



July 30, 2008

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VIA HAND DELIVERY

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

Re: *Petition to modify wood pole inspection plan by Progress Energy Florida, Inc.;*
Docket No. 080256-EI

Dear Ms. Cole:

Please find enclosed for filing on behalf of Progress Energy Florida, Inc. the original and five (5) copies of its response to Staff's data request dated July 25, 2008 in the above referenced docket.

Thank you for your assistance in this matter. Please call me at (727) 820-5184 should you have any questions.

Sincerely,

John T. Burnett lms
John T. Burnett

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**Progress Energy Florida, Inc.'s Responses to Staff Data Request
Docket No. 080256-EI**

- Q1. Since the results from the resistograph inspection method were not superior to the traditional sound and bore method, is PEF planning to implement any alternative inspection methods to improve the results of the inspection of concrete encased poles?**

Answer: PEF is using a similar three-step inspection process as described below in Question 3. Osmose will first visually inspect the poles above ground line. Poles failing visual inspection are submitted for replacement. For poles passing visual inspection, the next step is sounding and boring. Osmose performs a ground level inspection method that is referred to as "Shell Boring." The drill bit is placed and aimed so it will inspect the outer shell of the pole below ground. There is a second boring that is performed at 45 degrees that will inspect the pole for shell rot. Osmose will perform additional borings when needed for better assessment of the pole condition. Following the same regimen for concrete encased poles as performed for all poles, a type of remedial wood preservative is used to internally treat the pole.

- Q2. Please state what relevant facts and circumstances PEF would use to determine which method, resistograph or sound and bore, is the most reliable.**

Answer: When determining what inspection methodology provides more accurate inspection results, PEF follows typical quality control and quality assurance protocol and utilizes measures such as repeat testing, cross testing, and random sampling, and PEF analyzes the consistency and accuracy of such results. For example, PEF may test a given pole using the same methodology several times to look for consistency in results, and/or may use different methodologies on the same pole and look for variances and accuracy of results between the two methods. Additionally, PEF may, where appropriate, test methodologies in "control" situations where the condition of a give asset is known and each methodology is tested to see how close it measures to the known control condition.

- Q3. Please state whether PEF would be willing to adopt a process similar to the one utilized by FPL and TECO which is outlined in Order No. PSC-07-0078-PAA-EU:**

For all Southern pine poles that cannot be excavated because they are surrounded by concrete or pavement, FPL uses a three-step process developed by its contractor, Osmose. First, poles are visually inspected above ground

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level to check for woodpecker holes, cracks, etc. Poles that do not pass visual inspection are scheduled for replacement. If poles pass this inspection, they are sounded and bored.

Second, poles are sounded from ground level to as high as the inspector can reach in order to locate interior pockets of decay. For boring, Osmose has developed a ground level inspection method that is referred to as "Shell Boring." The drill bit is placed and aimed so it will inspect the outer shell of the pole below ground. Southern yellow pine poles are bored both into the heart of the pole and into the outer shell below ground. FPL believes the shell boring procedure used by Osmose increases the accuracy of inspection, since shell rot is the predominant decay pattern. Third, poles are internally treated with a type of remedial wood preservative.

Answer: PEF is currently implementing this process for pole inspections of concrete encased poles.