

**Ruth Nettles**

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**Sent:** Wednesday, July 11, 2007 3:05 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Browne, Maria  
**Subject:** FCTA's Initial Issues List for E-Filing  
**Attachments:** FCTA's Initial Issues List.doc

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1. The full name, address, telephone number, and e-mail address of the person responsible for the electronic filing  
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2. The docket number and title if filed in an existing docket: 070297-EI, 070298-EI, 070299-EI, and 070301-EI
3. The name of the party on whose behalf the document is filed: Florida Cable Television Association
4. The total number of pages in each attached document : 29 pages
5. A brief but complete description of each attached document: Florida Cable Television Association's Initial List of Issues and Areas of Concern, as requested by Staff at the June 27, 2007 Workshop conducted for Dockets: 070297-EI, 070298-EI, 070299-EI, and 070301-EI.

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July 11, 2007

### VIA ELECTRONIC FILING

Ms. 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, Florida Administrative Code, submitted by Tampa Electric Company  
**Docket No. 070298-EI** -Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, Florida Administrative Code, submitted by Progress Energy Florida, Inc.  
**Docket No. 070299-EI** -Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, Florida Administrative Code, submitted by Gulf Power Company.  
**Docket No. 070301-EI** - Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, Florida Administrative Code, submitted by Florida Power and Light Company

Dear Ms. Cole:

Enclosed for filing in each of the above-referenced Dockets, please find the Florida Cable Telecommunications Association Inc.'s initial list of Issues and Areas of Concern, as requested by Staff at the June 27, 2007, Workshop conducted in each of these Dockets.

July 11, 2007  
Ms. Ann Cole  
Commission Clerk  
Florida Public Service Commission  
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Your assistance in this matter is greatly appreciated. Should you have any questions, please don't hesitate to contact me.

Sincerely,

/s/ Maria T. Browne  
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cc: Beth Keating, Akerman Senterfitt  
Mickey Harrelson

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the Florida Telecommunications Association's Positions has been provided via Electronic Mail and/or US First Class Regular Mail to the persons listed below this 11th day of July, 2007:

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**Electric Infrastructure Storm Hardening  
Issues and Areas of Concern**

**1. Plan Content**

**1.1 Compliance with National Electrical Safety Code**

	<b>Preliminary Position</b>
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The Plan complies.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The Plan complies.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The Plan complies.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The Plan complies.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

1.2.A Extreme wind loading standards - New distribution facilities

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The plan exceeds requirements. It is not prudent, practical or cost effective. <i>See</i> Comments of the Florida Cable Telecommunications Association, Inc. Regarding Florida Power and Light Company's Infrastructure Storm Hardening Plan Filed in Compliance with Rule 25-6.0342, Florida Administrative Code in Docket No. 070301-EI, May 30, 2007 (hereinafter "FCTA FPL Comments") at 10-16.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports PEF's plan (Grade C for new construction) and its plan to "analyze the extreme wind standard along with other grades of distribution construction by using its Asset Investment Strategy model for implementation purposes in selected locations" i.e., limited pilot projects. <i>See</i> Comments of the Florida Cable Telecommunications Association, Inc. Regarding Progress Energy Florida, Inc.'s Infrastructure Storm Hardening Plan Filed in Compliance with Rule 25-6.0342, Florida Administrative Code in Docket No. 070298-EI, May 30, 2007 (hereinafter "FCTA PEF Comments") at 11-17.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA does not oppose TECO's using Grade B for new lines provided the incremental cost difference is reasonable. FCTA does not support, and it does not appear that TECO's Plan provides for, replacing sound poles built to Grade C construction with poles meeting Grade B construction. In addition, as set forth below, TECO should provide additional information about the incremental cost difference for building to Grade B. <i>See</i> Comments of the Florida Cable Telecommunications Association, Inc. Regarding Tampa Electric Company's 2007 Storm Hardening Plan Filed in Response to Commission Staff's Request for Comments filed in Docket No. 070297-EI, May 30, 2007 (hereinafter "FCTA TECO Comments") at 10-15.
MUUC	
Time Warner	

Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports Gulf plan as we understand it --Grade C for new construction and limited extreme wind pilot projects. <i>See</i> Comments of the Florida Cable Telecommunications Association, Inc. Regarding Gulf Power Company's 2007 Storm Hardening Plan Filed in Response to Commission Staff's Request for Comments filed in Docket No. 070299-EI, May 30, 2007 (hereinafter "FCTA Gulf Comments") at 9-15.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	



1.2.B Extreme wind loading standards - Major planned expansion, rebuild, or relocation of distribution facilities

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The plan exceeds requirements. It is not prudent, practical or cost effective. <i>See FCTA FPL Comments at 10-16.</i>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports PEF plan (Grade C) and its plan to “analyze the extreme wind standard along with other grades of distribution construction by using its Asset Investment Strategy model for implementation purposes in selected locations” i.e., limited extreme wind pilot projects. <i>See FCTA PEF Comments at 11-17.</i>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA does not oppose TECO’s using Grade B for new lines provided the incremental cost difference is reasonable. FCTA does not support, and it does not appear that TECO’s Plan provides for, replacing sound poles built to Grade C construction with poles meeting Grade B construction. In addition, as set forth below, TECO should provide additional information about the incremental cost difference for building to Grade B. <i>See FCTA TECO Comments at 10-15.</i>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports Gulf plan as we understand it --Grade C for new construction – and limited extreme wind pilot projects. <i>See FCTA Gulf Comments at 9-15.</i>

MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

1.2.C Extreme wind loading standards - Critical infrastructure and major thoroughfares

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The FPL plan exceeds requirements. Engineering guidelines for proposed projects result in exceeding even extreme wind design standards. Additionally, the FPL Plan may unnecessarily increase the number of pole replacements. FPL plans to harden all Interstate and Turnpike crossings utilizing storm guying where practical. FCTA supports this part of the plan. <i>See FCTA FPL Comments at 10-16.</i>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports pilot projects with wind speed measurement devices. PEF plans to harden 18 Interstate, Turnpike or major thoroughfare crossings by converting them to underground. FCTA suggests that storm guying be utilized in lieu of undergrounding where practical. FCTA supports hardening Interstate and Turnpike crossings. <i>See FCTA PEF Comments at 11-17.</i>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports pilot projects with wind speed measurement devices. TECO plans to convert overhead Interstate crossings to underground. FCTA supports hardening Interstate crossings but suggests utilization of storm guying as more cost effective where practical. <i>See FCTA TECO Comments at 10-15.</i>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	

Verizon	
FCTA	FCTA supports pilot projects with wind speed measurement devices. Gulf Power plans to harden Interstate crossings but did not state how they will be hardened. FCTA supports hardening Interstate crossings by utilizing storm guying where practical. <i>See</i> FCTA Gulf Comments at 9-15.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

1.3 Mitigation of damage to underground and supporting overhead distribution facilities due to flooding and storm damage

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA does not object based on information provided.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA does not object based on information provided.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA does not object based on information provided.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA does not object based on information provided.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

1.4 Placement of new and replacement distribution facilities to facilitate safe and efficient access (Rule 25-6.0341)

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports placement in public rights of way where practical.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports placement in public rights of way where practical.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports placement in public rights of way where practical.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports placement in public rights of way where practical.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

**2.0 Deployment strategy**

**2.1 Description of facilities affected**

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The plan exceeds requirements. It is not prudent, practical and cost effective. See FCTA FPL Comments at 10-16.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports the plan as we understand it. The PEF evaluation of various storm hardening options utilizing the "AIS" model is especially useful.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA does not oppose TECO's continued transition to Grade B for new distribution and poles that otherwise need to be replaced subject to more discussion regarding FCTA concerns.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA supports the plan as we understand it.
MUUC	
Time Warner	
Town of Jupiter Island	

Town of Palm Beach	
NAWPC	



2.2 Communities and areas where electric infrastructure improvements are to be made

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The plan has defined areas for extreme wind and good detail for 2007 projects locations.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The plan has good detail for project locations.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The plan has good detail for project locations.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	The plan has good detail for project locations.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

2.3 Utility's definition of critical infrastructure and major thoroughfares

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	No opinion at this time.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	No opinion at this time.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	No opinion at this time.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	No opinion at this time.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

2.4.A Estimate of costs and benefits - Electric utility

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FPL estimates the costs for the first year of its plan implementation to be \$40 to \$70 million. It states that it has not yet finalized its plans for 2008 and 2009, but that its preliminary plans are to harden an additional 80 to 150 feeders at a cost of \$75 to \$125 million for 2008, and \$100 to \$150 million for 2009. With respect to benefits of its hardening plans, FPL states that "it is impossible at this time to estimate the full extent of the benefits with any precision" and "there is presently limited or no historical data available for purposed of conducting overall cost/benefit analyses on many of these new actions." First, the plan details for years 2008 and 2009 are not finalized, and thus any cost benefit analysis for these years would be premature. Second, the ranges of estimates are too broad for FCTA to be useful. Third, FPL does not tie specific amounts to specific projects or explain what portion of these costs will be incurred on poles with cable attachments and thus cannot be used by third parties to effectively gauge the cost benefits to them. It would be helpful to have more details about the estimated costs including if possible an estimate of the incremental costs per mile, the incremental cost associated with increases in pole replacements, and the percentage of plant with third party attachments impacted by these costs. Finally, FCTA agrees with FPL that FPL does not have any statistical data to support its current hardening approach and that therefore, FCTA believes that EWL should be analyzed on pilot project basis. <i>See also</i> FCTA FPL Comments.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	Page 21 of PEF's May 7, 2007 Plan lists total Hardening and Maintenance costs of \$91,017,904 for 2007. Distribution Hardening Projects constitute \$10,610,000 of the total amount. The remaining costs are for activities that do not fall within this docket (Vegetation Management, Joint Use Pole Inspection Audit, Transmission Pole Inspections, Other Transmission Inspections and Maintenance, Transmission Hardening Projects, Distribution Pole Inspections) but should be considered as part of the overall cost impact on PEF and attaching entities. PEF does not provide additional detail about the \$10,610,000 allocated to Distribution Hardening Projects or provide the percentage of this amount that will apply to poles with third party attachments. Nor does it provide cost estimates for Distribution Hardening Projects for years 2 and 3 of the Plan. Without additional detail as to year 1 or any information as to years 2 and 3, it is impossible for FCTA to state a position as to the amount estimated at this time. It would be helpful to have more details about these costs including, if possible, an estimate of the incremental costs per mile, the incremental cost associated with increases in pole replacements, and the percentage of plant with third party attachments impacted by these costs.

	If a prudent, practical and cost-effective plan is adopted, PEF will realize some benefit in the form of reduced storm restoration costs and outages. FCTA strongly believes that limited pilot projects are necessary to better inform the cost benefit analysis.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	<p>TECO states that in 2007, as a result of its storm hardening efforts, it will replace an estimated 1,420 distribution poles at a total cost of \$3.3 million. TECO Plan at p. 28. It also provides estimates of \$5,750,000 and \$6,040,000 for pole replacements in 2008 and 2009 respectively, and estimates for pole reinforcements of \$1,004,000 in 2007, \$894,000 in 2008 and \$920,000 in 2009. Plan at 41. It would be helpful to have more details about these costs including if possible an estimate of the incremental costs per mile, the incremental cost associated with increases in pole replacements, and the percentage of plant with third party attachments impacted by these costs.</p> <p>For specific Extreme Wind Pilot Projects, TECO estimates: \$760,00 in 2007, \$120,000 in 2008 and \$240,000 in 2009 for a total of \$1,120,000 for the Port of Tampa project; and \$190,000 for the Saint Joseph's Hospital project. It would be helpful to have more details about these costs including if possible an estimate of the incremental costs per mile and the percentage of plant with third party attachments impacted by these costs.</p> <p>For specific Storm Hardening Initiative Projects, TECO estimates \$60,000 for the Downtown Network; \$618,000 for the Tampa International Airport; \$582,000 for the conversion of remaining 4kV distribution circuits;\$600,000 for under-grounding 12 interstate distribution line crossings. It would be helpful to have more details about these costs including if possible an estimate of the incremental costs per mile and the percentage of plant with third party attachments impacted by these costs.</p> <p>TECO also provides estimates for certain projects that will likely have less impact on attaching entities including \$610,000 for transmission pole inspections; \$21,084,000 for transmission pole replacements; and \$2,325,000 for substation enhancements.</p> <p>Other costs for which TECO provides estimates are not at issue in this proceeding but should be considered in assessing the overall cost to pole owners and attachers including distribution pole inspections (\$1,627,000 in 2007, \$2,074,000 in 2008, and \$2,136,000 in 2009) and vegetation management (\$9,300,000 in 2007, \$9,600,000 in 2008 and \$9,900,000 in 2009).</p> <p>If a prudent, practical and cost-effective plan is adopted, TECO will realize some benefit in the form of reduced storm restoration costs and outages. FCTA strongly believes that limited pilot projects are necessary to better inform the cost benefit analysis.</p>
MUUC	
Time Warner	
Town of Jupiter Island	

Town of Palm Beach	
NAWPC	
	<b>Preliminary Position</b>
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	<p>Gulf's summary of estimated incremental costs and benefits is set forth at Appendix 8 of its Plan. Gulf estimates its incremental costs for extreme wind loading standards for Distribution to be \$523,610 for 2007, \$499,229 for 2008 and \$563,479 for 2009 – a total of \$1,586,398. It estimates the incremental costs associated with strengthening its feeder patrols to be \$100,000 per year for 2007 – 2009 for a total of \$300,000. And, it estimates the cost of wind monitors to be \$43,000 for 2007, \$36,000 for 2008 and \$45,000 for 2009 – for a total of \$124,000.<sup>1</sup> It would be helpful to have more details about these costs including if possible an estimate of the incremental costs per mile, the incremental cost associated specifically with increases in pole replacements, and the percentage of plant with third party attachments impacted by these costs.</p> <p>Gulf states that the benefit of its proposed plan is unknown at this time. FCTA agrees and advocates in favor of a pilot project approach for storm hardening.</p>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

<sup>1</sup> Other costs for which Gulf provides estimates are either not at issue in this proceeding (Three Year Vegetation Cycle, Joint Use Pole Attachment Audits, Geographic Information System, Collaborative Research, Wood Pole Inspection) or Gulf predicts no additional incremental costs.

2.4.B Estimate of costs and benefits - Third-party attachers

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	<p>FCTA does not yet have enough information about the costs and benefits of FPL's storm hardening plan to provide a specific estimate of the costs and benefits that FPL's plan will have on its cable operator members. However, the costs that may be recovered from cable operators are tightly prescribed by the FCC. Under the federal scheme, FCTA members pay both makeready costs – i.e., the cost of making the pole ready for its attachments (including the cost of rearranging existing facilities on the pole, guying the pole to increase strength, or replacing the pole where necessary) and annual rent pursuant to the FCC's rate formula, which assures that pole owners receive the fully allocated costs of accommodating the attachment. The annual pole attachment rent is determined by multiplying the percentage of the total usable space occupied by the pole attachment by the sum of the operating expenses and actual capital costs of the utility attributable to the entire pole. In addition, depending upon the circumstances, cable operators may incur the cost of transferring their facilities to a new pole.</p> <p>If a prudent, practical and cost-effective plan that includes improved coordination among pole owners and attachers is adopted, FCTA members will realize some benefit in the form of reduced storm restoration costs and outages. FCTA strongly believes that limited pilot projects are necessary to better inform the cost benefit analysis.</p> <p>Thus, while it is not possible at this time to predict with certainty what the cost impact of FPL's Plan to cable operators will be, it is clear cable operators likely will incur increased costs from storm hardening in the form of increased pole attachment rent, increased make-ready costs and increased transfer costs.</p>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	<p>FCTA does not yet have enough information about the costs and benefits of PEF's storm hardening plan to provide a specific estimate of the costs and benefits that PEF's plan will have on its cable operator members. However, the costs that may be recovered from cable operators are tightly prescribed by the FCC. Under the federal scheme, FCTA members pay both makeready costs – i.e., the cost of making the pole ready for its attachments (including the cost of rearranging existing facilities on the pole, guying the pole to increase strength, or replacing the pole where necessary) and annual rent pursuant to the FCC's rate formula, which assures that pole owners receive the fully allocated costs of accommodating the attachment. The annual pole attachment rent is determined by multiplying the percentage of the total usable space occupied by the pole attachment by the sum of the operating expenses and actual capital costs of the utility attributable to the entire pole. In addition, depending upon the</p>

	<p>circumstances, cable operators may incur the cost of transferring their facilities to a new pole.</p> <p>If a prudent, practical and cost-effective plan that includes improved coordination among pole owners and attachers is adopted, FCTA members will realize some benefit in the form of reduced storm restoration costs and outages. FCTA strongly believes that limited pilot projects are necessary to better inform the cost benefit analysis.</p> <p>Thus, while it is not possible at this time to predict with certainty what the cost impact of PEF's Plan to cable operators will be, it is clear cable operators likely will incur increased costs from storm hardening in the form of increased pole attachment rent, increased make-ready costs and increased transfer costs.</p>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	<p>FCTA does not yet have enough information about the costs and benefits of TECO's storm hardening plan to provide a specific estimate of the costs and benefits that TECO's plan will have on its cable operator members. However, the costs that may be recovered from cable operators are tightly prescribed by the FCC. Under the federal scheme, FCTA members pay both makeready costs – i.e., the cost of making the pole ready for its attachments (including the cost of rearranging existing facilities on the pole, guying the pole to increase strength, or replacing the pole where necessary) and annual rent pursuant to the FCC's rate formula, which assures that pole owners receive the fully allocated costs of accommodating the attachment. The annual pole attachment rent is determined by multiplying the percentage of the total usable space occupied by the pole attachment by the sum of the operating expenses and actual capital costs of the utility attributable to the entire pole. In addition, depending upon the circumstances, cable operators may incur the cost of transferring their facilities to a new pole.</p> <p>If a prudent, practical and cost-effective plan that includes improved coordination among pole owners and attachers is adopted, FCTA members will realize some benefit in the form of reduced storm restoration costs and outages. FCTA strongly believes that limited pilot projects are necessary to better inform the cost benefit analysis</p> <p>Thus, while it is not possible at this time to predict with certainty what the cost impact of TECO's Plan on cable operators will be, it is clear cable operators likely will incur increased costs from storm hardening in the form of increased pole attachment rent, increased make-ready costs and increased transfer costs.</p>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
GULF	

Staff	
AT&T	
Embarq	
Verizon	
FCTA	<p>FCTA does not yet have enough information about the costs and benefits of Gulf's storm hardening plan to provide a specific estimate of the costs and benefits that Gulf's plan will have on its cable operator members. However, the costs that may be recovered from cable operators are tightly prescribed by the FCC. Under the federal scheme, FCTA members pay both makeready costs – i.e., the cost of making the pole ready for its attachments (including the cost of rearranging existing facilities on the pole, guying the pole to increase strength, or replacing the pole where necessary) and annual rent pursuant to the FCC's rate formula, which assures that pole owners receive the fully allocated costs of accommodating the attachment. The annual pole attachment rent is determined by multiplying the percentage of the total usable space occupied by the pole attachment by the sum of the operating expenses and actual capital costs of the utility attributable to the entire pole. In addition, depending upon the circumstances, cable operators may incur the cost of transferring their facilities to a new pole.</p> <p>If a prudent, practical and cost-effective plan that includes improved coordination among pole owners and attachers is adopted, FCTA members will realize some benefit in the form of reduced storm restoration costs and outages. FCTA strongly believes that limited pilot projects are necessary to better inform the cost benefit analysis.</p> <p>Thus, while it is not possible at this time to predict with certainty what the cost impact of Gulf's Plan on cable operators will be, it is clear that cable operators likely will incur increased costs from storm hardening in the form of increased pole attachment rent, increased make-ready costs and increased transfer costs.</p>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	



2.5.A Estimate of the effect on reducing storm restoration costs and customer outages - Electric utility

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	It is not possible at this time to estimate the effect on storm restoration costs and customer outages. FCTA believes that it would be prudent, practical and cost effective for FPL to conduct limited pilot projects to enable the parties to this proceeding and the PSC to obtain the information necessary to determine the Plan's effect on reducing storm restoration costs and customer outages.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	It is not possible at this time to estimate the effect on storm restoration costs and customer outages. FCTA believes that it would be prudent, practical and cost effective for PEF to conduct limited pilot projects to enable the parties to this proceeding and the PSC to obtain the information necessary to determine the Plan's effect on reducing storm restoration costs and customer outages.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	It is not possible at this time to estimate the effect on storm restoration costs and customer outages. FCTA believes that it would be prudent, practical and cost effective for TECO to conduct limited pilot projects to enable the parties to this proceeding and the PSC to obtain the information necessary to determine the Plan's effect on reducing storm restoration costs and customer outages.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	

Verizon	
FCTA	It is not possible at this time to estimate the effect on storm restoration costs and customer outages. FCTA believes that it would be prudent, practical and cost effective for Gulf to conduct limited pilot projects to enable the parties to this proceeding and the PSC to obtain the information necessary to determine the Plan's effect on reducing storm restoration costs and customer outages.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

2.5.B Estimate of the effect on reducing storm restoration costs and customer outages - Third-party attachers

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	It is not possible at this time to estimate the effect on storm restoration costs and customer outages. <i>See FCTA FPL Comments at 7-10.</i> FCTA believes that it would be prudent, practical and cost effective for FPL to conduct limited pilot projects to enable the parties to this proceeding and the PSC to obtain the information necessary to determine the Plan's effect on reducing storm restoration costs and customer outages. In addition, FPL should provide additional information about its plans to coordinate with third party attachers in storm restoration efforts.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	It is not possible at this time to estimate the effect on storm restoration costs and customer outages. <i>See FCTA PEF Comments at 6-11.</i> FCTA believes that it would be prudent, practical and cost effective for PEF to conduct limited pilot projects to enable the parties to this proceeding and the PSC to obtain the information necessary to determine the Plan's effect on reducing storm restoration costs and customer outages. . In addition, PEF should provide additional information about its plans to coordinate with third party attachers in storm restoration efforts.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	It is not possible at this time to estimate the effect on storm restoration costs and customer outages. <i>See FCTA TECO Comments at 6-10.</i> FCTA believes that it would be prudent, practical and cost effective for TECO to conduct limited pilot projects to enable the parties to this proceeding and the PSC to obtain the information necessary to determine the Plan's effect on reducing storm restoration costs and customer outages. . In addition, TECO should provide additional information about its plans to coordinate with third party attachers in storm restoration efforts.
MUUC	
Time Warner	

Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	It is not possible at this time to estimate the effect on storm restoration costs and customer outages. <i>See FCTA Gulf Comments at 5-9.</i> FCTA believes that it would be prudent, practical and cost effective for Gulf to conduct limited pilot projects to enable the parties to this proceeding and the PSC to obtain the information necessary to determine the Plan's effect on reducing storm restoration costs and customer outages. . In addition, Gulf should provide additional information about its plans to coordinate with third party attachers in storm restoration efforts.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

2.6 Attachment standards and procedures which address safety, reliability, pole loading capacity, and engineering standards

	<b>Preliminary Position</b>
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FPL's Attachment Standards and Procedures dated May 4, 2007 address safety, reliability, pole loading capacity and engineering standards and comply with the NESC. However, several provisions in FPL's Attachment Standards and Procedures implicate FCC jurisdiction and thus should not be approved by the PSC. Other attachment standards are not prudent, practical or cost-effective or reasonably practicable as required by Rule 25-6.0342. <i>See</i> FCTA FPL Comments at 17-23.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	PEF's Joint Use Pole Attachment Guidelines dated 10/29/2004 address safety, reliability, pole loading capacity and engineering standards and comply with the NESC. However, several provisions in PEF's Joint Use Pole Attachment Guidelines implicate FCC jurisdiction and thus should not be approved by the PSC. Other attachment standards are not prudent, practical or cost-effective or reasonably practicable as required by Rule 25-6.0342. Moreover, FCTA would like to better understand PEF's proposed wind loading assessment for new attachments and overlashing as set forth on page two of its Joint Use Pole Attachment Guidelines. <i>See</i> FCTA PEF Comments at 17-24.
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
TECO	
Staff	
AT&T	
Embarq	
Verizon	

FCTA	TECO's Attachment Standards and Procedures, which are set forth in Section 8 of its Plan, address safety, reliability, pole loading capacity and engineering standards and comply with the NESC. However, numerous provisions in TECO's Attachment Standards and Procedures implicate FCC jurisdiction and thus should not be approved by the PSC. Other attachment standards are not prudent, practical or cost-effective or reasonably practicable as required by Rule 25-6.0342. More information should be provided concerning TECO's requirement that there be a complete engineering study performed for each new attachment, including overlashing, and as well as the loading analysis that TECO current performs for its own attachments. Depending upon the information provided, this requirement may implicate FCC jurisdiction and/or not be prudent, practical or cost effective as required by Rule 25-6.0342. FCTA also would like to better understand the criteria TECO will use when performing a loading analysis on existing poles and determining which entity is responsible if a pole is overloaded. <i>See FCTA TECO Comments at 15-23.</i>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	<b>Preliminary Position</b>
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	FCTA agrees that Gulf's Attachment Standards and Procedures address safety, reliability, pole loading capacity and engineering standards, and meet NESC requirements. However, several provisions in Gulf's Attachment Standards and Procedures implicate FCC jurisdiction and thus should not be approved by the PSC. Other attachment standards, including certain requirements set forth in Plates C-1 through C-11, are not prudent, practical or cost-effective or reasonably practicable as required by Rule 25-6.0342. <i>See FCTA Gulf Comments at 15-21.</i>
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	