

**Matilda Sanders**

**ORIGINAL**

**From:** terry.scobie@verizon.com  
**Sent:** Wednesday, May 30, 2007 2:52 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** de.oroark@verizon.com; David Christian; frank.app@verizon.com  
**Subject:** Docket Nos. 070297-EI, 070298-EI and 070301-EI - Preliminary Comments of Verizon Florida LLC  
**Attachments:** VZ Florida Storm Hardening Comments-5-30-07.pdf

The attached filing is submitted on behalf of Verizon Florida LLC by

Dulaney L. O'Roark III  
Six Concourse Parkway  
Suite 800  
Atlanta, Georgia 30328  
(770) 284-5498  
de.oroark@verizon.com

The attached .pdf document contains 4 pages - transmittal letter (1 page), Comments (2 pages) and Certificate of Service (1 page).

*(See attached file: VZ Florida Storm Hardening Comments-5-30-07.pdf)*

Terry Scobie  
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Verizon Legal Department  
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terry.scobie@verizon.com

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- COM \_\_\_\_\_
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Dulaney L. O'Roark III  
Vice President & General Counsel, Southeast Region  
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May 30, 2007 – VIA ELECTRONIC MAIL

Ann Cole, Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 070297-EI  
Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to  
Rule 25-6.0342, FAC, submitted by Tampa Electric Company

Docket No. 070298-EI  
Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to  
Rule 25-6.0342, FAC, submitted by Progress Energy Florida, Inc.

Docket No. 070301-EI  
Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to  
Rule 25-6.0342, FAC, submitted by Florida Power & Light Company

Dear Ms. Cole:

Enclosed are the Preliminary Comments of Verizon Florida LLC for filing in the above-referenced matters. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (770) 284-5498.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION **ORIGINAL**

In re: Review of 2007 Electric Infrastructure ) Docket No. 070297-EI  
Storm Hardening Plan filed pursuant to Rule ) Filed: May 30, 2007  
25-6.0342, FAC, submitted by Tampa Electric )  
Company )  
\_\_\_\_\_ )

In re: Review of 2007 Electric Infrastructure ) Docket No. 070298-EI  
Storm Hardening Plan filed pursuant to Rule )  
25-6.0342, FAC, submitted by Progress )  
Energy Florida, Inc. )  
\_\_\_\_\_ )

In re: Review of 2007 Electric Infrastructure ) Docket No. 070301-EI  
Storm Hardening Plan filed pursuant to Rule )  
25-6.0342, FAC, submitted by Florida Power & )  
Light Company )  
\_\_\_\_\_ )

**PRELIMINARY COMMENTS OF VERIZON FLORIDA LLC**

In response to Staff's Memorandum dated May 14, 2007, Verizon Florida LLC ("Verizon") files these preliminary comments concerning the storm hardening plans filed by Tampa Electric Company ("TECO"), Progress Energy Florida, Inc. ("PEF") and Florida Power & Light Company ("FP&L").

Verizon has reviewed the storm hardening plans of TECO, PEF and FP&L, which are the three investor-owned utilities in its service territory. The plans provide a general description of the work each company has proposed, but lack the detail necessary to evaluate the costs to third-party attachers such as Verizon. Verizon cannot assess hardening projects without knowing in advance engineering detail such as what routes will be included. Verizon has met with TECO, PEF and FP&L to gain a better understanding of plan implementation and intends to continue working with them to obtain engineering detail before construction of each project. If Verizon determines that

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implementation of the storm hardening plans would impose undue costs, Verizon will make an appropriate filing with the Commission.

Respectfully submitted on May 30, 2007.

By: s/ Dulaney L. O'Roark III  
Dulaney L. O'Roark III  
General Counsel-Southeast Region  
Verizon  
Six Concourse Parkway, Suite 800  
Atlanta, GA 30328  
  
Attorney for Verizon Florida LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that copies of the foregoing were sent via U. S. mail on

May 30, 2007 to:

Staff Counsel  
Florida Public Service Commission  
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Tallahassee, FL 32399-0850

Bill Walker  
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Tampa, FL 33601-0111

s/ Dulaney L. O'Roark III