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COMMISSION
CLERK

May 31, 2007

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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

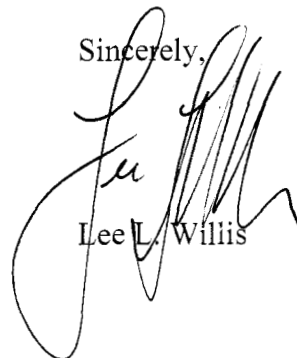
Dear Ms. Cole:

Enclosed herewith for filing on behalf of Tampa Electric Company are the original and fifteen (15) copies of Tampa Electric's Response to Florida Cable Telecommunications Association's April 27, 2007 comments and questions concerning the Company's Draft 2007-2009 Storm Hardening Plan.

Please acknowledge receipt of this document by stamping the extra copy of this letter "filed" and returning the same to me.

Thank you for your assistance with this filing.

Sincerely,



Lee L. Willis

LLW/bjd
Enclosures

DOCUMENT NUMBER-DATE

04445 MAY 31 0

FPSC-COMMISSION CLERK

ORIGINAL



TAMPA ELECTRIC

May 31, 2007

Ms. Maria Browne
Davis Wright Tremaine LLP
Suite 200
1919 Pennsylvania Avenue, N.W.
Washington, D.C 20006-3402

Re: Docket No. 070297-EI
Florida Cable Telecommunications Association's April 27, 2007 Response to
Tampa Electric Company's Draft 2007-2009 Storm Hardening Plan

Dear Ms. Browne:

Tampa Electric Company ("Tampa Electric") appreciates the effort put forth by the Florida Cable Telecommunications Association ("FCTA") in providing a timely review and initial feedback of Tampa Electric's 2007-2009 Storm Hardening Plan ("Plan") draft. As it was difficult for the company to formulate the draft Plan in a relatively short time period, likewise it was challenging for FCTA to develop its comments in quick fashion.

Tampa Electric has given careful consideration to FCTA's initial feedback. In its May 7 filing of the Plan with the Florida Public Service Commission, the company has addressed some of FCTA's concerns. While all of FCTA's suggestions were not incorporated in the May 7 filing, Tampa Electric believes an open dialogue could provide the opportunity for a better understanding of the remaining concerns from either party.

Tampa Electric has developed a document in response to FCTA's initial feedback and attached it to this correspondence. The document frames the various FCTA concerns and provides a Tampa Electric response immediately following each issue.

Sincerely,

Howard Bryant

Attachment

Cc: Ann Cole, Commission Clerk - Florida Public Service Commission

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Tampa Electric's Response to the Florida Cable Telecommunications Association's Comments and Questions Concerning the Company's 2007-2009 Storm Hardening Plan

Tampa Electric has reviewed the April 27, 2007 letter from the Florida Cable Telecommunications Association ("FCTA") which states FCTA's concerns with Tampa Electric's 2007-2009 Storm Hardening Plan ("Plan"). The company is appreciative of the input FCTA provided and has incorporated appropriate changes into its Plan. In this response to the FCTA letter, Tampa Electric has endeavored to identify each concern FCTA raised in the various sections of the Plan and attempted to address its disposition.

Section 5: Definitions

FCTA concern: FCTA has questions concerning the definition of Tampa Electric's transmission and distribution voltages between 13 kV and 69 kV.

Tampa Electric response: Concerning the definitions of transmission and distribution voltages, Tampa Electric has modified these definitions as follows: transmission voltage is electric facilities operating at 69 kV and above, distribution voltage is electric facilities operating below 69 kV.

FCTA concern: FCTA has questions concerning Tampa Electric's definition of an Attacher.

Tampa Electric response: In regards to the definition of an Attacher, grounding wires or lugs along with other attachments such as equipment boxes or switching cabinets that are attached by attaching entities to Tampa Electric poles are considered an attachment when secured to the pole in such a way that would restrict Tampa Electric's use of the space occupied by such an apparatus or that would limit Tampa Electric's ability to replace the pole with a new one and pull the old pole. Depending on the height of these attachments, the loading of the pole may be affected.

Section 6: Construction Standards, Policies, Practices, and Procedures

6.1.2.1 Overhead System

FCTA concern: FCTA would like to see Tampa Electric's distribution construction standards in order to provide input.

Tampa Electric response: Tampa Electric's general framing specifications which are specific to joint use poles are included in its Licensee contracts with

attaching entities and are subject to change. The current general framing specifications which are specific to joint use poles have been added to Tampa Electric's filed Plan.

6.1.2.2 Underground Facilities

FCTA concern: FCTA would like to view Tampa Electric underground distribution construction standards.

Tampa Electric response: Tampa Electric is unclear as to what additional information is needed.

6.1.2.3 Location of Facilities

FCTA concern: FCTA would like Tampa Electric to include very detailed guidelines with input from attachers both in the Plan and throughout restoration efforts after a storm.

Tampa Electric response: Tampa Electric has modified its Plan to include coordination with third party attachers regarding any relocation of lines from back lot to front.

Section 7: Deployment Strategy

7.2.2.1 Pole Replacements (4th paragraph)

FCTA concern: FCTA would like the details of the circumstances which prompt Tampa Electric to conduct a pole loading analysis.

Tampa Electric response: The Commission hardening rules require loading analysis on all poles that have third party attachments. Tampa Electric is using a two step approach to this. The first step will include a pole load screening. All poles that fail the screening test will require a comprehensive loading analysis to confirm the overload actually exists. The comprehensive loading analysis involves a visit to the pole to gather all attachments heights and to confirm the data components such as wire sizes, equipment sizes and the construction configuration of the pole.

7.3.3 Post Storm Data Collection and Forensic Analysis

FCTA concern: FCTA would like to see more information regarding plans for forensic analysis of pole/structure damage and likely cause of damage.

Tampa Electric response: Tampa Electric would be glad to meet with CATV operator companies to discuss Tampa Electric's plans for forensic analysis of pole/structure damage and the likely cause of the damage. In addition, the company is willing to discuss how assessments can be jointly performed.

7.4 Extreme Wind Pilot Program

FCTA concern: FCTA agrees with Tampa Electric's deployment strategy.

Tampa Electric response: Tampa Electric has no comment.

7.5.1 Third Party Attacher Benefits and Impact

FCTA concern: FCTA would like an explanation of how Tampa Electric will determine the attaching entity responsible for overloads.

Tampa Electric response: Tampa Electric has amended this section of the plan to more clearly address the issue of determining responsibility. In general, each situation will be addressed on a case by case basis. Where an attaching entity has overloaded the pole, Tampa Electric will evaluate the situation with that entity and work toward a mutually satisfactory remedy. If necessary, Tampa Electric is willing to discuss this further using a sample pole.

FCTA concern: FCTA requests detailed engineering and construction plans when available.

Tampa Electric response: At this time, the company's hardening projects have been developed to a high level estimate. As with other third party attachers, Tampa Electric engineering personnel are willing to meet with FCTA representatives in the field and travel the various hardening routes. Tampa Electric's expectations are that most attacher costs will be associated with transferring equipment from existing poles to the new stronger poles.

FCTA concern: FCTA would like more specific information regarding grade B vs. grade C construction to better assess the true impact.

Tampa Electric response: The transition from grade C to grade B construction is not a change in Tampa Electric's current standard. Grade B construction has been the company's construction standard since the 1970s.

FCTA concern: FCTA believes audits should be deleted from the Plan.

Tampa Electric response: Tampa Electric respectfully disagrees with the statement that the last paragraph in the section pertaining to audits should be deleted from the Plan. It is a requirement of the Commission's hardening rules that audits be performed and the results reported annually.

Section 8: Attachment Standards and Procedures

8.2 Permit Application Procedure

FCTA concern: FCTA states that Tampa Electric is now requiring a complete permit application for overlashing.

Tampa Electric response: Tampa Electric has no comment.

8.2.1 Permit Application Documentation

FCTA concern: FCTA believes that the deposit fee in the amount of \$200 per pole falls under the jurisdiction of the FCC, is not allowed by the FCC, and should not be included.

Tampa Electric response: Tampa Electric has incorporated a change to this section of the Plan as a result of FCTA's comments. Several of Tampa Electric's negotiated licensee agreements include the deposit provision as part of the make-ready process. In addition, Tampa Electric will invoke this requirement where attaching entities are not credit worthy. Credit worthiness is determined on a case by case basis and is based on payment history.

8.2.2 Permit Engineering Study Review

FCTA concern: FCTA has stated a complete structural loading study for each pole will add to the time currently taken to process applications for new attachments and for overlashing which previously was not subject to permitting and that it will have a significant impact on attaching entities' speed to the market.

Tampa Electric response: Structural loading analysis is not new to Tampa Electric's engineering study review process. The following are responses to the specific questions asked by FCTA.

- a.) **FCTA concern:** "If an existing cable is delashed and removed from an existing bundle and replaced by one of equal or smaller diameter and weight, will a loading study still be required?"

Tampa Electric response: Yes. For safety purposes, an engineering review is performed on all poles regardless of the attachment being new or replaced. Over the years, many attachments and over lashed attachments were placed on poles without Tampa Electric's knowledge or permission and without an engineering study review.

- b.) **FCTA concern:** “When a load study is required, will it be necessary for every pole or would TECO accept a study for worst case poles in a portion of line?”

Tampa Electric response: Tampa Electric’s current process is to perform the analysis on all poles unless one or more in a series are constructed in the exact same manner with the exact span lengths between poles.

- c.) **FCTA concern:** “Will TECO require and perform a loading analysis for each new or larger attachment placed on poles by TECO?”

Tampa Electric response: Yes. Tampa Electric’s design technicians and engineers are required to perform loading analysis on all poles being altered or to which additions of new facilities are being made.

- d.) **FCTA concern:** “Will TECO consider the approach taken by the New York Public Service Commission in Case 03-M-0432 as demonstrated by the Policy Statement on Pole Attachments developed therein, which we include for ease of reference as Attachment A to the Letter?”

Tampa Electric response: No. Tampa Electric’s permitting process is not new. Experience has shown that Tampa Electric’s process is an effective one and ensures safe and reliable electric service which is required by the Commission.

8.3.3 Make Ready Construction Required by Existing Third Party Attacher

FCTA concern: FCTA believes that the coordination of make ready work is a term and condition of attachment that is regulated by the FCC, and the FCC has stated that pole owners have a duty to coordinate third party make ready work as part of their obligation to provide access to poles.

Tampa Electric response: Tampa Electric understands FCTA’s concerns on this matter. History has shown that the company’s Joint Use department has little influence over the coordination process. With the growing competition among third party attachers vying for the same customers (i.e., CATVs now offering telephone and broadband, and ILECs offering CATV services and broadband), Tampa Electric has found that the coordination process is better served by direct negotiations between the third parties themselves. There are various issues that are not appropriate for Tampa Electric’s involvement (e.g., reimbursement of costs between the permitting party and the existing third parties needing to perform make-ready work). If necessary, Tampa Electric is willing to discuss this issue further with its local attaching entities.

8.4.1 Code Violations

FCTA concern: FCTA has asked if Tampa Electric has encountered any communication problems using NJUNS.

Tampa Electric response: The only communications problems Tampa Electric has encountered using NJUNS relate to users. The system works as designed when properly utilized.

FCTA concern: FCTA has asked Tampa Electric to explain how its standards differ from NESC and provide a complete copy of TECO construction standards.

Tampa Electric response: The NESC is a safety guideline, not a construction standard. A copy of Tampa Electric's current General Rules and Specifications will be provided for viewing to the FCTA at Tampa Electric's offices, but will not be submitted as part of the company's Plan. As stated in the NESC, "This Code is not intended as a design specification or as an instruction manual". The NESC is the basis of Tampa Electric's construction standards, policies and procedures. Tampa Electric's construction specifications meet or exceed the NESC.

8.6 Permit Closeout and Final Billing

FCTA concern: FCTA believes that billing issues are subject to the FCC jurisdiction and should not be included in this the Plan.

Tampa Electric response: The Commission has required that Tampa Electric file its Joint Use Attachment Procedures and Construction Standards.

8.7 Pole Inspection Audit

FCTA concern: FCTA would like further explanation how Tampa Electric will determine which party is causing overloading and how costs will be allocated based upon its findings.

Tampa Electric response: This question has been addressed in an earlier response. Tampa Electric does not have a specific plan for allocating costs since this determination will be based on a specific set of circumstances and on a case by case basis per pole.

8.8 Joint Use Pole Audit

FCTA concern: FCTA would like further explanation on the criteria that TECO will use to determine whether to conduct an audit annually. Secondly, FCTA would like further explanation in detail Tampa Electric's proposal for cost sharing.

Tampa Electric response: Tampa Electric will perform a pole attachment audit on an eight-year cycle at a minimum in order to comply with Commission requirements. However, many of the company's licensee agreements provide for audits to be performed annually with the cost being born by the licensee per the terms of the agreement. Tampa Electric has found that the most cost effective way to perform an audit is to visit the pole once and allocate the cost of the audit among the parties who have attachments to the poles.