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ORIGINAL

July 3, 2007

BY HAND DELIVERY

Ms. Ann Cole, Director
Commission Clerk and Administrative Services
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

RECEIVED-FPSC
07 JUL -3 PM 3:00
COMMISSION CLERK

Re: Docket No. 070300-EI

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Public Utilities Company are an original and 7 copies of Florida Public Utilities Company's Petition for Approval of Storm Hardening Plans in the above referenced docket.

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

Thank you for your assistance with this filing.

Sincerely yours,

Handwritten signature of Norman H. Horton, Jr.

Norman H. Horton, Jr.

- CMP
COM
CTR
ECR
GCL
OPC
RCA
SCR
SGA
SEC
OTH

NHH/amb
Enclosures
cc: Mr. Mark Cutshaw
Parties of Record

DOCUMENT NUMBER-DATE
05581 JUL -3 07
FPSC-COMMISSION CLERK

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Public Utilities Company)
for approval of its 2007 Storm Hardening Plan)

Docket No. 070300-EI
Date Filed: July 3, 2007

**FLORIDA PUBLIC UTILITIES COMPANY'S PETITION FOR
APPROVAL OF STORM HARDENING PLAN**

Florida Public Utilities Company ("FPUC" or "Company"), pursuant to Rule 25-6.0342, Florida Administrative Code, hereby petitions the Florida Public Service Commission ("Commission") to approve Florida Public Utilities Company's 2007 Storm Hardening Plan. In support of its request, FPUC would state::

1. FPUC is a public utility subject to the jurisdiction of the Commission under Chapter 366, Florida Statutes. The Company's principal offices are located at:

Florida Public Utilities Company
401 South Dixie Highway
West Palm Beach, FL 33401

2. All notices, pleadings and correspondence required to be served on the Petition should be directed to:

Norman H. Horton, Jr.,
Messer, Caparello & Self, P. A.
2618 Centennial Place 32308
Post Office Box 15579
Tallahassee, FL 32317
Telephone – (850) 222-0720
Fax – (850) 558-0664

Mr. Mark Cutshaw
Florida Public Utilities Company
Post Office Box 418
Fernandina Beach, FL 32035-0418

3. Rule 25-6.0342, Florida Administrative Code, relating to hardening of electric infrastructure against storms and other severe weather events was adopted by Order No. PSC-07-0043A-FOF-EI issued January 17, 2007, and became effective on February 5, 2007. The new rule requires, among other things, that each investor-owned utility file with the Commission for its approval a detailed storm hardening plan within 90 days of the rule's effective date.

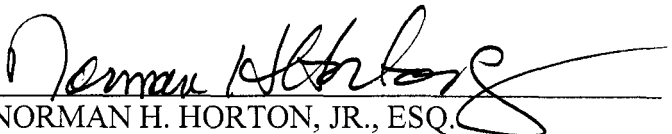
4. On May 4, 2007, FPUC filed a Petition for Waiver of the filing date, seeking a 60 day extension to file the plan. That waiver was granted and the plan is due July 6, 2007.

5. In accordance with Rule 25-6.0342, Florida Administrative Code, FPUC has prepared and attached hereto as Exhibit "A," its 2007 Storm Hardening Plan. The plan addresses each of the requirements of Rule 25-6.0342 and meets the desired objectives of the rule.

WHEREFORE, Florida Public Utilities Company respectfully requests that the Commission enter an order approving FPUC's 2007 Storm Hardening Plan as reflected in Exhibit "A."

Dated this 3rd day of July, 2007.

MESSER, CAPARELLO & SELF, P.A.
2618 Centennial Place (32308)
Post Office Box 15579
Tallahassee, FL 32317
(850) 222-0720


NORMAN H. HORTON, JR., ESQ.

Attorneys for Florida Public Utilities Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been served by U. S. Mail this 3rd day of July, 2007 upon the following:

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NORMAN H. HORTON, JR.



Florida Public Utilities Company

Storm Hardening Plan 2007 - 2009

Docket Nos. 060172-EU & 060173-EU
Order No. PSC-07-0043A-FOF-EU

June 2007

EXHIBIT "A"

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FLORIDA PUBLIC UTILITIES COMPANY

DOCKET NO. 060172-EU, DOCKET NO. 060173-EU AND ORDER NO. PSC-07-0043A-FOF-EU INVOLVING REQUIREMENT FOR INVESTOR OWNED ELECTRIC UTILITIES TO ADDRESS ONGOING STORM PREPAREDNESS PLANS AND IMPLEMENTATION COST ESTIMATES

INTRODUCTION

This filing is to address the 10 part Storm Initiative plan filed in Docket No. 060198-EI. This also addresses the Storm Hardening Plan as outlined in Dockets 060172-EU and 060173-EU, Requirement for Investor Owned Electric Utilities to File Ongoing Storm Preparedness Plans and Implementation Cost Estimates as set forth in FPSC Order PSC-07-0043A-FOF-EU.

FPUC currently plans to implement the plans contained in this document in conjunction with the completion of the next rate proceeding which is anticipated in May 2008. Some of the initiatives are currently underway or will begin in 2007 with the remaining items to follow in 2008. Should conditions allow for an earlier date to initiate additional plans, that information will be communicated to all parties involved.

FPUC is currently in the process of developing a specification manual that will take into consideration all the plans shown below. Based on this, some of the information requested has not yet been developed but will be provided to all interested parties upon completion.

1.0 Wood Pole Inspection Plan

Florida Public Utilities Company (FPUC) will implement an eight year inspection cycle on all wooden transmission and distribution poles based on the requirements of the National Electric Safety Code (NESC). The results of this inspection will be reported annually, by March 1, to the Commission regarding the results of the prior calendar year inspections of its wooden transmission and distribution poles.

FPUC will perform inspections, in accordance with the predetermined cycles, of all wooden transmission and distribution poles. Cycles will be established, by division, based on a logical and efficient method of inspecting poles and considering previous inspection cycles. The cycles may fluctuate year to year based on other factors but will ensure that all poles are inspected at a minimum of eight year intervals.

Experience of previous visual inspections has suggested that newer CCA poles do not need the extensive inspection as has been proposed. However, since factual data has not yet been collected, all poles will be inspected as shown below until such time that the inspections results and data verify this fact. At that time, with commission approval, this program may be modified.

Inspection Process

The inspection will consist of a visual inspection to determine if any defects are found that would require that the pole be replaced. Should this test indicate that the pole is not suited

for continued use, it will be rejected and the appropriate corrective action (replacement, bracing, etc.) will be planned.

If the pole is found acceptable on the visual inspection, the pole will be sound and bored to determine the internal condition of the pole. Should this test indicate that the pole is not suited for continued use, it will be rejected and the appropriate corrective action (replacement, bracing, etc.) will be planned.

If the pole is found acceptable in the sound and bored test, all non-CCA poles and all CCA poles will be excavated and tested. If this test indicates the pole is suitable for continued service, the pole will be treated and backfilled. Should this test indicate that the pole is not suited for continued use, it will be rejected and the appropriate corrective action (replacement, bracing, etc) will be planned. Methods are available from Contractors that will allow below ground inspection of poles in concrete or asphalt areas. These methods will be utilized to inspect in accordance with procedures above.

FPUC will perform both strength and loading assessments on each pole inspected should the above mentioned test indicate that the pole is suitable for continued use.

Strength and Loading Assessment

The Strength Assessment will compare the current measured circumference to the original circumference of the pole. The effective circumference of the pole will be determined to ensure that the current condition of the pole meets the NESC requirements in Table 261-1A of the NESC. Should this test indicate that the pole is not suited for continued use, it will be rejected and the appropriate corrective action (replacement, bracing, etc.) will be planned.

The Loading Assessment will consider actual attachments on the pole. In performing this test field measurements, span lengths, attachment heights, wire sizes and other attachments (including 3rd party attachments) will be analyzed in order to determine if current FPUC specifications are met and if this application meets NESC requirements. Should this test indicate that the pole is not suited for continued use, it will be rejected and the appropriate corrective action (replacement, bracing, etc.) will be planned.

Should poles be encountered that are of the same size, condition and construction, sampling will be conducted in order to ensure the strength and loading characteristics are sufficient.

FPUC will collect all relevant information on the pole inspections on an annual basis for all FPUC owned poles. Information will be maintained in a spreadsheet format by location, pole size, pole class, test results, etc. and be in such a form that summary information can be developed. Poles owned by other companies will be inspected in accordance with their specific procedures and FPUC will cooperate with any work caused by pole replacements. FPUC will work closely with 3rd party owners to share information on all poles in order to ensure work is completed in a timely manner.

In order to ensure the integrity of the pole inspection procedure, the contractor will be requirement to perform quality control assessments of work in order to ensure pole inspection requirements are being met and provide documentation that this has occurred. FPUC will also random sample the results presented in order to verify and document results.

FPUC will submit a summary report, as required, to the Division of Economic Regulation by March 1 of each year outlining results of the previous year’s inspection. The summary will include type of inspection, poles inspected, pole data, poles rejected, reasons for rejection, and poles replaced or braced. This information will be analyzed on a continuing basis to determine trends associated with pole replacements in order to improve the overall inspection program.

Annual costs to perform the inspections as indicated above are approximately \$220,000. The inspections will involve approximately 3050 poles per years. Initial expectations are of the poles inspected, approximately 6.5% (200 poles) will require replacement. The associated cost to replace or brace the poles will be approximately \$300,000 per year

2.0 Ten Part Storm Preparedness Plan

2.1 Vegetation Management

FPUC currently plans to begin complying with a three year vegetation management cycle on main feeders beginning in 2008. The plan also includes a six year vegetation management cycle on laterals on the system. Although data is not readily available for the FPUC system, other companies with the necessary data have justified this increased trim cycle based on that data.

The program will include the following:

1. Three year vegetation management cycle on all main feeders.
2. Six year vegetation management cycle on all laterals.
3. Annual inspection of main feeders to critical infrastructure prior to the storm system to identify and perform the necessary trimming.
4. Actively address danger trees located outside the normal trim zone and located near main feeders.
5. Increased participation with local governments to address vegetation management and alternatives in order to improve overall reliability due to tree related outages.
6. Public education of customers regarding the maintenance and placement of trees.

Based on updated 2007 information, the total system to be maintained in the vegetation management program involves 723 miles of distribution lines and 21.5 miles of transmission lines. The distribution lines are made up of 147 miles of main feeders and 576 miles of laterals. Below is an analysis of the resources necessary to achieve the desired results for either a complete three year cycle and a three year main feeder and six year lateral cycle. The analysis also includes efficiency rates of 50, 40 and 35 miles per crew per year. The overall year to date average for 2007 is 36 miles per year per crew.

Number of tree trimming crews for overall three year cycle

Total Miles	50 miles/crew	40 miles/crew	35 miles/crew
723 miles	4.8	6.0	6.9

Number of tree trimming crews for main feeder three year cycle and six year lateral cycle

Line Miles	50 miles/crew	40 miles/crew	35 miles/crew
147 miles (feeders)	1.0	1.2	1.4
576 miles (laterals)	1.9	2.4	2.7
Total Resources	2.9	3.6	4.1

Line Miles (NW FL)	50 miles/crew	40 miles/crew	35 miles/crew
112 miles (feeders)	0.8	0.9	1.1
514 miles (laterals)	1.7	2.1	2.4
Total Resources	2.5	3.0	3.5

Line Miles (NE FL)	50 miles/crew	40 miles/crew	35 miles/crew
35 miles (feeders)	0.2	0.3	0.3
62 miles (laterals)	0.2	0.3	0.3
Total Resources	0.4	0.6	0.6

Based on the 2007 average trim rate and the three year main feeder and six year lateral cycle, four crews are needed in NW FL and one crew is needed in NE FL to maintain this cycle. In addition to this, one additional crew will be needed in each area to address danger tree removal and transmission line trimming (NE Florida only). The overall result will be a total of seven (7) tree trimming crews which is two tree trimming crews above the amounts included in the last rate proceeding. For 2007, FPUC currently has four (4) tree trimming crews which average approximately \$117,420 (2007 cost) per year. Based on current staffing levels, the addition of three (3) tree trimming crews based on 2007 cost will be approximately \$352,260 per year.

FPUC will increase the data collected for our vegetation management program. This data will include the miles of line trimmed annually to ensure the program meets the objectives outlined. Data collected will include detail on trees trimmed, tree density, danger trees removed, etc. which will be used begin comparing vegetation management productive with the number of tree related outages. This information will be used to either justify or modify the existing program to ensure maximum cost benefits and reliability improvements.

2.2 Joint-Use Pole Attachment Audit

FPUC currently has joint use agreements with multiple telecommunication and cable television providers. Although the agreements allow joint use attachments audits, these audits have not been completed as allowed in the contracts. Beginning in 2007, audits will be initiated with all joint use attachers in order to identify the total number of attachments and identify any violations that may exist. Based upon the recent, or upcoming, completion of the GIS mapping information, joint use attachments are being collected and can be used as a basis when conducting the audits.

FPUC currently has identified a total of 4,449 (2950 – NW FL and 1599 – NE FL) telecommunication attachments and 8,949 (6343 – NW FL and 2606 – NE FL) cable television attachments within the distribution system. FPUC is also attached to 512 (102 – NW FL and 410 – NE FL) telecommunication poles.

During the inspection process, the following data will be collected for use in analyzing the integrity of joint use poles. Based upon the significant length of time since the last joint use audit, strength and loading assessments will not be completed in this audit. The assessments will be conducted in the pole inspection program described above.

1. Pole Location (GPS information from mapping system)
2. Owner of the pole
3. City/County location
4. Pole type
5. Pole height
6. Pole class
7. Pole treatment
8. Date manufactured
9. Date Inspected (if known)
10. Date retreated (if known)
11. Joint use attachers (company name)
12. Type of joint use attachment
13. Violations
14. Miscellaneous Comments

The information collected in the audit will be compiled and handled in accordance with the specific joint use agreement for that attachment. Any dangerous conditions identified that could result in a failure of the pole will be addressed immediately. The cost to manage the joint use audit and attachment process will be approximately \$21,000 on an annual basis. The joint use audits will be conducted in accordance with the contracts for the third party attachers.

Data collected during the audit process will be analyzed in order to determine the number of poles found to be overloaded, the number of unauthorized joint use attachments and customer outages related to these situations.

2.3 Inspection Cycle of Transmission Structures

Transmission inspections will be completed on all transmission facilities and will include climbing patrols of the 138 KV and 69 KV transmission lines owned by FPUC. This inspection will ensure that all structures have a detailed inspection performed at a minimum of every six years. The inspection will include ninety five (95) 138 KV structures and two hundred two (202) 69 KV structures. Customer who own 60 KV transmission line structures connected to the FPUC will be strongly encouraged to complete a similar type inspection. Total cost to perform a complete inspection on all structures will be approximately \$110,000 (\$18,000 annually).

Transmission substation equipment will also be inspected annually to document the integrity of the facility and identify any deficiencies that require action.

The inspections will ensure that all transmission towers and other transmission line supporting equipment such as insulators, guying, grounding, conductor splicing, cross-braces, cross-arms, bolts, etc structurally sound and firmly attached. Similarly, all transmission substations will be inspected to ensure that all structures, buss work, insulators, grounding, bracing, bolts, etc are structurally sound and firmly attached.

Each inspection will be fully documented in order to provide information in accordance with FPSC guidelines and will reported annually.

2.4 Storm Hardening Activities for Transmission Structures.

FPUC's existing 138 KV system is constructed using concrete and steel poles or towers and generally comply with the new storm hardening requirements. This system will continue to be inspected as outlined above to ensure the integrity of the system.

FPUC's 69 KV system consist of a total of 212 poles of which 22 are concrete poles. All installations met the NESC code requirements at the time of construction. A policy of replacing all existing wood poles with concrete has been in place for some time. This policy requires that when it becomes necessary to replace a wood pole due to construction requirements or concerns with the integrity of the pole, a concrete pole meeting the current NESC requirements will be utilized.

In order to hasten the replacement of these poles, a fifteen year plan has been developed and is being proposed to replace the remainder of the wood poles with concrete poles meeting the NESC requirements. The plan will result in 190 poles being replaced over the period and will occur in equal amounts each year as much as is practical. Current cost for replacement of these facilities is approximately \$4,100,000. The selection of these poles will be based upon condition of the pole, proximity to the coast, critical infrastructure served, number of customers served and additional guying to meet requirements using current pole.

2.5 Geographic Information System (GIS)

FPUC has implemented a GIS mapping system in both divisions and will have the system completed and operational by September 2007. The UAI system is an ESRI based system using ArcGIS to identify the distribution and transmission facilities overlaid on a land base system. The system locates the facilities on the land base while allowing the ability to enter data on all physical assets within the system. The system also communicates with the Customer Information System to identify usage information and functions as a Customer Outage System that will allow for collection of outage information for use in determining reliability indices.

The GIS will be used as an integral part of the data collection in many of the programs mentioned in this document. This system will also collect information regarding joint use attachments which will provide additional information in conducting joint use audits. The total cost for the final installation of the GIS in NE Florida will be approximately \$200,000.

2.6 Post-Storm Data Collection and Forensic Analysis

FPUC will employ contractors to perform both the post-storm data collection and forensics analysis should a significant storm occur in either division. The contractors will be provided with system mapping information and requested to collect post-storm damage

information on areas as defined by the company. The areas will be selected in order to survey the areas in which the most damage occurs in order to gain the most information.

Damage will be identified so that the cause of the outage is identified as it relates to trees, wind, debris, conductor failure, pole failure, etc. which will be identified on the map. Depending upon the degree of damage, forensic analysis may be collected during this process. However, if the damage is extensive the forensics analysis will be performed as soon as possible after the post-storm data collection is completed.

Data collected during the collection process will be analyzed after completion of all storm related work has been completed. This analysis will summarize the type damage and failure modes of outages in order to determine methods to improve reliability in the future. The cost associated with this will vary widely dependant upon the degree of damage associated with the storm.

2.7 Outage Data for Overhead and Underground Systems

FPUC will continue to collect outage data for overhead and underground systems in order to evaluate the reliability indices associated with the two systems. The systems are in place for this type analysis and will be further improved with the installation of the automated Customer Outage system in NE FL during 2007.

2.8 Coordination with Local Governments

FPUC actively participates with local governments in planning for emergency situations and necessary communications are established for these situations. Past practice has not included having FPUC personnel at certain government locations at all times during an emergency situation. However, futures plans are to have personnel located at the county EOC's on a 24 hour basis in the future in order to ensure good communications. This will also allow for improved updating of outage information as the storm restoration occurs.

FPUC will also continue to cooperate with local governments in actively discussing both undergrounding and tree trimming issues as they arise. During 2007, improvements in communications with local governments in these areas have occurred. Involvement and discussion regarding both undergrounding and vegetation management issues have allowed for additional communication and education of both parties.

2.9 Collaborative Research

FPUC is currently participating with The Public Utility Research Center (PURC) as well as other investor owned, cooperative and municipal electric utilities in order to perform beneficial research regarding hurricane winds and storm surge within the state PURC has demonstrated the ability to lead and coordinate multiple groups in the research activity. FPUC will continue to support this effort but does not intend to conduct other type research at this time.

2.10 Disaster Preparedness and Recovery Plans

The primary objective of the Disaster Preparedness and Recovery Plan is to provide guidelines under which Florida Public Utilities Company will operate in emergency conditions. This information is contained with the Emergency Procedures that are updated on an annual basis. The following objectives are included to ensure orderly and efficient service restoration.

1. The safety of employees, contractors and the general public will have the highest priority.
2. Early damage assessment is required in order to develop manpower requirements.
3. Request additional manpower as soon as conditions and information indicate the need.
4. Provide for orderly restoration activities in order to provide efficient and rapid restoration.
5. Provide all logistical needs for employees and contractors.
6. Provide ongoing preparation of our employees, buildings, equipment and support function in advance of an emergency.
7. Provide support and additional resources for employees and their families should they need assistance to address injury or damage as a result of the emergency situation.

FPUC will utilize the plan to prepare for storms annually and will ensure all employees are aware of their responsibilities should the need arise. Based on the location of the storm, the division office in that area will be designated as the operations center and all restoration and logistical activities will be coordinated from that location. Restoration activities will be handled in the following manner:

1. During the early stages of the emergency, restoration will be handled in the usual manner. All service will be restored as soon as possible.
2. As the storm intensifies and trouble reaches major proportions, the main restoration activities will be limited to keeping main feeders energized by clearing trouble without making repairs.
3. When the intensity of the storm is such that work can no longer be done safely, all work will cease and personnel will report to the office or other safe locations.
4. When the storm has subsided to a reasonable level and it is safe to begin restoration activities damage assessment and restoration of main feeders to critical customers will begin.
5. Restoration activities will continue in an effort to restore service in the following manner:
 - a) Substations
 - b) Main feeders to critical customers
 - c) Other main feeders
 - d) Undamaged primary
 - e) Damaged primary, secondary, service, street lights, security lights

These guidelines are not intended to prevent responding to emergency situations. Any life threatening emergency will be handled immediately, in such a manner as to not endanger the lives of others.

Communication efforts with local governments, County EOC's and the media will be a key in ensuring a safe and efficient restoration effort. Key personnel will be designated as the media liaison and will ensure that communications regarding the status of the restoration activities are available on a scheduled basis.

3.0 Compliance with NESC Overhead Requirements

3.1 Distribution

FPUC distribution facilities have been installed in accordance with NESC requirements in effect at the time of installation. New specifications are being developed that will allow for certain future installations to exceed the NESC by utilizing the extreme wind loading standards.

3.2 Transmission

FPUC transmission facilities have been installed in accordance with NESC requirements in effect at the time of installation. A program is being proposed that will replace all remaining wood transmission poles with concrete poles that will meet or exceed the NESC extreme wind loading standards.

3.3 Substation

FPUC substation facilities have been installed in accordance with NESC requirements in effect at the time of installation. Recent removal of vegetation near a major transmission substation has also reduced the risk of wind blown debris. Efforts will continue to address other similar situations.

3.4 Extreme Wind Loading for Distribution Facilities

As required by commission order, FPUC has developed plans to begin incorporating the extreme wind loading standards shown in Figure 250-2(d) of the 2007 NESC code. These standards will be evaluated when new construction and major planned projects are being designed to determine the overall value and contribution to the reliability of the system. If it is determined through a cost benefit analysis that these standards are prudent in the design, they will be incorporated into the design.

The primary focus using the extreme wind loading standards is for distribution facilities along major highways and providing service to critical infrastructure such as hospitals, water plants and sewer treatment plants. Below is a list of projects under consideration for the 2007 – 2009 period.

<u>2007</u>	<u>Division</u>	<u>Critical Load</u>	<u>Feeder</u>	<u>Miles</u>	<u>Estimated Cost</u>
	Northwest	Prison/H.S. Shelter	#9932	0.5	\$62,500

2008	Division	Critical Load	Feeder	Miles	Estimated Cost
	Northwest	Sewer Treatment	#9992	1.1	\$141,600
	Northeast	Hospital	#209	1.2	\$154,500
2009	Division	Critical Load	Feeder	Miles	Estimated Cost
	Northwest	Prison/H.S. Shelter	#9932	3.2	\$424,360
	Northeast	Sewer Treatment	#214	0.6	\$79,600

4.0 Mitigation of Damage Due to Storm Surge and Flooding

FPUC is currently beginning the development of an expanded specifications book that will include details on mitigating damage of underground and overhead distribution and transmission facilities.

Transmission facilities are located only in the Northeast Florida Division. The transmission lines are constructed near and across coastal waterways and were originally designed to meet NESC requirements for these applications. Where necessary, foundations and casings were used stabilize the structures due to the soil conditions.

Overhead distribution lines in both divisions could be subject to storm surges and flooding. Lines located near the coast or inland rivers that are subject to storm surges or flooding will be evaluated and additional supporting mechanisms placed on them if needed and practical. This may include storm guys or pole bracing where necessary. The storm guys or bracing will be placed so that additional support is achieved perpendicular the distribution line. Should the affected lines include reclosers, capacitors or regulators that require electronic controls, the controls shall be mounted above maximum surge or flood levels.

Underground distribution lines that could be subject to storm surges and flooding are mainly located in the Northeast Florida Division. Based upon the significant amount of underground infrastructure in place, it is impractical to make a significant impact on what is installed. Current specifications include the use of pads that are placed approximately two feet into the ground that provide additional stability to the installation. Equipment can then be securely attached to the pad. At this time, underground distribution lines are placed in conduit but are not typically encased in concrete. Future installations of underground distribution feeders will be evaluated based on the location. Should a possibility exist that storm surges may impact these facilities, the installation will be evaluated and may be encased in concrete ducts if necessary.

5.0 Placement of New and Replacement Facilities

FPUC agrees that having facilities located in areas that are easily accessible and pursuant to Rule 25-6.0341, F.A.C. Facilities will be placed along public rights of way or located on private easements that are readily accessible from public streets. These requirements are necessary in order efficiently and safely perform all necessary installation and maintenance on those facilities. Placement of facilities along rear lot lines will not occur except in certain commercial applications where open access concrete/asphalt driveways are located at the rear of the development.

6.0 Deployment Strategy

6.1 Description of Facilities Affected

During the deployment of storm hardening strategy, many changes will be instituted that may have an impact on future storm restoration activities. The changes have been developed; however, the detail specifications and necessary engineering review have not been completed. The technical detail is yet to be developed and is not available for inclusion in this document.

As previously mentioned, these initiatives should be implemented on or before May 2008. The significant areas of implementation are as follows:

1. Wood poles will be inspected so that all poles are inspected at least every eight years.
2. Vegetation management activities will be increased in order to trim main feeders every three years, laterals every six years and danger trees will be addressed and removed as possible.
3. Joint use audits will be conducted in an effort to identify pole loading issues. These audits will be conducted once every five years. Additional detailed inspection of pole loading will be completed in conjunction with the wood pole inspection program.
4. Detailed climbing inspections on all transmission line will be conducted so all poles are inspected at least once every six years.
5. A plan has been developed to begin the replacement of all wood transmission structures and will be completed over a fifteen year cycle.
6. A plan has been developed to begin rebuilding distribution lines to critical infrastructure incorporating the extreme wind loading criteria into the design of these systems. The details of this are shown in Section 4.4 above.
7. As new specifications are developed for underground facilities, consideration will be given to techniques that will mitigate damage for storm surges and floods.
8. FPUC will continue the current practice of attempting to place facilities on public rights of way and will ensure private easements are secured if this is not possible.

6.2 Communities and Areas Affected by Electric Infrastructure Improvements

The majority of the items listed in 6.1, Description of Facilities Affected, will affect all areas of the FPUC service territory. The intent is to ensure all areas benefit from these strategies over the term of the work. The transmission line inspections and pole replacement programs will only affect the Northeast Florida Division since there are no transmission facilities in the Northwest Florida Division. The distribution line rebuilding to comply with the NESC extreme wind loading standards will equally benefit both divisions. It should also be noted that the Hospital located in the Northwest Florida division was not included in the current plan due to the possibility of relocation in the near future. The situation will be monitored and will be reevaluated after the final decision is made on the location of the Hospital.

6.3 Upgrading of Joint Use Facilities

FPUC currently proposes that several projects be considered for 2007 – 2009 time period that are intended to upgrade existing facilities to critical infrastructure. It is anticipated that a

significant portion of the poles upgraded will have one or more joint use attachments. Below are the current projects and the estimated number of poles included.

2007	Division	Critical Load	Feeder	Miles	Pole Est.
	Northwest	Prison/H.S. Shelter	#9932	0.5	18
2008	Division	Critical Load	Feeder	Miles	Pole Est.
	Northwest	Sewer Treatment	#9992	1.1	39
	Northeast	Hospital	#209	1.2	43
2009	Division	Critical Load	Feeder	Miles	Pole Est.
	Northwest	Prison/H.S. Shelter	#9932	3.2	113
	Northeast	Sewer Treatment	#214	0.6	22

During the design phase of these projects, the NESC extreme wind loading standards will be applied to all poles to be installed and will include all joint use attachments. Current contract language for the joint use attachers involved will be used as a guide for this rebuilding process.

6.4 Estimated Cost and Benefits

Below are shown the items and the associated cost during the 2007 – 2009 time period. Each item should have an impact on the reliability and restoration during storms as well as the normal reliability indices. As previously mentioned, FPUC does not have the supporting data to develop the benefits analysis for these programs. However, as these programs are implemented, data will be collected that can be used in the future to develop the associated benefits.

Item	Description	2007	2008	2009	Comments
1.0	Pole Inspections	\$220,000	\$227,000	\$233,000	3050 poles/year
2.1	Vegetation Management	\$352,000	\$363,000	\$374,000	
2.2	Joint Use Audits	\$21,000	\$21,500	\$22,000	
2.3	Transmission Inspections	\$18,000	\$18,500	\$19,000	
2.4	Trans. Storm Hardening	\$0	\$285,950	\$300,000	
2.5	GIS	\$200,000	\$4,000	\$4,000	
2.6	Post Storm Forensics	Unknown	Unknown	Unknown	Dependant on Storm
2.7	OH/UG Data	N/A	N/A	N/A	No Incremental Cost
2.8	Coordination Local Govt.	\$10,000	\$10,000	\$10,000	
2.9	Collaborative Research	\$10,000	\$10,000	\$10,000	
2.10	Disaster Preparedness	N/A	N/A	N/A	No Incremental Cost
3.4	Extreme Wind Loading	\$62,500	\$296,000	\$503,960	Distribution Upgrade

7.0 Joint Use Impacts

7.1 Wood Pole Inspections

During the wood pole inspection process, FPUC will need to develop an agreement with two telecommunications companies on how the inspection process will be handled for the joint use poles owned by the telecommunications company. The wood pole inspection process will evaluate the structural soundness of existing poles and perform strength and load test.

Documentation will be developed on poles that do not meet the current requirements and corrective actions scheduled.

Based on past experience it anticipated that approximately 200 joint use poles will be identified annually that need to be replaced. Although it is possible to consider additional bracing for certain poles, most will require replacement. As this occurs, the current contacts with the joint use parties will be utilized to develop the procedures for the replacement and transfer of necessary attachments.

7.2 Joint Use Audits

Joint use audits will be scheduled with all joint users in order to determine attachment amounts and to identify possible loading issues that need to be addressed. All parties should be available for participation in the audits in accordance with the joint use agreements. Due to the length of time since the last audit, it is important that all parties participate.

7.3 Attachment Standards and Procedures

FPUC currently has contracts with each third party attacher that contains the Attachment Standards and Procedures. These contracts will continue in effect and will govern the standards and procedures at this time. As previously mentioned, additional construction specifications will be developed that can be used in conjunction with the contracts. As the additional specifications are developed, third party attachers will have the ability to provide input into the new specifications. Attached to this document are the current Joint Use Attachment Specifications.

7.4 Soliciting Input from Third Party Attachers

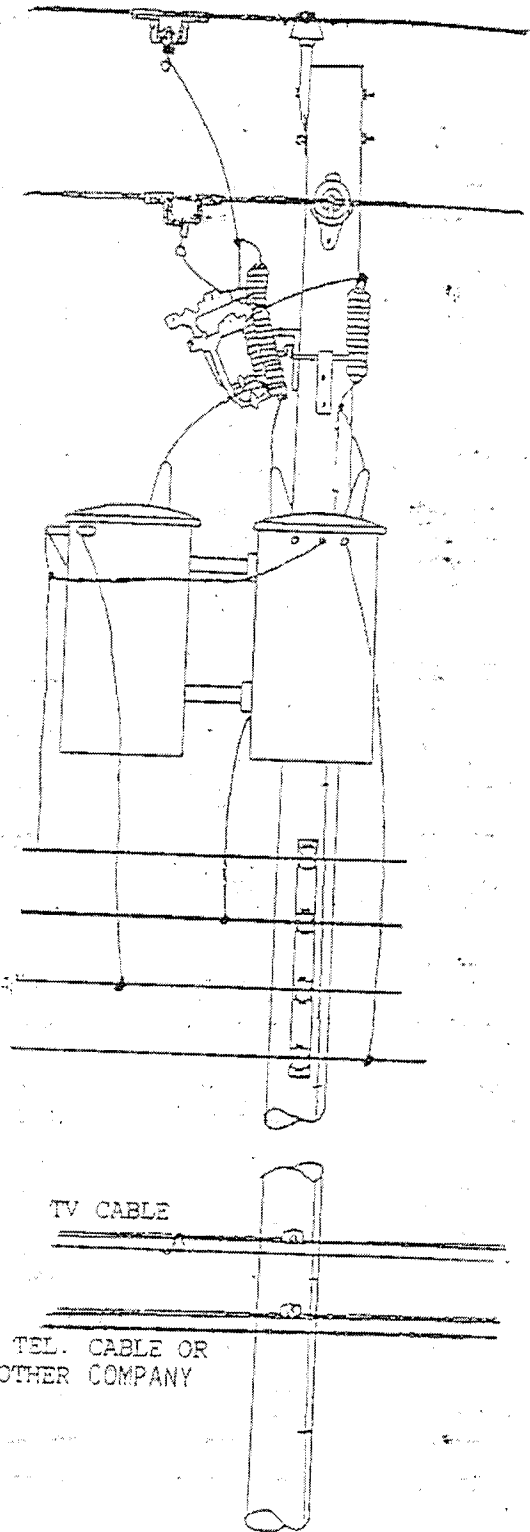
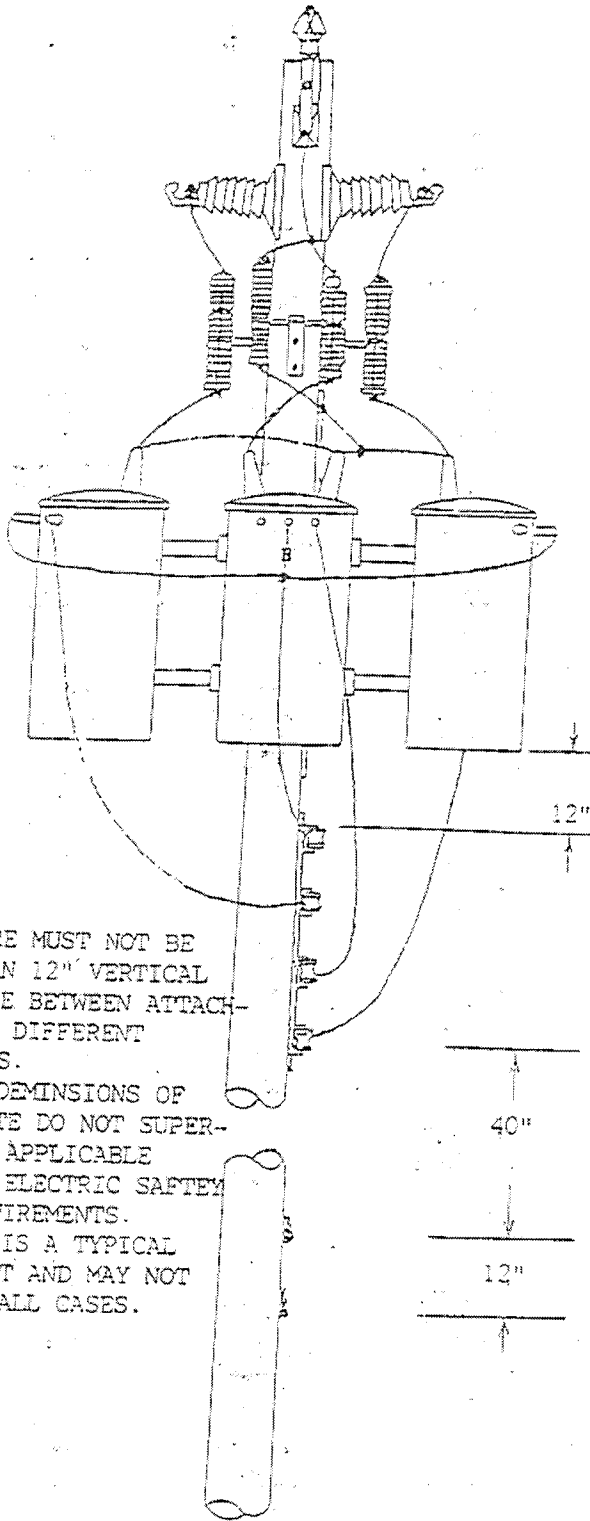
FPUC sent notification to the following third party attachers on June 24, 2007 concerning the Storm Hardening Plan for the years 2007 – 2009. As of July 3, 2007, and possibly as a result of the short notice period, no information has been received from third party attachers. The following attachers were notified.

- Florida Cable Telecommunications Association (FCTA)
- Bellsouth
- Embarq

As information is received from third party attachers regarding this plan, the information will be assembled forwarded to the appropriate parties.

7.5 Estimate of Costs and Benefits from Third Party Attachers

The estimate of costs and benefits from third party attachers will be forwarded after receipt from third party attachers.



NOTES:

- (1) THERE MUST NOT BE LESS THAN 12" VERTICAL CLEARANCE BETWEEN ATTACHMENTS OF DIFFERENT COMPANIES.
- (2) THE DIMENSIONS OF THIS PLATE DO NOT SUPERSEDE ANY APPLICABLE NATIONAL ELECTRIC SAFETY CODE REQUIREMENTS.
- (3) THIS IS A TYPICAL ATTACHMENT AND MAY NOT APPLY IN ALL CASES.

Florida Public Utilities Company
 Marianna Division
 STANDARDS

References

dwg. no.

approved by

date

12-29-87

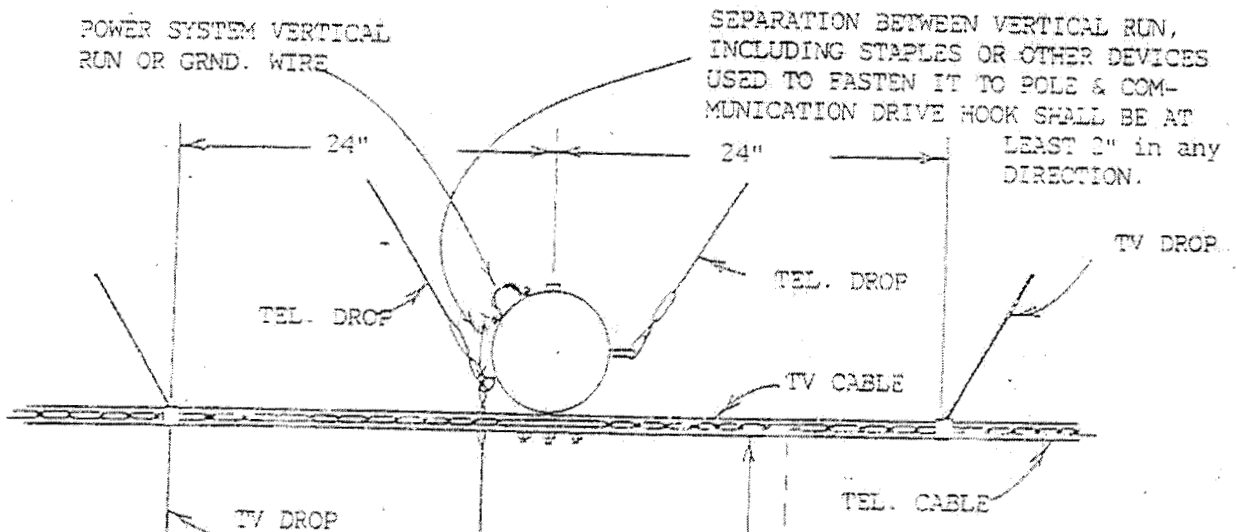
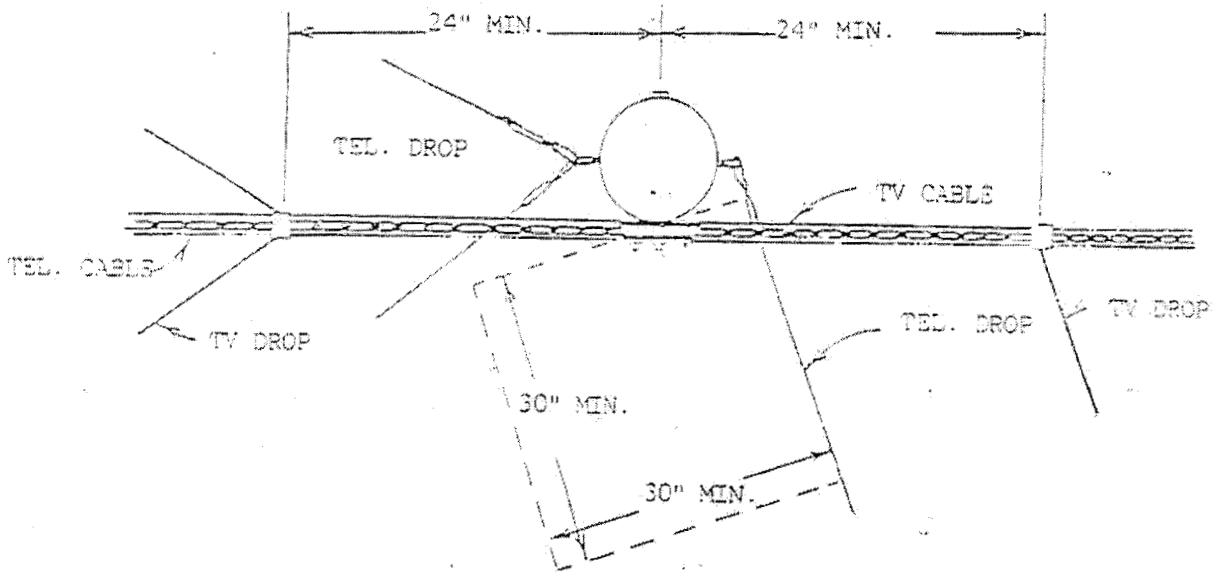
drawn by

B. O'PRY

revised

Supersedes

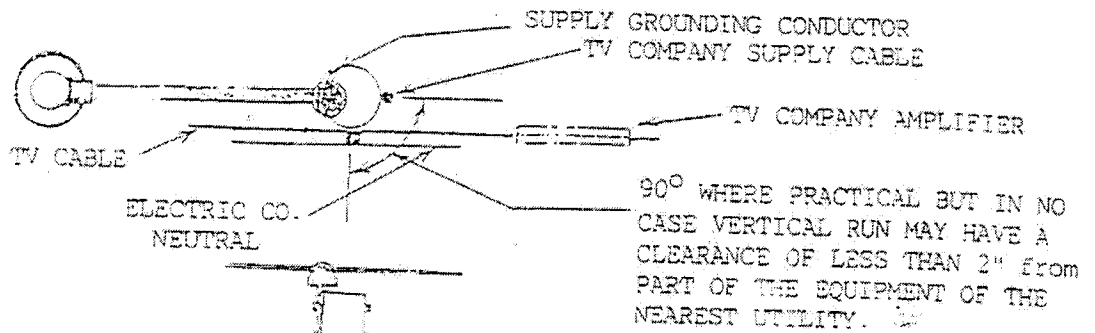
T CAL COMPANY ATTACHMENT TO FPU POLE



- NOTES:
- (1) THE DEMINSIONS OF THIS PLATE DO NOT SUPERSEDE ANY APPLICABLE NATIONAL ELECTRIC SAFTEY CODE REQUIREMENTS.
 - (2) THIS IS A TYPICAL ATTACHMENT AND MAY NOT APPLY IN ALL CASES.
 - (3) THERE MUST NOT BE LESS THAN .12" CLEARANCE BETWEEN ATTACHMENTS OF DIFFERENT COMPANIES.

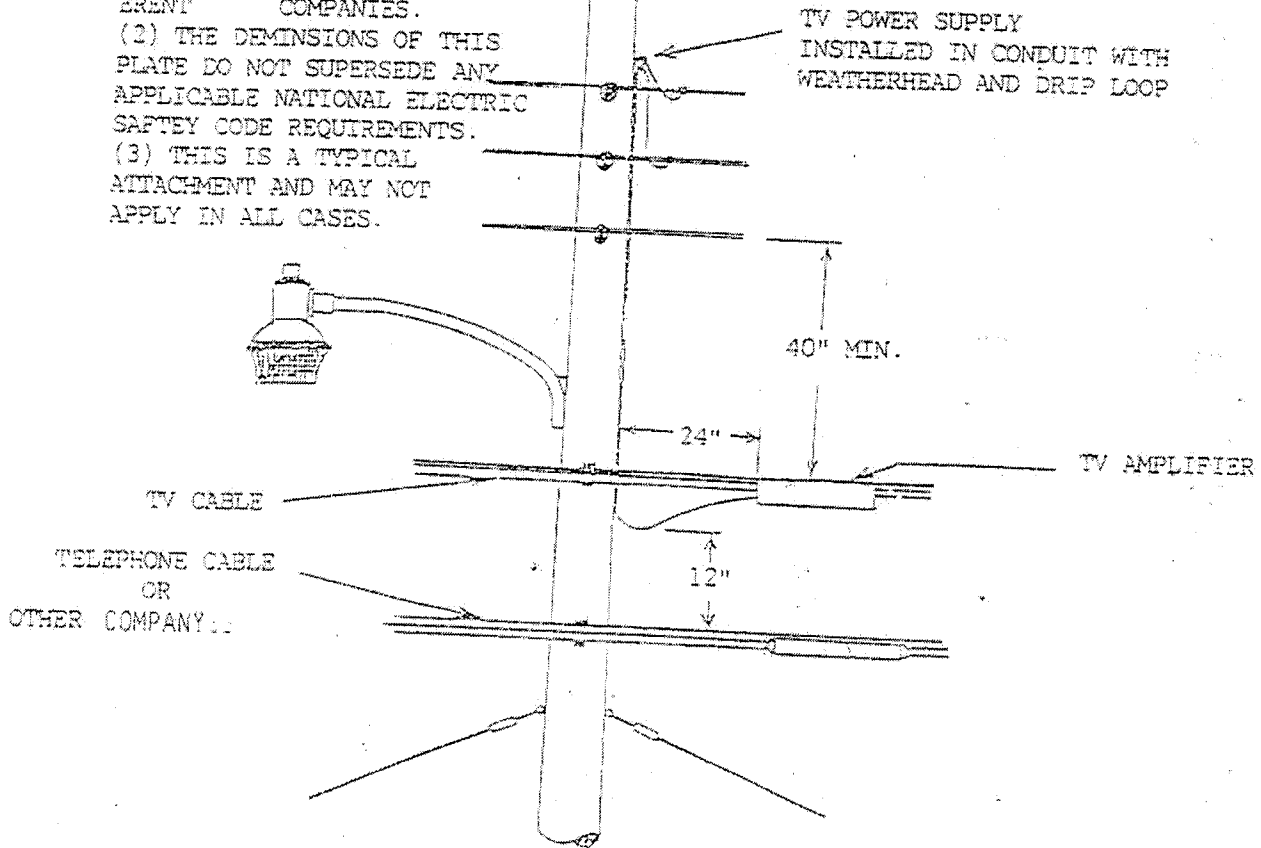
<p>Florida Public Utilities Company Marianna Division STANDARDS</p>	<p>References</p>	<p>dwc. no.</p>	<p>approved by _____ date 12-29-87 drawn by B. O'PRY revised _____ Supersede</p>
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TYPICAL CO. ATTACHMENT TO FPU CO POLE



NOTES:

- (1) THERE MUST NOT BE LESS THAN 12" VERTICAL CLEARANCE BETWEEN ATTACHMENTS OF DIFFERENT COMPANIES.
- (2) THE DIMENSIONS OF THIS PLATE DO NOT SUPERSEDE ANY APPLICABLE NATIONAL ELECTRIC SAFETY CODE REQUIREMENTS.
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 Marianna Division
 STANDARDS

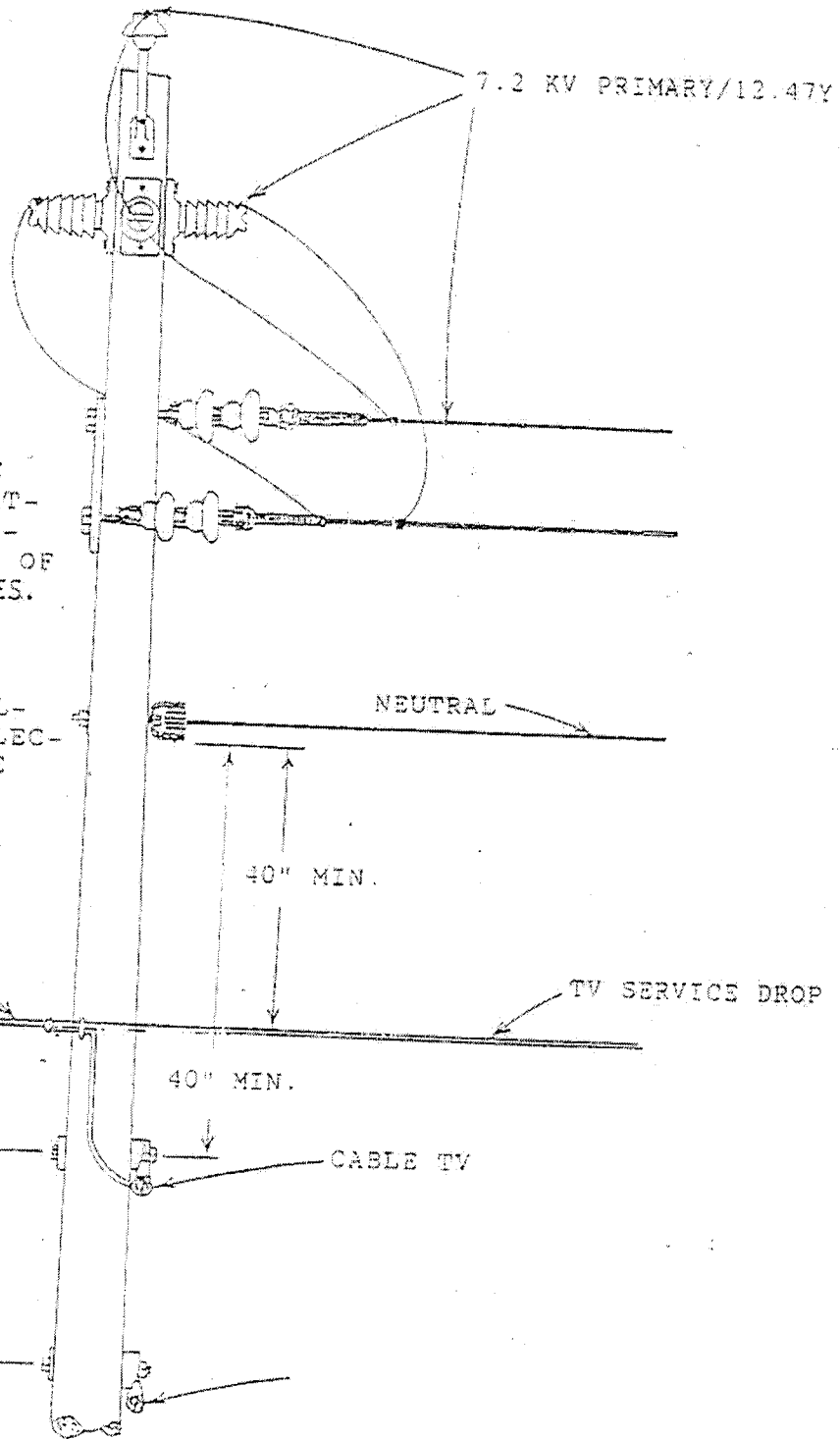
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dwg. no.

approved by _____
 date 12-29-67
 drawn by B. O'PRY
 revised _____

Supersedes

TYF AL CO. ATTACHMENT TO FPU POLE



NOTES:

- (1) THERE MUST NOT BE LESS THAN 12" VERTICAL CLEARANCE BETWEEN ATTACHMENTS OF DIFFERENT COMPANIES.
- (2) THE DIMENSIONS OF THIS PLATE DO NOT SUPERSEDE ANY APPLICABLE NATIONAL ELECTRICAL SAFETY CODE REQUIREMENTS.
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 STANDARDS

References

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 date

12-29-87

drawn by
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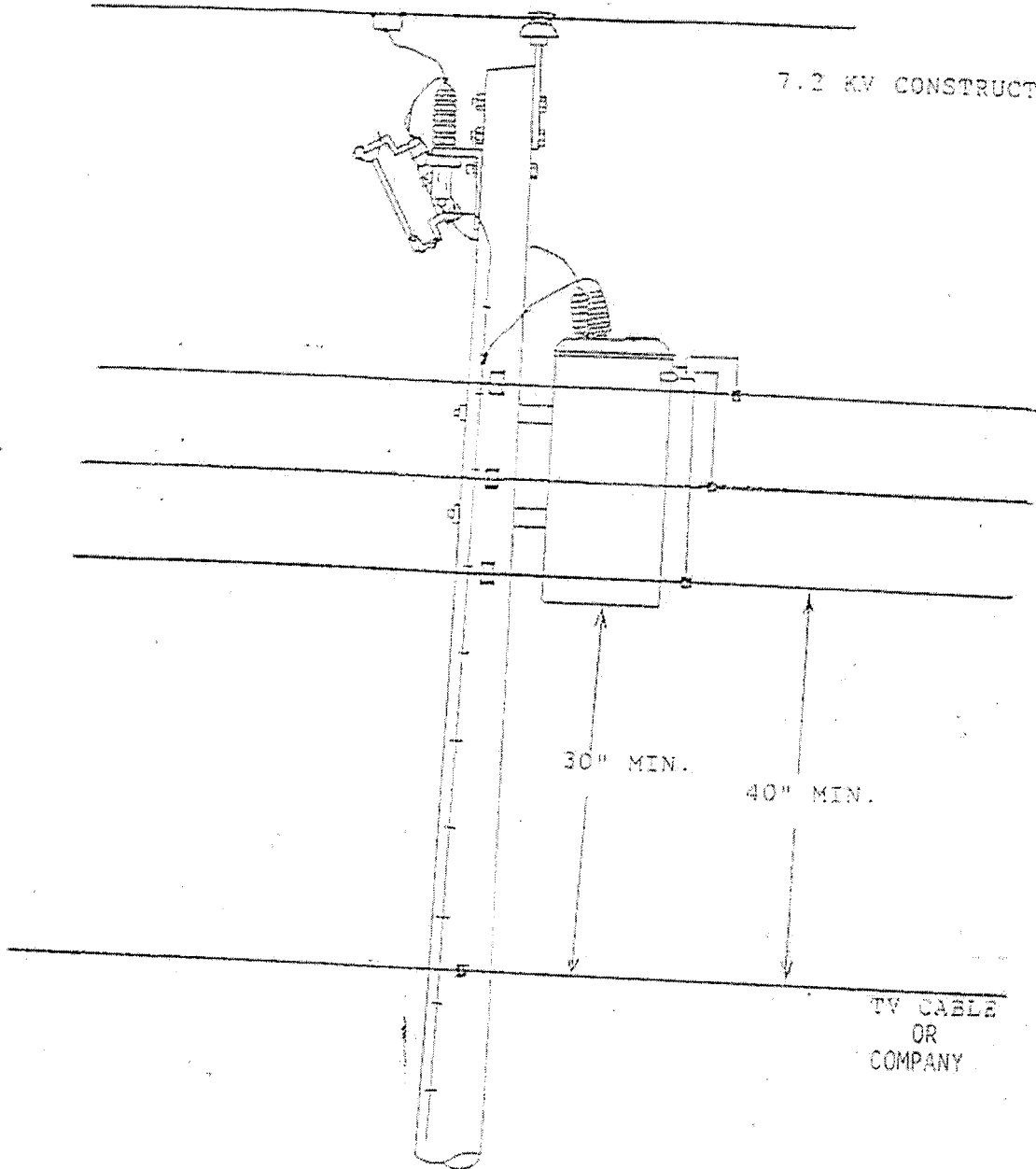
B. O'PRY

Supersedes

GENERAL RULES & SPECIFICATIONS FOR JOINT USE OF FACILITIES

TYI PAL CO. ATTACHMENT TO FPU POLE
 SINGLE TRANSFORMER INSTALLATION

7.2 KV CONSTRUCTION



TV CABLE
 OR
 COMPANY

NOTES:

- (1) THERE MUST NOT BE LESS THAN 12" VERTICAL CLEARANCE BETWEEN ATTACHMENTS OF DIFFERENT COMPANIES.
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Florida Public Utilities Company
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References

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12-29-87.

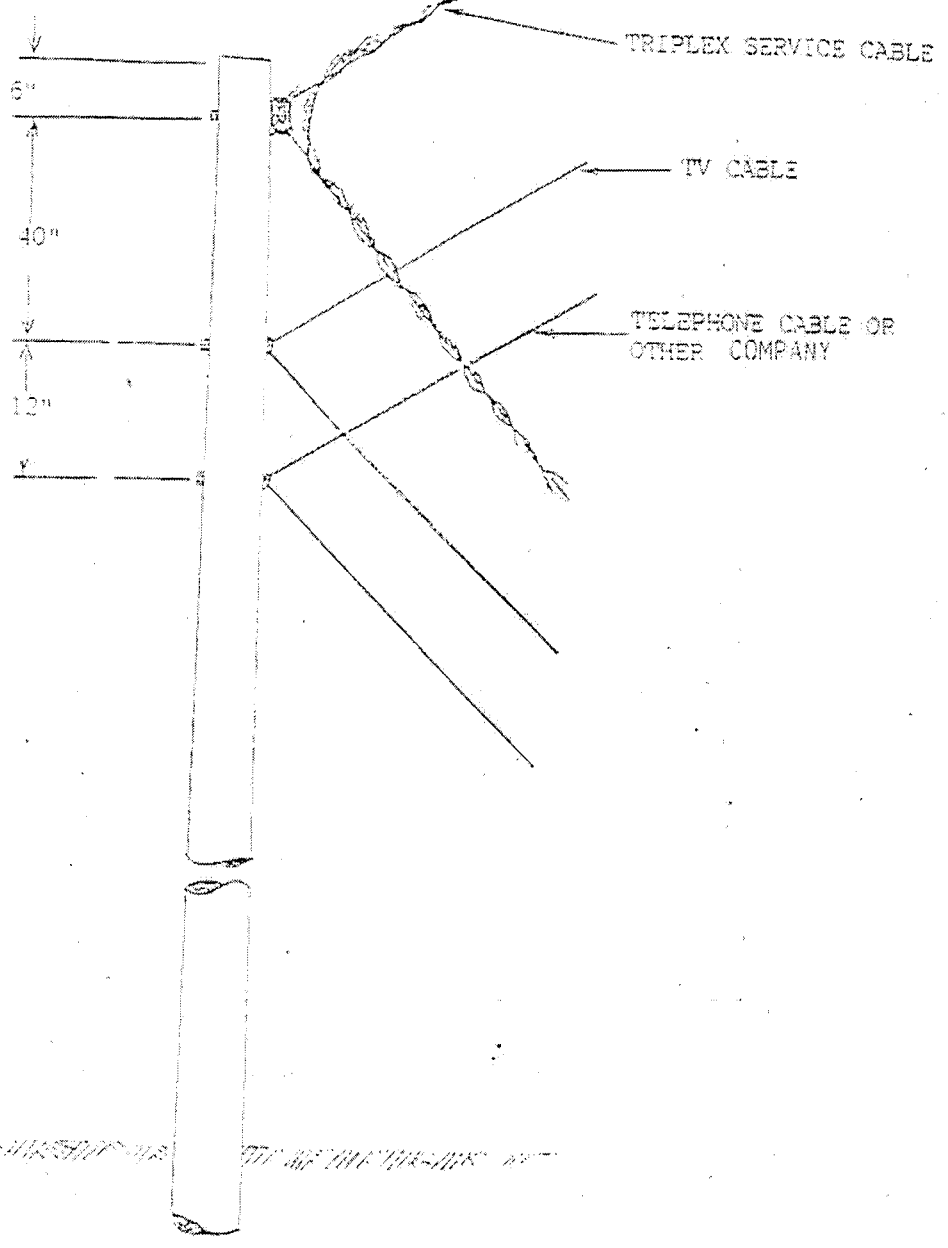
drawn by

B. O'PRY

revised

Supersedes

TYPICAL COMPANY ATTACHMENT TO FPL CO POLE



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NOTES:

- (1) THERE MUST NOT BE LESS THAN 12" VERTICAL CLEARANCE BETWEEN ATTACHMENTS OF DIFFERENT COMPANIES.
- (2) THE DIMENSIONS OF THIS PLATE DO NOT SUPERSEDE ANY APPLICABLE NATIONAL ELECTRIC SAFETY CODE REQUIREMENTS.
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Florida Public Utilities Company
 Marianna Division
 STANDARDS

References	dwg. no.	approved by	12-29-87
		date	
		drawn by	B. O'BRY
		revised	
		superseded	

ATTACHMENT OF TV DISTRIBUTION

SYSTEM TO POLES

ADDITIONAL REQUIREMENTS

1. Clearance to ground as per National Electrical Safety Code:
 - 20' minimum over streets or alleys
 - 27' minimum over railroad tracks
2. Attachment of telephone and television facilities to be on same side of pole.
3. Metal case on amplifier and terminal boxes and metal case of service switch to be effectively grounded.
4. No amplifiers, distribution terminals and/or fused disconnect switches may be mounted directly to pole, but shall be installed upon a suitable crossarm in approved manner.
5. Telephone and television contacts shall maintain same relative position on poles.
6. Underground cable risers shall be installed on road quarter of pole but shall not conflict with telephone attachments.
7. No amplifier, distribution terminal or fused disconnect switch to be installed upon transformer poles.

FLORIDA PUBLIC UTILITIES
COMPANY

By _____

EXHIBIT V