

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2007 Electric Infrastructure) Storm Hardening Plan filed pursuant to Rule) 25-6.0342, F.A.C., submitted by Tampa) Electric Company) _____)	Docket No. 070297-EI
In re: Review of 2007 Electric Infrastructure) Storm Hardening Plan filed pursuant to Rule) 25-6.0342, F.A.C., submitted by Progress) Energy Florida, Inc.) _____)	Docket No. 070298-EI
In re: Review of 2007 Electric Infrastructure) Storm Hardening Plan filed pursuant to Rule) 25-6.0342, F.A.C., submitted by Gulf Power) Company) _____)	Docket No. 070299-EI
In re: Review of 2007 Electric Infrastructure) Storm Hardening Plan filed pursuant to Rule) 25-6.0342, F.A.C., submitted by Florida) Power & Light Company) _____)	Docket No. 070301-EI

DIRECT TESTIMONY OF SANFORD C. WALKER
ON BEHALF OF VERIZON FLORIDA LLC

SEPTEMBER 7, 2007

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FPSC-COMMISSION CLERK

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Sanford C. Walker. My business address is 1280 Cleveland
3 Street, Clearwater, Florida 33755.

4

5 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

6 A. I am employed by Verizon Florida LLC ("Verizon") as a manager of
7 network engineering, with responsibility for Verizon's Florida coastal
8 area, which includes Manatee, Pasco, Pinellas and Sarasota counties.

9

10 Q. PLEASE DESCRIBE YOUR EMPLOYMENT BACKGROUND.

11 A. I have been employed by Verizon (and its predecessor, GTE) since
12 1994. I was initially hired as an outside plant engineer and have held
13 several positions with increasing responsibility since then, including
14 outside plant supervisor, customer operations specialist, senior staff
15 engineering consultant, section manager, staff consultant and my
16 current position as manager of network engineering.

17

18 Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND.

19 A. I received a Bachelor of Science degree in electrical engineering from
20 the University of Florida in Gainesville in 1994.

21

22 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

23 A. The purpose of my testimony is to address the storm hardening plans
24 that have been filed by Progress Energy Florida, Inc. ("Progress"),
25 Tampa Electric Company ("TECO") and Florida Power & Light Company

1 ("FPL"). I will refer to these companies collectively as the "IOUs."

2

3 **Q. DOES VERIZON SUPPORT THE PROCESS ("PROCESS")**
4 **DESCRIBED IN EXHIBIT KS-1 TO THE TESTIMONY OF KIRK SMITH**
5 **FILED ON BEHALF OF AT&T FLORIDA?**

6 A. Yes. As described in Exhibit KS-1, the Process, among other things,
7 would require the IOUs to provide detailed information before the
8 engineering begins on a project identified in their storm-hardening plans;
9 provide engineering plans promptly upon completion; and meet with
10 Process participants before construction starts. Consistent with the
11 Commission's storm-hardening rules, the Process would permit
12 participants like Verizon to dispute the implementation of a particular
13 project based on the detailed information provided by the IOU.

14

15 **Q. WOULD THE ADOPTION OF THE PROCESS RESOLVE ALL THE**
16 **ISSUES IN THESE DOCKETS?**

17 A. No. Adoption of the Process will eliminate some issues, but, as I
18 discuss below, other issues remain that should be addressed by the
19 Commission.

20

21 **Q. DOES VERIZON OBJECT TO APPROVAL OF PROGRESS'S STORM**
22 **HARDENING PLAN?**

23 A. No. Verizon generally agrees with Progress's position on extreme wind
24 loading ("EWL") and does not object at this stage to the projects it
25 proposes to implement. Verizon reserves the right, however, to seek

1 dispute resolution concerning Progress's implementation of its plan.

2

3 **Q. DOES VERIZON OBJECT TO APPROVAL OF TECOS STORM**
4 **HARDENING PLAN?**

5 A. Yes. Verizon does not object to the specific projects TECO proposes to
6 implement, subject to Verizon's right to seek dispute resolution later if
7 necessary. Verizon requests that TECO's plan not be approved in its
8 current form, however, because it purports to impose pole attachment
9 terms and conditions on attachers, rather than following the parties'
10 existing joint use agreements.

11

12 **Q. PLEASE DESCRIBE THE TERMS AND CONDITIONS TO WHICH**
13 **YOU ARE REFERRING.**

14 A. TECO states that as part of its pole inspection process it will identify
15 poles that fail a preliminary stress test and then conduct a pole loading
16 analysis to determine if the pole is overloaded and if so which
17 attachment is causing the overload. Under sections 7.5.1 and 8.7 of
18 TECO's plan, if the party causing the overload is an attacher that did not
19 obtain a permit from TECO, it would be required either to remove the
20 attachment or pay for the required corrective action. Otherwise, TECO
21 would determine whether it or another party is responsible, and if
22 another party is to blame, that party would be required to bear the cost
23 of corrective action. In section 8.8 of its plan, TECO describes its pole
24 attachment audit program in which it checks for unauthorized
25 attachments and reserves the right to back bill the attachment owners,

1 assess fees and charge for a complete engineering study and for any
2 corrective action.

3

4 **Q. DOES VERIZON OBJECT TO TECO'S INSPECTION OF POLES AND**
5 **AUDITING OF POLE ATTACHMENTS?**

6 A. No. Verizon does not oppose pole inspections or attachment audits, but
7 when TECO finds that a pole is overloaded or believes an attachment is
8 unauthorized, the parties' responsibilities for addressing those situations
9 should be determined under their joint use agreements, not through
10 additional terms and conditions that TECO seeks to impose through its
11 storm hardening plan. Verizon will address the legal basis for this
12 position in its post-hearing brief.

13

14 **Q. TECO WITNESS HAINES STATES AT PAGE 9 OF HIS TESTIMONY**
15 **THAT TECO'S STORM HARDENING PLAN INCLUDES THE**
16 **REPLACEMENT OF POLES THAT MEET GRADE C**
17 **CONSTRUCTION CRITERIA BUT THAT FAIL GRADE B**
18 **REQUIREMENTS. DOES VERIZON HAVE ANY CONCERNS ABOUT**
19 **THIS ASPECT OF TECO'S PLAN?**

20 A. Yes. Verizon is concerned that TECO may attempt to claim that a
21 Verizon attachment, which was within the loading requirements for a
22 Grade C pole, is responsible for overloading the pole when Grade B
23 criteria are applied retroactively. The Commission should make clear
24 that it is not authorizing that cost-shifting technique.

25

1 Q. DOES VERIZON OBJECT TO APPROVAL OF FPL'S STORM
2 HARDENING PLAN?

3 A. Yes. Verizon disagrees with the extensive use of EWL that FPL
4 proposes in its plan for the reasons explained in the Direct Testimony of
5 Dr. Slavin that is being filed on Verizon's behalf. For the reasons given
6 in Dr. Slavin's testimony, to the extent EWL is applied at all, it should be
7 on a trial basis.

8

9 Q. WOULD CERTAIN OF THE CRITICAL INFRASTRUCTURE
10 IMPROVEMENTS DESCRIBED IN FPL'S PLAN BE APPROPRIATE
11 FOR AN EWL PILOT PROJECT?

12 A. Perhaps. Verizon would not object, for example, to the designation of
13 the three 2007 critical infrastructure projects in Verizon's service territory
14 that FPL has identified for 2007 for inclusion in such a pilot project.
15 Further, Verizon would not object to the inclusion of FPL's Targeted
16 Critical Pole Program in such a project.

17

18 Q. SHOULD THE 2008 AND 2009 CRITICAL INFRASTRUCTURE
19 PROJECTS BE INCLUDED IN AN EWL PILOT PROJECT?

20 A. They should not be included at this time. In the first place, it is not clear
21 whether those projects will be considered part of FPL's plan, since they
22 only recently were identified. Moreover, FPL has provided only
23 extremely high level information about these projects so that it is
24 impossible to assess whether they should be included in a pilot project.
25 The best approach would be for FPL, if it wishes to include these

1 projects in an EWL pilot project, to petition to modify its plan once it can
2 describe what the projects would involve and at least roughly how much
3 they would cost. FPL's request then could be evaluated based on the
4 data FPL provides and responses from other parties.

5

6 **Q. SHOULD INCREMENTAL HARDENING PROJECTS IN VERIZON'S**
7 **SERVICE TERRITORY BE INCLUDED IN A PILOT PROJECT?**

8 A. No. My understanding is that Verizon has not received any information
9 concerning any incremental hardening projects in its service territory.
10 There is therefore no basis for including any such projects in a pilot
11 project.

12

13 **Q. SHOULD FPL'S PROPOSAL TO MODIFY ITS DESIGN GUIDELINES**
14 **AND PROCESSES TO APPLY EWL FOR NEW CONSTRUCTION,**
15 **MAJOR PLANNED WORK, RELOCATION PROJECTS AND DAILY**
16 **WORK ACTIVITIES BE APPROVED?**

17 A. No. For the reasons discussed by Dr. Slavin, the ongoing application of
18 EWL to FPL's distribution poles should not be approved.

19

20 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

21 A. Yes.

22

23

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