believes a more thorough review is warranted. Gulf plans to continue to incorporate a sample of CCA poles under 15 years old in its proposed inspection plan for excavation to insure on-going statistical validity of its data.

TECO's plan deviates from the Order in that it does not include excavation of CCA poles under 20 years old. TECO provided data for 2004 and 2005 to support its proposal. However, TECO agreed with staff that the data was not statistically conclusive for purposes of establishing this criteria. TECO agreed to perform full inspections on all poles, including CCA poles under 20 years old, during the 2006 inspection cycle and file this data with its annual inspection report due on March 1, 2007.

FPUC's plan deviates from the Order in that it does not include excavation of CCA poles under 11 years old. FPUC did not submit any data to support the exclusion of CCA poles under 11 years old from excavation.

Alternative methods to excavation have been approved on an experimental basis by the Commission for telecommunication companies. In Order No. PSC-06-0168-PAA-TL, issued March 1, 2006, in Docket No. 060077-TL, In Re: Proposal to Require Local Exchange Telecommunications Companies to Implement a Ten-Year Wood Pole Inspection Program, the Commission required telecommunication companies to perform pole inspections using sound, bore, and excavation techniques in accordance with RUS guidelines. Excavation from the ground line to a depth of 18 inches is recommended by the RUS in order to detect excessive deterioration in that portion of the pole. Verizon protested the order, and submitted a proposal to use a new technology known as Resistograph in place of the traditional boring and excavation method. Verizon learned about the Resistograph technology from the Division of Competitive Markets and Enforcement CMP Staff and decided to propose it to the Commission as an alternative to boring and excavation on an experimental basis. Verizon claimed the Resistograph was superior to traditional boring for various reasons, including reduced impact on the pole itself due to smaller boring diameter, as well as the ability to detect subsurface deterioration with low impact and low cost for poles which are not easily excavated, such as those surrounded by cement, pavement, or other obstructions. The Commission approved Staff's recommendation to allow the Resistograph technology to be used on an experimental basis in Order No. PSC-06-0677-FOF-TL issued August 7, 2006. The Resistograph is an example of one alternative available to electric IOUs which may be proposed rather than simply choosing to not perform any type of subsurface inspection for certain types of poles such as CCA poles under a specified age, transmission poles, or poles surrounded by cement, pavement or other obstructions.

- (3) Perform strength impact assessment on all wood poles with additional third party attachments

Order Requirement

In Order No. PSC-06-0144-PAA-EI, the Commission required that a strength impact assessment be performed on all wood poles with additional third party attachments to determine whether the IOU has complied with the NESC requirements for pole strength.

Compliance

Each electric IOU's inspection plan requires that strength impact assessments be performed on all wood poles with additional third party attachments. The strength assessment is based on a comparison of the remaining strength versus the original strength of the pole to ensure the pole meets or exceeds NESC requirement. This is consistent with the requirement of the Order.

(4) Plan for Inspection of Poles with Collocated Facilities

Order Requirement

In Order No. PSC-06-0144-PAA-EI, the Commission required that each plan include a procedure to ensure the inspection of collocated poles.

Compliance

Each electric IOU has included in its plan a procedure to ensure the inspection of collocated poles. This is accomplished by performing their own inspection on the pole and sharing data with the pole owner or incorporating the inspection into the joint-use agreement with the third party pole owner. This is consistent with the requirement of the Order.

(5) Plan for Inspection Program Enforcement

Order Requirement

In Order No. PSC-06-0144-PAA-EI, the Commission required that each plan include a procedure to ensure program enforcement.

Compliance

Each electric IOU has included in its plan a procedure to ensure enforcement of the inspection program. This is accomplished through vendor audits and/or the utility's quality control programs. This is consistent with the requirement of the Order.

(6) Plan for Gathering Pole-Specific Data

Order Requirement

In Order No. PSC-06-0144-PAA-EI, the Commission required that each plan include a procedure for pole-specific data gathering.

Compliance

Each electric IOU has included in its plan a procedure to gather pole-specific data through a Geographic Information System (GIS) or an information data base. This is consistent with the requirements of the Order.

Docket No. 060531-EU

Date: August 17, 2006

Conclusion

Staff believes that each electric IOU has filed wood pole inspection plans which are compliant with the requirements of Order No. PSC-06-0144-PAA-EI for most of its wooden poles owned by the utilities. However, each electric IOU's proposed wood pole inspection plan includes one or more deviations from the wood pole excavation requirements of the Order for some of their wood poles. Each electric IOU should be required to file in this docket additional data that supports their deviation(s) from Order No. PSC-06-0144-PAA-EI within 30 days after the Final Order. Staff will review the filings and issue a recommendation to the Commission at a subsequent Agenda Conference addressing unresolved compliance matters.

Issue 2: What additional information does the Commission need to be able to assess each municipal and cooperative electric utility's wood pole inspection plan?

Recommendation: Each municipal electric utility and each cooperative electric utility has provided information regarding their respective wood pole inspection plans similar to the information required of the electric IOU's plans filed in response to Order No. PSC-PSC-06-0144-PAA-EI. Many of the municipal and cooperative electric utilities' plans appear to deviate from the inspection requirements imposed on the electric IOUs. The Commission should direct staff to solicit a report from each municipal and cooperative electric utility justifying apparent deviations to the Commission by September 28, 2006. (Matlock)

Staff Analysis: Staff's assessment of the electric municipal utilities' and the electric cooperative utilities' plans to adequately ensure the safety and reliability of its wood poles is summarized in Table 1 below. A more detailed presentation per utility is in Attachments B and C.

Table 1 – Municipal and Cooperative Voluntary Compliance with the Order

Requirement Number	Requirement	Municipal Utilities (34 Total)		Cooperative Utilities (18 Total)	
		Compliant	Non-Compliant	Compliant	Non-Compliant
1	Sound and Bore, 8 Year Cycle, All Poles	5	29	6	12
2	Excavation of All Poles	6	28	10	8
3	All Poles With Attachments Assessed for Strength	2	32	11	7
4	Provide Plan re: How Shared Poles Will Be Inspected	17 *	5	7	11
5	Provide Plan re: How Inspection Plan Will Be Enforced	34	0	18	0
6	Provide Plan re: How Pole Specific Data Will Be Retained	34	0	16	2

* Note: Twelve municipals have no shared poles.

Conclusion

Each municipal electric utility and each cooperative electric utility provided information regarding their respective wood pole inspection plans similar to the information required of the investor owned electric utilities' plans filed in response to Order No. PSC-PSC-06-0144-PAA-EI. Staff believes many of the municipal and cooperative electric utilities' plans appear to deviate from the inspection requirements imposed on the electric IOUs. The Commission should

Docket No. 060531-EU

Date: August 17, 2006

direct staff to solicit a report from each municipal and cooperative electric utility justifying apparent deviations to the Commission by September 28, 2006. These requirements include an eight-year cycle using the sound and bore technique, with excavation, and strength assessments for third party attachments. The justification should address the safety and reliability aspects of all wood poles owned by the utility for the purpose of reducing storm related customer service interruptions and restoration times. The Commission should also direct staff to incorporate an assessment of municipal and cooperative electric utilities' pole inspection practices in the Commission's review to the Governor, President of the Senate, and Speaker of the House of Representatives. This review, due July 1, 2007, pertains to reliability enhancements to Florida's transmission and distribution grids as required by Senate Bill 888 (enrolled).

Docket No. 060531-EU

Date: August 17, 2006

Issue 3: Should this docket be closed?

Recommendation: No. If no person whose substantial interests are affected by the proposed agency action files a protest within twenty-one days of the issuance of the order, a consummating order will be issued. If the Commission approves staff's recommendation in Issues 1 and 2, the docket should remain open for the electric IOUs, municipals and cooperatives to submit additional data to support the deviations. (Gervasi)

Staff Analysis: If no person whose substantial interests are affected by the proposed agency action files a protest within twenty-one days of the issuance of the order, a consummating order will be issued. If the Commission approves staff's recommendation in Issues 1 and 2, the docket should remain open for the electric IOUs, municipals and cooperatives to submit additional data to support the deviations.

INVESTOR-OWNED ELECTRIC UTILITIES – WOODEN POLE INSPECTION PROGRAMS							
Utility	Approx. No. of Customers	Requirements of Order No. PSC-06-0144-PAA-EI					
		Inspection method, cycle, pole selection:	Excavation requirement:	Attachment strength impact assessment:	Collocated facilities inspections:	Inspection program Enforcement:	Data Gathering:
		1. Sound and Bore, 2. 8 Year Cycle, 3. All Distribution and Transmission Wood Poles	Excavation of All Southern Pine, Other pole Types, per RUS Guidelines	All Poles With Attachments Assessed for Strength	Provide Plan re: How Shared Poles Will Be Inspected	Provide Plan re: How Inspection Plan Will Be Enforced	Provide Plan re: How Pole Specific Data Will Be Retained
FPL	4,306,199	<u>Distribution</u> 1. Sound and bore 2. 8 years 3. All poles <u>Transmission</u> 1. Sound and bore 2. 6 years 3. Poles passing visual and sounding tests will not be bored	<u>Distribution</u> Yes, will excavation to 18 inches. <u>Transmission</u> Excavation if warranted by sounding. Plan does not distinguish between Southern Pine and other types of wood.	Yes.	Yes, but little detail provided. Will share data and coordinate with other utilities.	Yes. Vendor audits, plus FPL random samples.	Yes. Use inspections to populate main GIS.
PEF	1,579,806	<u>Distribution / Transmission</u> 1. Sound and bore 2. 8 years 3. All poles	<u>Distribution / Transmission</u> Yes, excavation to 18 inches. Plan does not distinguish between Southern Pine and other types of wood.	Yes.	Yes, PEF will inspect poles and provide data to pole owner.	Yes.	Yes.
TECO	646,735	<u>Distribution / Transmission</u> 1. Sound and bore 2. 8 years 3. All poles except for CCA poles under 20 years old unless warranted by sounding..	<u>Distribution / Transmission</u> Yes - for non-CCA poles and CCA poles over 19 years old. No - for CCA poles under 20 years old. Plan does not distinguish between Southern Pine and other types of wood.	Yes	Yes, they will share data requested by 3 rd parties.	Yes	Yes

INVESTOR-OWNED ELECTRIC UTILITIES – WOODEN POLE INSPECTION PROGRAMS							
Utility	Approx. No. of Customers	Requirements of Order No. PSC-06-0144-PAA-EI					
		Inspection method, cycle, pole selection:	Excavation requirement:	Attachment strength impact assessment:	Collocated facilities inspections:	Inspection program Enforcement:	Data Gathering:
		1. Sound and Bore, 2. 8 Year Cycle, 3. All Distribution and Transmission Wood Poles	Excavation of All Southern Pine, Other pole Types, per RUS Guidelines	All Poles With Attachments Assessed for Strength	Provide Plan re: How Shared Poles Will Be Inspected	Provide Plan re: How Inspection Plan Will Be Enforced	Provide Plan re: How Pole Specific Data Will Be Retained
Gulf	408,641	<u>Distribution</u> 1. Sound and bore 2. 8 years 3. All poles except CCA poles under 15 years old. Selective boring for CCA poles <u>Transmission</u> 1. Sound and bore 2. 6 years 3. All poles except CCA poles unless warranted by sounding. Selective boring for CCA poles	<u>Distribution / Transmission</u> Yes - for non-CCA poles. No - for CCA poles under 15 years old. Plan does not distinguish between Southern Pine and other types of wood.	Yes	Yes, they will work closely with 3 rd parties.	Yes. Contractors have this requirement and Gulf will evaluate contractors' work. Gulf will also sample CCA poles for excavation.	Yes. Data recording procedures are covered in the contract.
FPUC	27,393	<u>Distribution / Transmission</u> 1. Sound and bore 2. 8 years 3. All poles	<u>Distribution / Transmission</u> Yes - for non-CCA poles ands CCA poles over 10 years old. No - for CCA poles under 11 years old. Plan does not distinguish between Southern Pine and other types of wood.	Yes.	Yes, they will work closely with 3 rd parties.	Yes. Contractors have this requirement and FPUC will evaluate contractors' work.	Yes.

MUNICIPAL ELECTRIC UTILITIES – WOODEN POLE INSPECTION PROGRAMS							
Utility	Approx. No. of Customers	Requirements of Order No. PSC-06-0144-PAA-EI					
		Inspection method, cycle, pole selection:	Excavation requirement:	Attachment strength impact assessment:	Collocated facilities inspections:	Inspection program Enforcement:	Data Gathering:
		1. Sound and Bore, 2. 8 Year Cycle, 3. All Distribution and Transmission Wood Poles	Excavation of All Southern Pine, Other pole Types, per RUS Guidelines	All Poles With Attachments Assessed for Strength	Provide Plan re: How Shared Poles Will Be Inspected	Provide Plan re: How Inspection Plan Will Be Enforced	Provide Plan re: How Pole Specific Data Will Be Retained
JEA	387,685	1. Sound & Bore 2. 8 year cycle 3. Visual only on CCA poles.	Yes, if inspection indicates potential problem.	Yes, as part of Sound & Bore process.	Yes, requesting quality control from others.	Yes, conducts quality control checks bi-weekly.	Yes, using GIS data base.
Orlando Utilities Commission	194,081	1. Sound & Bore 2. 8 year cycle 3. Sound & Spike performed on transmission poles.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Not applicable. No shared poles.	Yes, Contractor reports regularly.	Yes, using GIS data base.
Lakeland Electric	120,000	1. Visual 2. 8 year cycle 3. All poles	Yes	No, original design to NESC.	Yes	Inspectors will file regular reports.	Yes, using GIS data base.
Tallahassee, City of	109,000	1. Sound & Bore 2. 8 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	Yes, performed by contractor.	Yes, inspecting some, requesting quality control from owner.	Yes, Contractor reports monthly.	Yes, using GIS data base.
Gainesville Regional Utilities	87,700	1. Sound & Bore 2. 8 year cycle 3. Poles with birth mark under 10 years not inspected.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes.	Yes, conducts quality control checks.	Yes, using GIS data base.
Kissimmee Utility Authority	62,000	1. Sound & Spike 2. 8 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	No, only performed when deemed necessary for new attachments.	Yes.	Inspectors will file regular reports.	Yes, using GIS data base.
Ocala Electric Utility	48,300	1. Visual (Negotiating with Osrose to implement program.) 2. No data 3. All poles	Yes	No, original design to NESC.	Not applicable. No shared poles	Inspectors will file regular reports.	Yes, using GIS data base.
Vero Beach, City of	32,500	1. Sound & Spike 2. 5 year cycle	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes.	Inspectors will file regular reports.	Yes, will be in place by June

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Utility	Approx. No. of Customers	Requirements of Order No. PSC-06-0144-PAA-EI					
		Inspection method, cycle, pole selection:	Excavation requirement:	Attachment strength impact assessment:	Collocated facilities inspections:	Inspection program Enforcement:	Data Gathering:
		1. Sound and Bore, 2. 8 Year Cycle, 3. All Distribution and Transmission Wood Poles	Excavation of All Southern Pine, Other pole Types, per RUS Guidelines	All Poles With Attachments Assessed for Strength	Provide Plan re: How Shared Poles Will Be Inspected	Provide Plan re: How Inspection Plan Will Be Enforced	Provide Plan re: How Pole Specific Data Will Be Retained
		3. All poles.					2006.
Beaches Energy Services	32,000	1. Initiating Sound & Visual. 2. 8 year cycle 3. All poles	Yes	No, original design to NESC.	Yes	Inspectors will file regular reports.	Manually
Lake Worth Utilities Dept.	27,400	1. Sound & Visual 2. 8 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes	Inspectors will file regular reports.	Manually
Keys Energy Services	27,000	1. Sound & Visual 2. 8 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes, inspecting some, requesting quality control from owner.	Inspectors will file regular reports.	Yes, using GIS data base.
Fort Pierce Utilities Authority	26,500	1. Sound & Bore 2. 8 year cycle 3. All poles	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes.	Yes, Contractor reports regularly.	Yes, using GIS data base.
New Smyrna Beach	24,000	1. Sound & Spike 2. 8 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes	Inspectors will file regular reports.	Yes, using GIS data base.
Leesburg, City of	21,500	1. Sound & Bore. 2. 8 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes.	Yes, Contractor reports regularly.	Yes, using GIS data base.
Homestead, City of	19,500	1. Visual 2. No data 3. All poles	Yes	No, original design to NESC.	Will coordinate with third-party owners.	Inspectors will file regular reports.	Yes, using GIS data base.
Winter Park, City of	14,000	1. Sound & Bore 2. 8 year cycle 3. All poles.	Visual only. Currently evaluating distribution system recently purchased for replacement program.	No, original design to NESC.	Not applicable. No shared poles.	Yes, Contractor reports regularly.	Yes, using GIS data base.
Bartow, City of	10,500	1. Sound & Spike 2. 8 year cycle	Yes, if inspection indicates potential problem.	No, original design to NESC.	Not applicable. No shared poles.	Inspectors will file regular reports.	No, but is in the process of

MUNICIPAL ELECTRIC UTILITIES – WOODEN POLE INSPECTION PROGRAMS							
Utility	Approx. No. of Customers	Requirements of Order No. PSC-06-0144-PAA-EI					
		Inspection method, cycle, pole selection:	Excavation requirement:	Attachment strength impact assessment:	Collocated facilities inspections:	Inspection program Enforcement:	Data Gathering:
		1. Sound and Bore, 2. 8 Year Cycle, 3. All Distribution and Transmission Wood Poles	Excavation of All Southern Pine, Other pole Types, per RUS Guidelines	All Poles With Attachments Assessed for Strength	Provide Plan re: How Shared Poles Will Be Inspected	Provide Plan re: How Inspection Plan Will Be Enforced	Provide Plan re: How Pole Specific Data Will Be Retained
		3. All poles.					developing program. Will use GIS
Mount Dora, City of	5,800	1. Visual 2. 2 year cycle 3. All poles	Pole replaced if questionable.	No, original design to NESC.	Yes	Inspectors will file regular reports.	Manually
Quincy, City of	4,580	1. Sound & Bore 2. 5 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes.	Inspectors will file regular reports.	Manually.
Clewiston Utilities, City of	4,135	1. Sound & Visual 2. 8 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Not applicable. No shared poles.	Inspectors will file regular reports.	Yes, using GIS data base.
Alachua, City of	3,600	1. Sound & Spike 2. 3 year cycle 3. All poles	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes.	Inspectors will file regular reports.	Manually.
Green Cove Springs, City of	3,600	1. Visual 2. 8 year cycle 3. All poles	Yes	No, original design to NESC.	Yes	Inspectors will file weekly reports.	Yes
Starke, City of	3,000	1. Sound 2. 2 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Not applicable. No shared poles.	Inspectors will file regular reports.	Manually
Wauchula, City of	2,773	1. Sound & Spike 2. 5 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes.	Inspectors will file regular reports.	Currently manual, moving to GIS
Fort Meade, City of	2,647	1. Sound & Spike 2. 6 year cycle 3. All poles.	Yes, if inspection indicates potential problem.	Yes, designed to NESC.	Not applicable. No shared poles.	Inspectors will file regular reports.	GIS
Williston, City of	1,390	1. Sound & Visual 2. Yearly 3. All poles.	Yes, if inspection indicates potential problem.	No, original design to NESC.	Not applicable. No shared poles.	Inspectors will file regular reports.	Manually

MUNICIPAL ELECTRIC UTILITIES – WOODEN POLE INSPECTION PROGRAMS							
Utility	Approx. No. of Customers	Requirements of Order No. PSC-06-0144-PAA-EI					
		Inspection method, cycle, pole selection:	Excavation requirement:	Attachment strength impact assessment:	Collocated facilities inspections:	Inspection program Enforcement:	Data Gathering:
		1. Sound and Bore, 2. 8 Year Cycle, 3. All Distribution and Transmission Wood Poles	Excavation of All Southern Pine, Other pole Types, per RUS Guidelines	All Poles With Attachments Assessed for Strength	Provide Plan re: How Shared Poles Will Be Inspected	Provide Plan re: How Inspection Plan Will Be Enforced	Provide Plan re: How Pole Specific Data Will Be Retained
Blountstown, City of	1,333	1. Visual 2. 2 year cycle 3. All poles	Yes, if inspection indicates potential problem.	No, original design to NESC.	Yes	Inspectors will file regular reports.	Yes, using GIS data base.
Havana, Town of	1,310	1. Visual 2. Yearly 3. All poles	Yes, if inspection indicates potential problem.	No, original design to NESC.	Not applicable. No shared poles	Inspectors will file regular reports.	Manually
Newberry, City of	1,300	1. Sound & Spike 2. Every 2 years 3. All poles.	Pole replaced if found defective.	No, original design to NESC.	Yes.	Yes, Contractor reports regularly.	Yes, using GIS data base.
Chattahoochee, City of	1,298	1. Sound & Spike 2. 3 year cycle 3. All poles.	Pole replaced if questionable.	No, original design to NESC.	Not applicable. No shared poles.	Inspectors will file regular reports.	Manually.
Reedy Creek Improvement District	1,213	1. All distribution underground. Visual on 5 transmission poles. 2. No data 3. All poles	Yes	No, original design to NESC.	Not applicable. No shared poles	Inspectors will file regular reports.	Only 5 poles in system – inspected annually and replaced if necessary.
Bushnell, City of	1,132	1. Sound & Spike plus Visual 2. 6 year cycle on Sound & Spike, yearly on visual. 3. On select poles for Sound & Spike.	Pole replaced if questionable.	No, original design to NESC.	Yes	Inspectors will file regular reports.	Yes, using GIS data base.
Moore Haven, City of	842	1. Sound & Spike 2. Yearly 3. All poles.	Yes, Contractor reports regularly.	No, original design to NESC.	Not applicable. No shared poles.	Inspectors will file regular reports.	Yes, using GIS data base.
St. Cloud, City of		(See Orlando Utilities Commission)					

COOPERATIVE ELECTRIC UTILITIES – WOODEN POLE INSPECTION PROGRAMS							
Utility	Approx. No. of Customers	Requirements of Order No. PSC-06-0144-PAA-EI					
		Inspection method, cycle, pole selection:	Excavation requirement:	Attachment strength impact assessment:	Collocated facilities inspections:	Inspection program Enforcement:	Data Gathering:
		1. Sound and Bore, 2. 8 Year Cycle, 3. All Distribution and Transmission Wood Poles	Excavation of All Southern Pine, Other pole Types, per RUS Guidelines	All Poles With Attachments Assessed for Strength	Provide Plan re: How Shared Poles Will Be Inspected	Provide Plan re: How Inspection Plan Will Be Enforced	Provide Plan re: How Pole Specific Data Will Be Retained
Withlacoochee River Electric Coop., Inc.	177,972	1. Sound and Bore. 2. Less than 7 year cycle 3. All wood poles.	Yes	Yes, poles are evaluated when requests for attachments are received.	Shared poles and the attachments counted every 5 years. At that time each pole is evaluated and service orders are prepared as necessary.	No	Yes, using new engineering software.
Lee County Electric Coop., Inc.	168,749	1. Sound & Probe both transmission and distribution poles. 2. 10 year cycle for distribution poles and 2 year cycle for transmission poles. 3. All wood poles. (This year LCEC begins a 3 year program for a contractor to sound, bore, excavate, and treat one third of their transmission poles per year over the next 3 years.)	No excavation of distribution poles. One third of transmission poles will be excavated per year over the next 3 years.	Yes, all entities that attach to LCEC poles provide strength assessments and they are reviewed by LCEC.	Shared poles are inspected along with non-shared poles by the methods described previously.	Contractors provide enforcement along with audits from LCEC staff.	Data is gathered in Excel spreadsheets. LCEC is installing an asset management system to collect this data and track maintenance activities.
Clay Electric Coop., Inc.	164,000	1. Sound and Bore 2. 8 year cycle. 3. All wood poles.	Yes	Yes, attaching companies must certify their attachment meets NESC loading requirements	Yes, Clay inspects all poles it has facilities located on.	Yes, Contractor audits and Clay performs random sample/audit.	Yes, in electronic data base.

COOPERATIVE ELECTRIC UTILITIES – WOODEN POLE INSPECTION PROGRAMS							
Utility	Approx. No. of Customers	Requirements of Order No. PSC-06-0144-PAA-EI					
		Inspection method, cycle, pole selection:	Excavation requirement:	Attachment strength impact assessment:	Collocated facilities inspections:	Inspection program enforcement:	Data Gathering:
		1. Sound and Bore, 2. 8 Year Cycle, 3. All Distribution and Transmission Wood Poles	Excavation of All Southern Pine, Other pole Types, per RUS Guidelines	All Poles With Attachments Assessed for Strength	Provide Plan re: How Shared Poles Will Be Inspected	Provide Plan re: How Inspection Plan Will Be Enforced	Provide Plan re: How Pole Specific Data Will Be Retained
Sumter Electric Coop., Inc.	152,000	1. Sound on all poles. Bore if required. 2. 9 year cycle for distribution, but will go to 8 year in 2007. 5 year cycle for transmission. 3. All wood poles.	Yes	Yes	Inspects and treats all poles that it uses including third party poles.	Contractor provides service then Sumter employee follows up on inspection quality.	Data input into GIS data base.
Talquin Electric Coop., Inc.	52,838	1. Sound and Bore. 2. 9.5 year cycle but will change to 8 year cycle in 2007. 3. All wood poles.	Yes	Yes for all new poles, no for existing poles when additional attachments are made.	Yes	Internal audit	Yes
Choctawhatchee Electric Coop., Inc.	36,987	1. Sound and Bore 2. 8 year cycle 3. All wood poles except CCA poles. Selective boring for CCA poles on first cycle.	All poles except CCA poles	Yes	No	Yes, Contractors have this requirement and CHELCO evaluates their work.	Data input into GIS data base.
Peace River Electric Coop., Inc.	34,500	1. Sound and Bore 2. 8 year cycle. 3. All wood poles.	Yes	Yes	Yes	Yes, by contractors and reviewed by job co0ordinators.	Yes by computer program.
Central Florida Electric Coop., Inc.	31,702	1. Sound and Bore 2. 8 year cycle 3. All wood poles.	Yes	No	Yes, inspect all poles with CFEC attachments.	Both, contractor will audit weekly and internal auditor will audit weekly	Yes, electronic data base.

COOPERATIVE ELECTRIC UTILITIES – WOODEN POLE INSPECTION PROGRAMS							
Utility	Approx. No. of Customers	Requirements of Order No. PSC-06-0144-PAA-EI					
		Inspection method, cycle, pole selection:	Excavation requirement:	Attachment strength impact assessment:	Collocated facilities inspections:	Inspection program Enforcement:	Data Gathering:
		1. Sound and Bore, 2. 8 Year Cycle, 3. All Distribution and Transmission Wood Poles	Excavation of All Southern Pine, Other pole Types, per RUS Guidelines	All Poles With Attachments Assessed for Strength	Provide Plan re: How Shared Poles Will Be Inspected	Provide Plan re: How Inspection Plan Will Be Enforced	Provide Plan re: How Pole Specific Data Will Be Retained
						or bi-weekly.	
Florida Keys Electric Coop. Ass., Inc.	31,000	1. Visual, sound and bore when in doubt. 2. 5 year cycle on distribution, transmission are all concrete or steel. 3. All wood poles.	No, the coral rock does not lend itself to excavations.	Yes	Yes, owner is responsible for inspections.	Contractors and utility management oversight.	Paper copies but are transitioning to digital records.
West Florida Electric Coop. Ass., Inc.	27,000	1. Visual 2. 10 year cycle but going to 8 year by 2007. 3. All wood poles	No	Yes	Visual inspection by staking techs and hazard recognition employee.	Internal audits	Yes, work orders and hazard recognition spreadsheet.
Suwannee Valley Electric Coop., Inc.	24,000	1. Sound & Bore (Exception – Selective boring on CCA poles) 2. 8 year cycle. 3. All wood poles.	Excavation on non CCA poles.	Yes	No, SVEC does not inspect poles it does not own.	Internal audits.	Data input into GIS data base.
Gulf Coast Electric Coop., Inc.	20,098	1. Visual, Sound, but bore only suspect poles. 2. 10 year cycle. Will be on 8 year cycle within 5 years. 3. Only wood poles over 10 years old.	No, excavate only suspect non CCA poles.	Yes	No	Contractor requirement and in house engineer inspections.	Data input into GIS data base.
Tri-County Electric Coop., Inc.	17,200	1. Sound and Bore 2. 8 year cycle 3. All wood poles.	Only poles 10 years and older are excavated.	Yes	TCEC inspects all poles it owns and will share	Inspections are performed by contractors and	Contractor provides pole inspection sheets

COOPERATIVE ELECTRIC UTILITIES – WOODEN POLE INSPECTION PROGRAMS							
Utility	Approx. No. of Customers	Requirements of Order No. PSC-06-0144-PAA-EI					
		Inspection method, cycle, pole selection:	Excavation requirement:	Attachment strength impact assessment:	Collocated facilities inspections:	Inspection program Enforcement:	Data Gathering:
		1. Sound and Bore, 2. 8 Year Cycle, 3. All Distribution and Transmission Wood Poles	Excavation of All Southern Pine, Other pole Types, per RUS Guidelines	All Poles With Attachments Assessed for Strength	Provide Plan re: How Shared Poles Will Be Inspected	Provide Plan re: How Inspection Plan Will Be Enforced	Provide Plan re: How Pole Specific Data Will Be Retained
					data with third parties if requested.	overseen by TCEC employee.	and reports that TCEC retains.
Glades Electric Coop., Inc.	16,063	1. Sound and Bore. (Osmose) 2. 10 year cycle. 3. All wood poles.	Yes	No	No	Yes, monitored internally as part of System Restoration Plan.	Yes, digital from Osmose.
Escambia River Electric Coop., Inc.	10,100	1. Visual, Sound and Bore when needed. 2. 8 year cycle 3. All wood poles.	Yes	Yes	Yes, as covered with joint use agreement.	Yes, Randomly sample the inspections performed by contractors.	No
Okefenoke Rural Electric Membership Corporation	8,883	1. Sound and Bore 2. 10 year cycle 3. All wood poles.	Yes	Yes	No	Internal audits	Yes, in GIS data base.
Alabama Electric Coop., Inc.	No Retail Customers	1. Sound and Bore 2. 4 year cycle 3. Only have Transmission poles, no distribution poles.	Yes	Yes	Yes	Internal procedures.	No
Seminole Electric Coop., Inc.	No Retail Customers	1. Visual but going to Sound and Bore by end of 2008. 2. 20 year cycle. Will be on 8 year cycle by end of 2008. 3. Only have Transmission poles, no distribution poles.	No	No	No	Internal audits	Yes, hard copy files.