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March 31, 2010

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

RECEIVED-FPSC  
10 APR - 1 AM 11:13  
COMMISSION  
CLERK

Dear Ms. Cole:

RE: UNDOCKETED

Enclosed is an original copy of Gulf Power Company's responses to Commission Staff's First Data Request in reference to the 2009 Annual Reliability Report.

Sincerely,

*Susan D. Ritenour (ew)*

mr

Enclosures

cc w/encl.: Beggs & Lane  
Jeffrey A. Stone, Esq.  
Florida Public Service Commission  
Melissa L'Amoreaux  
Keino Young

DOCUMENT NUMBER-DATE

02367 APR-1 0

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1. According to the 2007 and 2008 Annual Reliability Reports, Gulf completed trimming all 1,878 miles of feeders during 2007 and 2008. In the 2009 report, Gulf states that the company trimmed 827 miles of feeders.
  - a. Were the miles stated in the 2009 report previously cleared in 2007 or 2008?
  - b. If the answer to (a) is no, please explain.
  - c. Did Gulf add any additional feeder miles in 2009?
  - d. Please explain how an increase or decrease in miles for feeders or laterals affects completion of the three-year vegetation management cycle?

ANSWER:

- a. Yes, the miles stated in the 2009 report were cleared in 2007 and 2008.
- b. N/A
- c. Yes, Gulf's total feeder miles increased six miles (from 2008's total of 821 miles to 2009's total of 827 miles).
- d. Gulf anticipates there will be no major affects to the Company's vegetation management programs since changes in miles cleared typically occur gradually with customer growth patterns historically experienced by Gulf. In addition, all new lines receive an initial clearing during construction that ensures vegetation is cleared from the right-of-way and proper clearance between lines and trees is established before the line is placed into service.

DOCUMENT NUMBER-DATE

02367 APR-10

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2. On page 10 of the 2009 report, row C indicated the 827 miles were cleared for feeders and 918 miles cleared for laterals. Row D indicated that there are no remaining miles to clear for feeders and 4,126 miles remaining for laterals. By adding rows C and D, Gulf maintains 827 miles of feeders and 5,044 miles of laterals.
- a. In the 2008 report, Gulf stated it had 966 miles of feeders. Please explain the decrease in the number of miles for feeders from 2008 to 2009.
  - b. In the 2008 report, Gulf stated it had 2,206 miles of laterals. Please explain the increase in lateral miles from 2008 to 2009.

**ANSWER:**

- a. The reference to 966 miles of feeders in the above question appears to have come from Table 3.10 on page 15 of the March 1, 2008 report on the Company's 2007 performance. This table shows data for the Western Region only.

In Gulf's report on 2008 performance, row C of Table 3.3 on page 10 lists 821 miles of feeders cleared and in the report on 2009 performance, row C of Table 3.5 on page 10 lists 827 miles of feeders cleared (an increase of 6 miles of feeders from 2008 to 2009).

- b. The reference to 2,206 miles of laterals in the above question appears to have come from Table 3.10 on page 15 of the March 1, 2008 report on the Company's 2007 performance. This table shows data for the Western Region only.

In Gulf's report on 2008 performance, row C of Table 3.3 on page 10 lists 980 miles of laterals cleared and row D lists 4,054 remaining lateral miles, for a total of 5,034 lateral miles. In Gulf's report on 2009 performance, row C of Table 3.5 on page 10 lists 918 miles of laterals cleared and row D list 4,126 remaining lateral miles, for a total of 5,044 lateral miles. There was a combined increase of 10 lateral miles from 2008 to 2009.

**Note: Decrease of miles from 2007 program to 2008 programs:**

During the development of the Company's 2007 vegetation maintenance plans, Gulf's new GIS mapping system had not been fully developed and was unable to accurately identify the Company's main line feeders miles.

The decision was made to include all 1,878 three phase circuit miles into the 2007 feeder maintenance program to insure all main-line feeders were treated. When mapping system data was fully entered into GIS, Gulf was able to accurately identify all main line feeder miles beginning in 2008. This resulted in a decrease of feeder miles from 1,878 miles in 2007 to 821 miles in 2008 and an increase in lateral miles from 3,981 miles in 2007 to 5,034 miles in 2008. Gulf's 2008 and 2009 programs targeted the system's actual feeder miles instead of all three-phase line miles.

Please refer to Table 3.9 on Page 14 of Gulf's March 1, 2008 report on 2007 performance and Table 3.3 on page 10 of Gulf's March 1, 2009 report on 2008 performance to see the applicable data tables.

3. On page 10 of the 2009 report, Gulf does not state a vegetation goal for 2010.
- a. Does Gulf intend to set a goal for 2010?
  - b. If the answer to (a) is no, why?
  - c. How does Gulf intend to fulfill its vegetation goal for the remaining years?

ANSWER:

- a. Yes
- b. N/A
- c. Gulf's vegetation maintenance goals are being finalized and will be addressed in the Company's 2010-2012 Storm Hardening Plan to be filed with the Commission on May 1, 2010.

4. Please define Grade B and Grade C construction.

ANSWER:

Gulf relies on the definitions provided by the National Electrical Safety Code (NESC). For Transmission and Distribution line construction, the NESC defines Grades of Construction which are required to differentiate between the relative degree of strength and expected performance required of different constructions.

In the NESC, the current Grades of Construction are designated as B, C, and N. Grade C construction has a safety margin built in of 133%. Grade B construction increases this margin to 200%, making Grade B the strongest construction.