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MEMORANDUM

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August 25, 2006

COMMISSION  
CLERK

TO: DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE SERVICES

FROM: OFFICE OF THE GENERAL COUNSEL (GERVASI) *pes*

RE: DOCKET NO. 060198-EI - Requirement for investor-owned electric utilities to file ongoing storm preparedness plans and implementation cost estimates.

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Attached are documents regarding Staff's Follow-up Questions to 10-Point Initiatives, to be filed in the above-referenced docket.

DATE DOCUMENT SENT TO CCA

*8/25/06*

RG

Attachment

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- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
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- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

07856 AUG 25 06

FPSC-COMMISSION CLERK

August 22, 2006

Bill McNulty  
Public Utilities Supervisor  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RE: Staff's Follow-up Questions to 10-Point Initiatives

Dear Bill:

Pursuant to the discussions at the August 8 meeting with you and your staff and your written follow-up questions to the 10-point initiatives submitted by our members on August 2, enclosed are the cooperatives' responses to your question regarding strength assessments made at the time of attachment by third parties and a contact list which contains any missing contact information initially submitted on August 2.

With respect to your inquiries on whether each cooperative has a storm plan and joint use agreements with third party attachers, all of our member-cooperatives indicated that they have storm plans in place and joint use agreements with attachers. Each cooperative is sending a copy of their storm plan (or a summary of their plan if they deem the plan confidential) to our office in Tallahassee. The PSC staff will have access to review the storm plans upon request.

Please call me or Bill if you have any questions.

Sincerely,

Michelle Hershel  
Director of Regulatory Affairs

Contact Information:

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## **FECA Member-Cooperative Responses to Pole Attachment Strength Assessment\*\***

Q: Do you perform a strength assessment at the time of attachment to determine whether the attachment will meet or exceed the strength requirements of NESC?

1. **Peace River Electric Cooperative-** No, but require compliance with the NESC.
2. **Tri-County Electric Cooperative-** No, but consulting engineering firm approves all joint use agreements and inspect our work orders. The consultants inspect joint use attachments for compliance with NESC.
3. **Central Florida Electric Cooperative-** No, but require compliance with the NESC.
4. **Escambia River Electric Cooperative-** No, but require compliance with NESC.
5. **Okefenoke Rural Electric Membership Corporation-** Yes, the attaching company is required by the agreement to have a professional engineer, licensed in the state where the work is performed, certify that the attachments are of sound engineering design and fully comply with the latest edition of the NESC.
6. **Sumter Electric Cooperative-** Yes, SECO has approximately 150,000 distribution poles on its system. SECO allows both cable television (CATV) companies and telephone companies to attach to these poles. Presently SECO has approximately 41,500 CATV attachments and 31,000 telephone company attachments on its distribution poles. SECO attaches its facilities to approximately 150 Embarq (a.k.a. Sprint) poles.

Whenever a joint-use attachment request is made to SECO, an engineering representative determines the feasibility of the request. They go to the location, verify that SECO owns the pole and then they ensure that the existing structure will provide both the necessary clearance and strength requirements dictated by the National Electric Safety Code (NESC). If either of these conditions is not met, the requesting utility must pay for the necessary make-ready costs prior to SECO constructing the facility upgrades.

7. **Glades Electric Cooperative-** No, but require compliance with the NESC.
8. **Talquin Electric Cooperative-** No, but require compliance with the NESC.
9. **West Florida Electric Cooperative-** No, but require compliance with the NESC.
10. **CHELCO-** Yes, CHELCO designs all initial pole installations to withstand three additional joint use attachments. The NESC is used in determining the proper class pole required to meet strength and wind load standards. Additional attachment requests are required to submit (provided by the requesting party) proper engineering calculations to substantiate the existing pole size and class or new required size and class to accommodate the desired attachments.
11. **Suwannee Valley Electric Cooperative-** No, but require compliance with the NESC.
12. **Florida Keys Electric Cooperative-** Yes, underbuilt attachments to some sections of existing transmission system prohibited as loading has reached our wind resistance limits. New attachments to existing distribution require adequate guys and anchors.
13. **Clay Electric Cooperative-** Yes,  
By contract all attaching telephone companies are required to meet NESC strength and clearance requirements. For attaching cable television companies Clay requires them to also meet NESC strength and clearance requirements but they must also submit detailed plans and drawings for each attachment. These plans and drawings are to be prepared by a qualified engineer, registered and currently licensed to practice engineering in the State of Florida. Also within ten days of completion of attachments the engineer who signed the original plans and drawings must execute another form certifying the attachments have been completed and no poles or facilities of Clay are in violation of NESC.
14. **Gulf Coast Electric Cooperative-** No, but require compliance with the NESC.
15. **Withlacoochee River Electric Cooperative-** Yes,  
Upon receipt of application from the potential joint user requesting permission to attach to our structures, one of our District Engineering Services Technicians reviews the application and visits the proposed site.

The Technician typically will assess the existing structure for clearance, strength, guying, and overall condition and/or age. If the pole is of a sufficient size to allow for all of the NESC required clearances and meets or exceeds a "Class" category that has been pre-approved by engineering to compensate for the added strain, and no other adverse issues exist, the Tech will contact the requesting company and give them permission to attach. If there will be a need to upgrade the pole to a stronger/taller size that information is also passed along as a condition to their attachment. Additionally, our employees note any guying requirements for dead-end or angle poles and follow-up to make sure that all necessary equipment has been installed.

Normal inspections and line patrols include verification that joint use attachments continue to meet all applicable standards. When they do not or when we find attachments that have been attached without our permission and prior approval, the offending company is contacted and the situation is corrected.

A complete audit of the entire system is conducted every five years primarily for the accounting necessity of "truing-up" the billing for the attachments. That audit is always conducted in association with representatives of the cable and telephone companies in the area. Every pole and structure is visited, reviewed, and noted on a map. Any irregularities are noted and formal Service Orders are issued for correction.

**\*\*Seminole Electric Cooperative and Alabama Electric Cooperative do not have attachments with third parties.**