

Ruth Nettles

From: Rhonda Dulgar [rdulgar@yvlaw.net]
Sent: Thursday, July 12, 2007 3:41 PM
To: Filings@psc.state.fl.us
Subject: Electronic Filing - Docket Nos. 070297, 070298, 070299, and 070301
Attachments: Storm Hardening Plans-Issue Outline-MUUC & PCB Comments.7-12-07.doc

ORIGINAL

a. Person responsible for this electronic filing:

Robert Scheffel Wright
Young van Assenderp, P.A.
225 South Adams Street, Suite 200
Tallahassee, FL 32301
(850) 222-7206
swright@yvlaw.net

b. Docket Nos. 070297-EI, 070298-EI, 070299-EI, and 070301-EI

In Re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, Florida Administrative Code, submitted by Tampa Electric Company (070297-EI); Progress Energy Florida, Inc. (070298-EI); Gulf Power Company (070299-EI); and Florida Power & Light Company (070301-EI).

c. Document being filed on behalf of the MUUC, the Town of Palm Beach, the Town of Jupiter Island, the City of Panama City Beach (PCB), Florida and the Panama City Beach Community Redevelopment Agency (PCBCRA).

d. There are a total of 19 pages.

e. The documents attached for electronic filing are a cover letter and the MUUC, PCB and PCBCRA's Issues of Areas of Concern (requested by PSC Staff at the June 27, 2007 Workshop).

(see attached file: Storm Hardening Plans-Issue Outline-MUUC & PCB Comments.7-12-07.doc)

Thank you for your attention and assistance in this matter.

Rhonda Dulgar
Secretary to Schef Wright
Phone: 850-222-7206
FAX: 850-561-6834

DOCUMENT NUMBER-DATE

05870 JUL 12 5

FPSC-COMMISSION CLERK

YOUNG VAN ASSENDERP, P.A.

ATTORNEYS AT LAW

Attorneys:

Tasha O. Buford
David S. Dee
Ronald A. Labasky
John T. LaVia, III
Philip S. Parsons
Timothy R. Qualls
Kenza van Assenderp
Robert Scheffel Wright
Roy C. Young

Gallie's Hall
225 South Adams Street
Suite 200
Post Office Box 1833
(ZIP 32302-1833)
Tallahassee, Florida 32301

Telephone (850) 222-7206
Telecopier (850) 561-6834

Of Counsel Attorneys:

Daniel H. Cox
David B. Erwin
Joseph W. Landers, Jr.

—
George Ann C. Bracko
Executive Director

July 12, 2007

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

Re: Docket Nos. 070297, 070298, 070299, and 070301-EI
Issues and Areas of Concern for the MUUC, the Town of Palm
Beach, the Town of Jupiter Island, the City of Panama City
Beach, Florida, and the Panama City Beach Community
Redevelopment Agency

Dear Ms. Cole:

Enclosed for filing on behalf of the above-referenced parties,
are preliminary positions on the Issues and Areas of Concern
identified by staff, as requested by Staff at the June 27, 2007,
workshop.

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

Sincerely,

S/John T. LaVia, III for

Robert Scheffel Wright

DOCUMENT NUMBER-DATE
05870 JUL 12 5
FPSC-COMMISSION CLERK

2.0 Deployment strategy

2.1 Description of facilities affected

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

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	No position at this time.
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	
MUUC	No position at this time.
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	No position at this time. However, PCB and the PCBCRA note that Gulf's Plan provides for very limited installation of hardened facilities, approximately 11 miles of facilities and 450 poles, over its 3-year span.
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	
MUUC	No position at this time as to definition of critical infrastructure and major thoroughfares.
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	No position at this time as to definition of critical infrastructure and major thoroughfares. However, PCB and the PCBCRA note that Gulf's Plan provides for very limited installation of hardened facilities over its 3-year span.
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	
MUUC	FPL's Plan does not adequately measure costs and benefits of hardening, whether by different standards of OH construction or by use of UG technologies as a hardening technique. The MUUC agrees that FPL has appropriately identified the storm restoration cost savings from undergrounding large areas associated with hurricanes an tropical storms, but the MUUC is still waiting for FPL to furnish additional cost savings estimates for UG vs. OH distribution facilities.
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	Gulf has apparently not performed any meaningful analysis or estimates of the

	benefits and costs associated with hardening to various degrees (e.g., Grade B or EWL instead of Grade C construction), or of using undergrounding as a hardening technique, or of any other hardening technique or strategy. The PCB and PCBCRA believe that Gulf's Plan is inadequate in this regard.
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

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

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	The MUUC supports the use of EWL criteria for OH construction, but the MUUC has no specific position at this time regarding the treatment of costs and benefits to third-party attachers in FPL's Plan. However, the MUUC believes that the effect of using UG construction as a hardening technique would provide significant reliability and cost reduction benefits to telecommunications, cable television, and similar providers (who would otherwise be third-party attachers on an OH system).
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	The PCB and the PCBCRA have no position at this time regarding the treatment of costs and benefits to third-party attachers in Gulf's Plan. However, PCB and the PCBCRA believe that the effect of using UG construction as a hardening technique would provide significant reliability and cost reduction benefits to telecommunications, cable television, and similar providers (who would otherwise be third-party attachers on an OH system).
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	
MUUC	The MUUC agrees that FPL has appropriately identified the storm restoration cost savings from undergrounding large areas associated with hurricanes and tropical storms. It is not readily apparent whether FPL has estimated the impacts on customer outages from its hardening Plan. The MUUC generally believes that FPL's Plan should be expected to produce incremental improvements in customer outages in milder storm events, e.g., Category 1 and possibly Category 2 storms, but that it will probably not produce significant benefits in the event of stronger storms. The MUUC believes that UG construction will generally provide significantly greater cost reduction benefits and significantly greater reductions in customer outages than hardening OH facilities per FPL's Plan in any storms, and especially in stronger storms. Additionally, it appears that FPL's calculation and application of cost per customer interrupted does not take account of the fact that there are usually fewer customers interrupted in UG-served areas than in OH-served areas when exposed to similar storm conditions. Identification and calculation of such costs that distinguish between OH and UG systems will enable FPL to develop a better understanding of these restoration costs as a function of proposed net plant in service for new installations and conversion projects, which information would be most useful in planning a more storm-resilient distribution system.
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	

Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	Gulf's Plan does not even attempt to measure costs and benefits of hardening, whether by different standards of OH construction or by use of UG technologies in lieu of OH construction as a hardening technique. PCB and the PCBCRA believe that Gulf's Plan is deficient in this regard. PCB and the PCBCRA believe that UG construction will generally provide significantly greater cost reduction benefits and significantly greater reductions in customer outages than hardening OH facilities in any storms, and especially in stronger storms.
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	
MUUC	The MUUC supports the adoption of EWL or higher wind speed criteria for OH construction. Other than as discussed above with respect to the effect on reduced storm restoration costs for FPL generally, the MUUC has no specific position at this time regarding the effects of hardening OH facilities (e.g., constructing OH facilities to EWL standards as opposed to Grade C or Grade B

	standards) on reduced storm restoration costs and customer outages from the perspective of third-party attachers. The MUUC believes that the effect of using UG construction as a hardening technique would provide significant reliability and cost reduction benefits to telecommunications, cable television, and similar providers (who would otherwise be third-party attachers on an OH system).
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	PCB and the PCBCRA have no specific positions at this time regarding the effects of hardening OH facilities (e.g., constructing OH facilities to EWL standards as opposed to Grade C or Grade B standards) on reduced storm restoration costs and customer outages from the perspective of third-party attachers. However, PCB and the PCBCRA believe that the effect of using UG construction as a hardening technique would provide significant reliability and cost reduction benefits to telecommunications, cable television, and similar providers (who would otherwise be third-party attachers on an OH system).
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

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

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

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

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic Mail this 12th day of July, 2007, to the following:

Adam Teitzman
Keino Young
Lorena Holley
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

Jeffrey Stone
Russell Badders
Steven Griffin
Beggs & Lane Law Firm
P.O. Box 12950
Pensacola, Florida 32591

Susan D. Ritenour
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0780

Bill Walker
215 South Monroe Street
Suite 810
Tallahassee, Florida 32301

John T. Butler
Florida Power & Light
700 Universe Boulevard
Juno Beach, Florida 33408-0420

Paula K. Brown
Regulatory Affairs
TECO
P.O. Box 111
Tampa, Florida 33601-0111

Susan Masterton
Mailstop: FLTLHO0102
1313 Blair Stone Road
Tallahassee, Florida 32301

David Christian
106 East College Avenue
Suite 710
Tallahassee, Florida 32301

Paul Lewis
Progress Energy Florida, Inc.
106 East College Avenue
Suite 800
Tallahassee, Florida 32301

Lee L. Willis
James D. Beasley
Ausley Law Firm
P.O. Box 391
Tallahassee, Florida 32302

John T. Burnett
Progress Energy Florida, Inc.
P.O. Box 14402
St. Petersburg, Florida 33733-4042

Jim Meza
Jennifer Kay
Tracy Hatch
c/o Nancy Sims
AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301

Howard E. Adams
Pennington Law Firm
P.O. Box 10095
Tallahassee, Florida 32302-2095

Dulaney L. O'Roark, III
Six Concourse Parkway
Suite 800
Atlanta, Georgia 30328

S/John T. LaVia, III
Attorney

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

1. Plan Content

1.1 Compliance with National Electric Safety Code

	Preliminary Position
FPL	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	FPL's Plan appears to comply with the NESC.
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	Gulf's plan appears to comply with the minimum requirements of the NESC.
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	
MUUC	FPL's Plan appears to give appropriate consideration to the NESC's Extreme Wind Loading ("EWL") standards or criteria for new distribution facilities, and, based on verbal representations by FPL personnel, the MUUC understands that FPL is in fact implementing the EWL standards/criteria, based on FPL's defined iso-wind-speed contours, as indicated in FPL's Plan.
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	Gulf apparently developed its Plan without any meaningful consideration of the EWL standards/criteria, and without any evaluation of the benefits and costs of hardening its OH distribution facilities to comply with the EWL criteria. In fact, for the most part, Gulf's Plan is only to continue building to the minimum NESC

	requirements. The PCB and PCBCRA believe that Gulf's Plan is inadequate in this regard.
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	
MUUC	FPL's Plan appears to give appropriate consideration to the NESC's Extreme Wind Loading ("EWL") standards or criteria for expansions, reconstruction projects, and relocations, and, based on verbal representations by FPL personnel, the MUUC understands that FPL is in fact implementing the EWL standards/criteria, based on FPL's defined iso-wind-speed contours, as indicated in FPL's Plan.
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	

AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	Gulf's Plan does not include hardening beyond minimum NESC standards for any facilities other than a relatively small amount of facilities defined by Gulf as critical infrastructure facilities. Thus, Gulf's Plan does not effectively address hardening for major planned expansions, reconstruction projects, or relocation of distribution facilities. PCB and the PCBCRA believe that Gulf's Plan is not based on any meaningful consideration of the NESC's EWL standards/criteria, that Gulf's Plan was developed without any evaluation of the benefits and costs of hardening its OH distribution facilities to comply with the EWL criteria, and that Gulf's Plan was developed without any meaningful consideration of UG construction as a hardening technique or technology. In fact, for the most part, Gulf's Plan is only to continue building to the minimum NESC requirements. The PCB and PCBCRA believe that Gulf's Plan is inadequate in this regard.
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	
MUUC	Pending further detailed review, the MUUC has no issues at this time with FPL's plans to implement its EWL standards for facilities serving critical infrastructure and located on major thoroughfares. However, the MUUC includes the following comments regarding "Incremental Hardening" here because FPL's Plan addresses it in the same section (5.1) that addresses EWL for CIF. The MUUC's general comment is that FPL's Plan appears to provide for upgrading non-CIF facilities to levels that may be below EWL standards/criteria indefinitely. For example, in a pole line where the natural breakpoint is 100MPH, FPL's Plan appears to indicate that it would only "incrementally harden" facilities in that line to 100MPH. The MUUC suggests that it may be more appropriate that FPL upgrade poles, as they are replaced, to EWL standards, such that the entire system would eventually converge on being designed to EWL standards (or undergrounded).
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	

Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	Pending further engineering review, PCB and the PCBCRA have no specific position at this time on this issue. However, PCB and the PCBCRA note that Gulf's Plan provides for very limited installation of hardened facilities, approximately 11 miles of facilities and 450 poles, over its 3-year span.
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	
MUUC	As previously commented, the MUUC believes that FPL's Plan should emphasize, promote, and encourage undergrounding as an effective hardening technique or technology, especially since UG facilities will withstand stronger-force storms that OH facilities. Additionally, FPL has approved the use of below-grade, submersible underground feeder switches on Jupiter Island to improve the ability of the underground facilities to withstand flooding. The MUUC believes that FPL's Plan should include a commitment to support and maintain such below-grade and submersible equipment for its system, and to promote such equipment for UG construction in coastal areas on its system, and that FPL should consider the use of this equipment in other low-lying but non-coastal areas.
Time Warner	

Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	PCB and the PCBCRA support Gulf's position favoring the use of rights-of-way for the installation of UG facilities. PCB and the PCBCRA also generally support Gulf's specifications for the installation of UG facilities in locations that naturally provide storm surge protection, and for preferring the installation of switchgear below grade. PCB and the PCBCRA believe that these implementation measures should provide good mitigation of damage to UG and supporting OH facilities due to storm surges and flooding.
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	
MUUC	The MUUC believes that FPL's Plan and implementation measures should favor the location of UG facilities in rights-of-way; FPL has recently communicated to some MUUC members that it will do more to facilitate the use of ROWs, and FPL has furnished a further draft of FPL's ROW Agreement on July 11.
Time Warner	
Town of Jupiter Island	Agree with MUUC.
Town of Palm Beach	Agree with MUUC.
NAWPC	

	Preliminary Position
PEF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
TECO	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
MUUC	
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	

	Preliminary Position
GULF	
Staff	
AT&T	
Embarq	
Verizon	
FCTA	
PCB/PCBCRA	PCB and the PCBCRA support Gulf's position favoring the use of rights-of-way for the installation of UG facilities. PCB and the PCBCRA also generally support Gulf's specifications for the installation of UG facilities in locations that naturally provide storm surge protection, and for preferring the installation of switchgear below grade.
Time Warner	
Town of Jupiter Island	
Town of Palm Beach	
NAWPC	