

**ORIGINAL**

**Timolyn Henry**

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**Sent:** Wednesday, May 30, 2007 4:42 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Susan Masterton; Sandy Khazraee  
**Subject:** Docket No. 070298 Embarq's Preliminary Comments on Progress Energy Florida, Inc.'s Infrastructure Storm Hardening Plan  
**Attachments:** 070298 Preliminary Comments of Embarq 5 30 2007 (2).doc

**Filed on Behalf of:** Susan S. Masterton

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**Docket No.** 070298-EI

**Title of filing:** *Embarq Florida, Inc.'s Preliminary Comments on Progress Energy Florida, Inc.'s Infrastructure Storm Hardening Plan*

**Filed on behalf of:** Susan Masterton

**No of pages:** 5 pages

**Description:** *Embarq Florida, Inc.'s Preliminary Comments on Progress Energy Florida, Inc.'s Infrastructure Storm Hardening Plan*

<<070298 Preliminary Comments of Embarq 5 30 2007 (2).doc>>

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**EMBARQ**

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May 30, 2007

Ann Cole  
Office of Commission Clerk  
Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

Re: Docket No. 070298-EI; Embarq Florida, Inc.'s Preliminary Comments

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida Inc. are the Embarq's Preliminary Comments on Progress Energy Florida, Inc. Infrastructure Storm Hardening Plan.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions regarding this electronic filing, please do not hesitate to call me at 850/599-1560.

Sincerely,

s/ Susan S. Masterton  
Susan S. Masterton

Enclosure

Susan S. Masterton  
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## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic Mail and U.S. Mail (\*) this 30th day of May, 2007, to the following:

Adam Teitzman (\*)  
H. Mann  
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Director, Regulatory Affairs  
106 E. College Ave., Suite 800  
Tallahassee, FL 32301

s/ Susan S. Masterton

Susan S. Masterton

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Review of 2007 Electric Infrastructure )  
Storm Hardening Plan filed pursuant to Rule ) DOCKET NO. 070298-EI  
25-6.0342, F.A.C., submitted by Progress ) FILED: May 30, 2007  
Energy Florida, Inc. )  
\_\_\_\_\_ )

**PRELIMINARY COMMENTS OF EMBARQ – FLORIDA, INC.**

Pursuant to the May 14, 2007 memorandum from the Commission's Staff Counsel, Embarq – Florida, Inc. (Embarq) submits these preliminary comments regarding Progress Energy Florida, Inc.'s ("Progress") "Electric Infrastructure Storm Hardening Plan" (the "Plan") dated and filed in this docket on May 7, 2007. By filing these comments, Embarq does not waive any objection it might otherwise have the right to make in any formal proceeding related to this docket or other legal or regulatory proceeding.

Embarq has reviewed the plans submitted by four of the five Investor Owned Utilities (IOUs) in this Electric Infrastructure Hardening initiative. The plans were submitted by Florida Power & Light, Progress Energy, Tampa Electric Company and Gulf Power Company. (Embarq contacted Florida Public Utilities Company (FPUC) for a copy of their draft plan but learned that FPUC has requested a rule variance from the Commission and does not yet have a plan to share with the attachers.) Although there are very limited details provided in the plans, Embarq has attempted to develop an anticipated impact based on the information provided. While impacts specific to each plan are provided in the individual comments filed within each IOU's docket, Embarq estimates the total impact to Embarq of these planned hardening initiatives throughout the combined service territory of the aforementioned IOUs is ten to twenty million dollars

during the first three years of the plans. The additional comments following are specific to the Progress plan.

Embarq reviewed the draft hardening plan provided by Progress for the years 2007 through 2009 as presented in two meetings Progress held with the third party attachers. Embarq provided brief comments on the plan to Progress on May 4, 2007 and reiterates those comments below in this filing for the Commission.

The plan identified 17 storm hardening projects which Progress proposes to complete in the Embarq service territory during the three year time frame identified. The estimated cost to Embarq associated with those 17 projects is \$425,000.00.

Progress's plan may benefit Embarq by reducing the amount of damage to our facilities, thereby reducing the number of outages and reducing the time to restore service. The extent of those benefits will not be known until the next storm following implementation of the changes and they cannot be readily quantified in dollar savings; Embarq does not know whether these benefits will outweigh the costs.

Embarq appreciates the opportunity to submit these comments for the Commission's consideration and looks forward to participating in these proceedings.

Respectfully submitted this 30th day of May, 2007.

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