

**Dorothy Menasco**

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**Sent:** Friday, November 02, 2007 3:40 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Susan Masterton  
**Subject:** 070297-EI, 070298-EI, 070299-EI & 070301-EI, Embarq's Post-Hearing Statement  
**Attachments:** 070297-070301-EI EQ Post Hearing Statement-11-2-07.doc

**Filed on Behalf of:** Susan S. Masterton

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**Docket Nos.** 070297-EI, 070298-EI, 070299-EI & 070301-EI

**Title of filing:** Embarq Florida, Inc.'s Post Hearing Statement

**Filed on behalf of:** Susan Masterton

**No of pages:** 16 pages

**Description:** Embarq Florida, Inc.'s Post-Hearing Statement

<<070297-070301-EI EQ Post Hearing Statement-11-2-07.doc>>

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November 2, 2007

Ms. Ann Cole  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RE: Docket Nos. 070297, 070298, 070299, and 070301-EI, Embarq's Post-Hearing Statement

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida, Inc. is Embarq's Post-Hearing Statement, of which we ask that you file in the above listed dockets.

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

If you have any questions, please do not hesitate to call me at 850/599-1560.

Sincerely,

s/ Susan S. Masterton  
Susan S. Masterton

**Susan S. Masterton**  
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DOCUMENT NUMBER-DATE

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5000 COMMISSION CLERK

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic and U.S. mail this 2<sup>nd</sup> day of November, 2007, to the following:

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The Honorable Charles Falcone, Mayor  
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s/Susan S. Masterton  
Susan S. Masterton

**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
	)	
	)	
	)	FILED: November 2, 2007

**EMBARQ FLORIDA, INC.'S POST-HEARING STATEMENT**

Embarq Florida, Inc. ("Embarq"), in accordance with Order No. PSC-07-0573-PCO-EI, submits the following Post-hearing Statement:

**INTRODUCTION**

It is Embarq's understanding that the storm hardening plans of Tampa Electric Company and Progress Energy were stipulated in their entirety at the hearing. Embarq either concurred in or took no position on, but did not object to, the stipulation of the issues in these dockets. Embarq also concurred in the stipulation regarding the Process to Engage Third Party Attachers that was approved by the Commission at the hearing.

Several issues regarding the Gulf Power and Florida Power and Light storm hardening plans also were stipulated at the hearing. Embarq either concurred in or took no

position on, but did not object to, the stipulation of these issues. As far as the remaining issues in these two dockets, Embarq has no objection to the plans as they are currently proposed and as they are understood to affect Embarq.

## **POST-HEARING POSITIONS**

### **DOCKET NO. 070297-EI – TAMPA ELECTRIC COMPANY**

- 1. Does the Company's Plan address the extent to which, at a minimum, the Plan complies with the National Electric Safety Code (ANSI C-2) [NESC] that is applicable pursuant to subsection 25-6.0345(2), F.A.C.? [Rule 25-6.0342(3)(a)]**

**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

- 2. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)]**

**Embarq's Position:** \*Embarq took no position on, but did not object to, the stipulation approved by the Commission at the hearing.\*

- 3. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]**

**Embarq's Position:** \*Embarq took no position on, but did not object to, the stipulation approved by the Commission at the hearing.\*

- 4. Does the Company's Plan reasonably address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational considerations? [Rule 256.0342(3)(b)3]**

**Embarq's Position:** \*Embarq took no position on, but did not object to, the stipulation approved by the Commission at the hearing.\*

5. **Does the Company's Plan address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(c)]**

**Embarq's Position:** \*Embarq took no position on, but did not object to, the stipulation approved by the Commission at the hearing.\*

6. **Does the Company's Plan address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance pursuant to Rule 25- 6.0341, F.A.C? [Rule 25-6.0342(3)(d)]**

**Embarq's Position:** \*Embarq took no position on, but did not object to, the stipulation approved by the Commission at the hearing.\*

7. **Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]**

**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

8. **Does the Company's Plan provide a detailed description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3. are to be made? [Rule 25-6.0342(4)(b)]**

**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

9. **Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]**

**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

10. **Does the Company's Plan provide a reasonable estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]**

**Embarq's Position:** \*Embarq took no position on, but did not object to, the stipulation approved by the Commission at the hearing.\*

11. **Does the Company's Plan provide an estimate of the costs and benefits, obtained pursuant to subsection (6) below, to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages realized by the third-party attachers? [Rule 25-6.0342(4)(e)]**

**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

12. **Does the Company's Plan include written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSI C-2) that is applicable pursuant to Rule 25-6.034, F.A.C.? [Rule 25-6.0342(5)]**

**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

13. **Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties? [ Rule 25-6.0342(1) and (2)]**

**Embarq's Position:** \*Embarq took no position on, but did not object to, the stipulation approved by the Commission at the hearing.\*

**DOCKET NO. 070298-EI – PROGRESS ENERGY FLORIDA, INC.**



14. Does the Company's Plan address the extent to which, at a minimum, the Plan complies with the National Electric Safety Code (ANSI C-2) [NESC] that is applicable pursuant to subsection 25-6.0345(2), F.A.C.? [Rule 25-6.0342(3)(a)]

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

15. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)1]

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

16. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

17. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational considerations? [Rule 25-6.0342(3)(b)3]

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

18. Does the Company's Plan address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(c)]

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

19. **Does the Company's Plan address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance pursuant to Rule 25- 6.0341, F.A.C? [Rule 25-6.0342(3)(d)]**

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

20. **Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]**

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

21. **Does the Company's Plan provide a detailed description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3. are to be made? [Rule 25-6.0342(4)(b)]**

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

22. **Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]**

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

23. **Does the Company's Plan provide a estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]**

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

24. Does the Company's Plan provide a estimate of the costs and benefits, obtained pursuant to subsection (6) below, to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages realized by the third-party attachers? [Rule 25-6.0342(4)(e)]

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

25. Does the Company's Plan include written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSI C-2) that is applicable pursuant to Rule 25-6.034, F.A.C.? [Rule 25-6.0342(5)]

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

26. Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties? [ Rule 25-6.0342(1) and (2)]

**Embarq's Position:** \*Embarq had no objection to the stipulation approved by the Commission at the hearing.\*

**DOCKET NO. 070299-EI – GULF POWER COMPANY**

27. Does the Company's Plan address the extent to which, at a minimum, the Plan complies with the National Electric Safety Code (ANSI C-2) [NESC] that is applicable pursuant to subsection 25-6.0345(2), F.A.C.? [Rule 25-6.0342(3)(a)]

**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

**28. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)1]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

**29. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

**30. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational considerations? [Rule 256.0342(3)(b)3]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

**31. Does the Company's Plan address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(c)]**

**Embarq's Position:** \*Embarq took no position on, but did not object to, the stipulation approved by the Commission at the hearing.\*

**32. Does the Company's Plan address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance pursuant to Rule 25- 6.0341, F.A.C? [Rule 25-6.0342(3)(d)]**

**Embarq's Position:** \*Embarq took no position on, but did not object to, the stipulation approved by the Commission at the hearing.\*

- 33. Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]**

**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

- 34. Does the Company's Plan provide a detailed description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3. are to be made? [Rule 25-6.0342(4)(b)]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq..\*

- 35. Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

- 36. Does the Company's Plan provide an estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]**

**Embarq's Position:** \*No position.\*

- 37. Does the Company's Plan provide an estimate of the costs and benefits, obtained pursuant to subsection (6) below, to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages realized by the third-party attachers? [Rule 25-6.0342(4)(e)]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

38. **Does the Company's Plan include written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSI C-2) that is applicable pursuant to Rule 25-6.034, F.A.C.? [Rule 25-6.0342(5)]**

**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

39. **Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties? [ Rule 25-6.0342(1) and (2)]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

**DOCKET NO. 070301-EI – FLORIDA POWER & LIGHT COMPANY**

40. **Does the Company's Plan address the extent to which, at a minimum, the Plan complies with the National Electric Safety Code (ANSI C-2) [NESC] that is applicable pursuant to subsection 25-6.0345(2), F.A.C.? [Rule 25-6.0342(3)(a)]**

**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

41. **Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

42. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

43. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational considerations? [Rule 256.0342(3)(b)3]

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

44. Does the Company's Plan address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(c)]

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

45. Does the Company's Plan address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance pursuant to Rule 25- 6.0341, F.A.C? [Rule 25-6.0342(3)(d)]

**Embarq's Position:** \*Embarq took no position on, but did not object to, the stipulation approved by the Commission at the hearing.\*

46. Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

- 47. Does the Company's Plan provide a detailed description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3. are to be made? [Rule 25-6.0342(4)(b)]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

- 48. Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

- 49. Does the Company's Plan provide an estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]**

**Embarq's Position:** \*No position.\*

- 50. Does the Company's Plan provide an estimate of the costs and benefits, obtained pursuant to subsection (6) below, to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages realized by the third-party attachers? [Rule 25-6.0342(4)(e)]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

- 51. Does the Company's Plan include written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSI C-2) that is applicable pursuant to Rule 25-6.034, F.A.C.? [Rule 25-6.0342(5)]**



**Embarq's Position:** \*Embarq concurred in the stipulation approved by the Commission at the hearing.\*

**52. Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties? [Rule 25-6.0342(1) and (2)]**

**Embarq's Position:** \*Embarq has no objection to the Company's Plan as it is currently proposed and as it is understood to affect Embarq.\*

Respectfully submitted this 2nd day of November 2007.

s/Susan S. Masterton  
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ATTORNEY FOR EMBARQ FLORIDA,  
INC.