

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

COMMISSION
CLERK

APR 30 AM 10:02

RECEIVED-FPSC

DATE: April 30, 2012
TO: Ann Cole, Commission Clerk, Office of Commission Clerk
FROM: Kathryn Gale Winter Cowdery, Senior Attorney, Office of the General Counsel
RE: Docket Number 110313-PU

Please place the attached document in the above referenced docket file. The document was hand delivered to Kathryn Cowdery on April 27, 2012, and needs to be entered into the docket file.

KC

DOCUMENT NUMBER DATE

02696 APR 30 12

FPSC-COMMISSION CLERK

AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

April 27, 2012

HAND DELIVERED

Ms. Kathryn G. W. Cowdery
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Initiation of Rulemaking to Adopt Rule 25-6.0346, and to Amend Rules 25-6.019, 25-6.0345, 25-7.059, 25-7.060, 25-7.061, 25-7.062, 25-7.064, 25-7.065, 25-7.066, 25-7.070, 25-7.071, 25-7.084, 25-12.008, 25-12.027, 25-12.052 and 25-12.072, F.A.C. Docket No. 110313-PU

Dear Ms. Cowdery:

Pursuant to the notice issued April 11, 2012 in the above docket, we request on behalf of Tampa Electric Company that a rule development workshop be convened for the purpose of addressing concerns and recommended modifications to the draft of Rule 25-6.0346 Quarterly Reports of Work Orders and Safety Compliance that accompanied the referenced notice. The requested workshop will enable Tampa Electric and other interested persons to provide input concerning the proposed rule and hopefully improve the manner in which the rule ultimately operates.

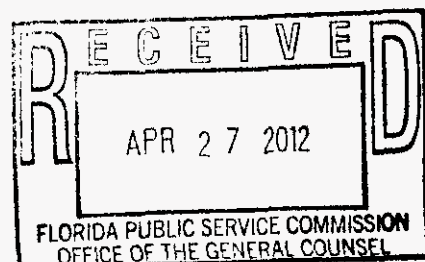
Tampa Electric endorses the Staff's decision to propose that the subject matter addressed in the proposed rule be separated from existing Rule 25-6.-345(2) and (4) to make it easier to locate.

In the requested workshop Tampa Electric will address three additional suggested changes. First, in the body of the proposed rule we suggest that the scope of the rule be clarified in subsection (1) to encompass work orders related to transmission and distribution facility installations. This will conform the scope of the work orders to the focus of the rule. This change can be effected by inserting the phrase "relating to transmission and distribution facility installations" on line 3 of the draft rule after the word "orders."

DOCUMENT NUMBER 02696

APR 30 2012

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Secondly, we suggest that subsection (2) of the draft rule be amended to make the certification called for in that subsection apply to the work performed pursuant to the completed work orders listed in the quarterly report containing the certification. This can be accomplished with the following changes:


(2) In its quarterly report, each utility shall identify ~~all transmissions and distribution facilities subject to the Commission's Safety jurisdiction, and shall certify to the Commission that~~ all work described in the completed work orders listed in the quarterly report they meets or exceeds the applicable standards. Compliance inspections by the Commission shall be made on a random basis or as appropriate.

Tampa Electric's third suggested change relates to the quarterly report form reflected on page 4 of the notice. The two fields on the form entitled "LOCATION (address used for 911 purposes)" and "COUNTY ZIP" call for information that Tampa Electric (and perhaps other utilities) do not necessarily use in describing the locations where transmission and distribution work is performed. For example, Tampa Electric may use references to distribution pole numbers in a certain service area as opposed to a street address or anything that reflects a 911 oriented location. Perhaps the best cure for this concern is to combine the two fields in question under the single designation, "LOCATION." This will enable each utility to include in the report the actual verbiage its employees use to describe the location where transmission and distribution work is being performed.

We offer these changes in advance of the requested workshop to provide the staff a chance to consider them ahead of time and perhaps reduce the duration of the workshop.

Thank you for considering this request.

Sincerely,



James D. Beasley

JDB/pp