



Matthew R. Bernier
Senior Counsel

May 2, 2016

VIA ELECTRONIC FILING

Ms. Carlotta Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: *2016 Wood Pole Inspection Plan; Undocketed*

Dear Ms. Stauffer:

Pursuant to the requirements of Order No. PSC-06-0144-PAA-EI, on behalf of Duke Energy Florida, LLC ("DEF"), please find enclosed for electronic filing, DEF's 2016 Wood Pole Inspection Plan.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Respectfully,

s/Matthew R. Bernier

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MRB/mw
Enclosures



Comprehensive Wood Pole Inspection Plan

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Purpose and Intent of the Plan:

To implement and update a wood pole inspection program that complies with FPSC Order No. PSC-06-0144-PAA-EI issued February 27, 2006 (the “Plan”). The Plan concerns inspection of wooden transmission and distribution poles, as well as pole inspections for strength requirements related to pole attachments. The Plan is based on the requirements of the National Electric Safety Code (“NESC”) and an average eight-year inspection cycle. The Plan provides a detailed program for gathering pole-specific data, pole inspection enforcement, co-located pole inspection, and estimated program funding. This Plan also sets forth pole inspection standards utilized by Duke Energy Florida (“DEF”) that meet or exceed the requirements of the NESC.

The Plan includes the following specific sub-plans:

- Transmission Wood Pole Inspection Plan (“Transmission Plan”).
- Distribution Wood Pole Inspection Plan (“Distribution Plan”).
- Joint Use Wood Pole Inspection Plan (“Joint Use Plan”).

These three inspection sub-plans are outlined and described below. All of these sub-plans will be evaluated on an ongoing basis to address trends, external factors beyond the Company’s control (such as storms and other weather events), and cost effectiveness.

1) Transmission Wood Pole Inspection Plan

A. Introduction

Ground-line inspection and treatment programs detect and treat decay and mechanical damage of in-service wood poles. DEF’s Transmission Department accomplishes this by identifying poles that are 8 years of age or older and treating these poles as necessary in order to extend their useful life. As required, DEF also assesses poles and structures for incremental attachments that may create additional loads. Poles that can no longer maintain the safety margins required by the NESC (ANSI C2-2002) will be remediated. These inspections result in one of four or a combination of the following actions: (1) No action required; (2) Application of treatment; (3) Repaired; (4) Replaced.

B. General Plan Provisions

(i). Pole Inspection Selection Criteria

Transmission performs ground patrols to inspect transmission system line assets to allow for the planning, scheduling, and prioritization of corrective and preventative maintenance work. These patrols assess the overall condition of the assets including insulators, connections, grounding, and signs, as well as an assessment of pole integrity. These patrols are done on a three-year cycle and the assessment data and



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reports generated from these patrols are used to plan the ground-line inspections set forth in Section 1B(ii) below. The ground patrol inspections categorize wood poles into four conditions or states (State 2-5). DEF conducts ground-line inspections of State 2 and 3 poles. State 3 poles are given priority for ground-line inspection scheduling. DEF replaces State 4 and 5 poles. DEF no longer utilizes the State 1 category.

In performing inspection and patrols, the following Transmission Line Wood Poles Inspection State Categories shall apply:

State 2 : Meeting all of the criteria listed below:

- No woodpecker holes or woodpecker holes have been repaired.
- A pole that has been cut and capped.
- Checks/cracks show no decay or insect damage.
- Ground-line inspected/treated with no data in the remarks field of the report and no noted reduction in effective pole diameter.
- Hammer test indicates a hard pole.
- No pole top deflection noted.

State 3 : Meeting one or more of the criteria listed below:

- Checks/cracks show decay or insect damage, or the presence of minimal shell cracking.
- Ground-line inspected/treated with decay noted in the remarks field of the report and a noted reduction in effective pole diameter.
- Hammer test indicates a minimal amount of ground-line decay.
- Pole has been repaired (e.g., C-truss).
- Poles with a wood bayonet or a pole that needs to be cut and capped.
- Pole can be partially hollow but with no less than 3 – 4 inches of shell thickness and cannot be caved during a hammer test.
- Pole top deflection is less than 3 feet.

State 4 : Meeting one or more of the criteria listed below and should be scheduled to be replaced:

- Woodpecker holes which have deep cavities and are not repairable.
- Checks/cracks show significant decay or insect damage, or the presence of substantial shell cracking.
- Decay in the pole top is extensive such that the pole cannot be cut and capped nor is the pole top section a candidate for a bayonet.
- Ground-line inspected/treated and identified as rejected/restorable or rejected/non-restorable.
- When hammer tested, ground-line decay pockets are found and are greater than 5 inches wide and 2 inches deep.
- Pole is hollow with less than 3 – 4 inches of shell thickness extending over more than one-quarter of the pole circumference, determined by hammer test and/or a screw driver.



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- Pole top deflection is between 3 to 5 feet.

State 5 : Meeting one or more of the criteria listed below. (This pole should be scheduled to be replaced as soon as possible):

- Woodpecker holes which have deep cavities and are not repairable, severely affecting the integrity of the pole.
- Ground-line inspection indicates the pole as “priority.”
- When hammer tested, ground-line decay pockets are found and are greater than 8 inches wide by 3 inches deep.
- Pole is hollow with less than 2 inches of shell thickness extending over more than one-third of the pole circumference.
- Pole deflection exceeds 5 feet.

(ii). Ground-Line Inspections

Ground-line inspections of wood transmission poles are conducted by qualified pole inspectors on an average 8-year cycle. This results in, on average, approximately 12.5% of the remaining population of wood poles receiving this type of inspection on an annual basis. Treatment and inspection work shall be done or supervised by a foreman with a minimum of six months experience and who is certified as qualified for this work.

For poles without an existing inspection hole, the pole will be bored at a 45 degree angle below the ground line to a depth that extends past the center of the pole. For previously inspected poles, the original ground-line inspection plug shall be bored out and the depth of the inspection hole measured to ensure that the pole has been bored to the required depth. Treatment application plug(s) will be bored out and the depth of these holes measured to ensure compliance. Hammer marks should be evident to show that the pole has been adequately sounded.

All work done, materials used, and materials disposed of shall be in compliance and accordance with all local, municipal, county, state, and federal laws and regulations applicable to said work. Preservatives used shall conform to the minimum requirements as set forth in this Transmission Plan.

The inspection method used is a sound and bore inspection that will include the following components:

- Above Ground Observations - Visual inspection of the exterior condition of the pole and visual inspection of components hanging from the pole.
- Sound with Hammer – The exterior of the pole is tested with a hammer and the inspector listens for “hollowness” of the pole.



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- Bore at Ground Line – The pole is bored at a 45 degree angle below the ground line. This inspection method helps to determine internal decay at the base as well as measure the amount of “good wood” left on the interior of the pole.
- Excavate to 18 inches (Full Ground Line Inspection) – The soil is removed 18 inches below ground line. Decay pockets are identified and bored to determine the extent of decay.
- Removal of Surface Decay – Identified areas of decay are removed down to “good wood” using a sharp pick.
- Assessment of Remaining Strength – All data collected from the inspection will be used to determine effective circumference and remaining strength of the pole. In evaluating pole conditions, deductions shall be made from the original ground line circumference of a pole to account for hollow heart, internal decay pockets, and removal of external decay. The measured effective critical circumference shall be at the point of greatest decay removal in the vicinity of the ground line taking into account the above applicable deductions. A pole circumference calculator shall be used to determine the measured effective critical circumference. To remain in service “as-is,” the pole shall meet minimum NESC strength requirements. The measured effective critical circumference will be compared to the minimum acceptable circumference for the applicable class pole listed in the latest version of ANSI 05.1-1992, American National Standard for Wood Poles and NESC-C2-1990(1). Poles below the minimum acceptable circumference shall be rejected and will be marked in the field for replacement as either a State 4 or State 5 pole.
- Where excavation at the ground line cannot be achieved due to concrete or similar barriers, pole integrity will be assessed using a drilling resistance measuring device. These devices are now available on the market and are able to accurately detect voids and decay in poles at and below the ground where excavation is not possible.

(iii) Structural Integrity Evaluation

As part of the visual inspection of the poles, the inspector will note and record the type and location of non-native utility pole attachments to the pole or structure. This information will be used by the Joint Use Department to perform a loading analysis on certain poles or structures, where necessary, as more fully described in the Joint Use section of this Plan. In such cases, the loading information obtained from this analysis will be used along with the strength determined in the ground-line inspection. If the loads exceed: a) the strength of the structure when new and b) the strength of the existing structure exceeds the strength required at replacement, according to the NESC, the structure will either be braced to the required strength or will be replaced with a pole of sufficient strength. Specific information on this process is contained in the Joint Use section of this Plan.

(iv). Records and Reporting

A pole inspection report will be filed with the Florida Public Service Commission by March 1st of each year. The report shall contain the following information:

- 1) A description of the methods used for structural analysis and pole inspection.



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- 2) A description of the selection criteria that was used to determine which poles would be inspected.
- 3) A summary report of the inspection data including the following:
 - a. Total number of wood poles in Company inventory.
 - b. Number of pole inspections planned.
 - c. Number of poles inspected.
 - d. Number of poles failing inspection.
 - e. Pole failure rate (%) of poles inspected.
 - f. Number of poles designated for replacement.
 - g. Total number of poles replaced.
 - h. Number of poles requiring minor follow-up.
 - i. Number of poles overloaded.
 - j. Methods of inspection used.
 - k. Number of pole inspections planned for next annual inspection cycle.
 - l. Total number of poles inspected (cumulative) in the 8-year cycle to date.
 - m. Percentage of poles inspected (cumulative) in the 8-year cycle to date.
- 4) A pole inspection report that contains the following detailed information:
 - a. Transmission circuit name.
 - b. Pole identification number.
 - c. Inspection results.
 - d. Remediation recommendation.
 - e. Status of remediation.

C. Program Cost and Funding

- DEF continues to meet the obligations set forth in Order No. PCS-06-0144-PAA-EI. The number of poles inspected per year will start at approximately 3,800 poles, but may vary from year to year depending on previous years' accomplishments.

DEF is currently on track to meet the 8-year cycle requirements. The number of poles inspected may vary year to year depending on the previous year's accomplishments with the intent to complete inspections in the required timeframe. The estimated figures in the chart below are "best estimates," given information and facts known at this time and are subject to change or modification.

Wood Pole Program Cost Estimates



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Annual Unit & Cost Estimate		
Cycle		
Years per cycle	8	
Poles inspected per year	3,800	On average; may vary year to year
Assumed poles replaced*	5%	Current future projections
O&M Cost		
GL Inspection & Treatment	\$250,000	On average; may vary year to year
Capital Cost		
Pole & Insulator Replacements	\$6,000,000	On average; may vary year to year
Hurricane Hardening	\$7,000,000	On average; may vary year to year

* Assumption is made that approximately 5% of the poles inspected will be identified for replacement.

2) Distribution Wood Pole Inspection Plan

A. Introduction

In accordance with FPSC Order No. PSC-06-0144-PAA-EI, DEF’s Distribution Department inspects Company-owned wood poles on an average 8-year cycle. These inspections determine the extent of pole decay and any associated loss of strength. The information gathered from these inspections is used to determine pole replacements and to effectuate the extension of pole life through treatment and reinforcement. Additionally, information collected from the wood pole inspections is used to populate regulatory reporting requirements, provide data for loading analyses, identify other equipment maintenance issues, and used to track the results of the inspection program over time.

B. General Plan Provisions

(i). Ground-line Inspection Purpose

- The ground-line inspection process is the industry standard for determining the existing condition of wood pole assets. This inspection helps to determine extent of decay and the remaining strength of a pole. Ground-line inspections also provide insight into the remaining life of a wood pole.
- The ground-line inspection is performed at the base of the pole because the base is the location of the largest “bending moment,” as well as the area subject to the most fungal decay and insect attack. Assessing the condition of the pole at the base is the most efficient way to effectively treat and restore a wood pole.

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(ii). Pole Inspection Process

When a wood distribution pole, other than a CCA pole, is inspected, the tasks listed below will be performed. For a CCA type wood distribution pole less than 16 years of age, the inspection will consist of a visual above ground inspection and sounding with hammer, both procedures are described below. For CCA poles 16 years of age and greater, all inspection methods described below are used. Boring at Ground Line is also performed on type CCA poles when decay is present.

- Above Ground Observations - Visual inspection of the exterior condition of the pole and visual inspection of components hanging from the pole.
- Partial Excavation – The soil is removed around the base of the pole and the pole is inspected for signs of decay.
- Sound with Hammer – The exterior of the pole is tested with a hammer and the inspector listens for “hollowness” of the pole.
- Bore at Ground Line – The pole is bored at a 45 degree angle below the ground line. This inspection method helps to determine internal decay at the base as well as measure the amount of “good wood” left on the interior of the pole.
- Excavate to 18 Inches (Full Ground Line Inspection) – If significant decay is found during the full excavation, the soil is removed 18 inches below ground line. Decay pockets are identified and bored to determine the extent of decay.
- Removal of Surface Decay – Identified areas of decay are removed down to “good wood” using a sharp pick.
- Prioritization of rejected poles – rejected poles shall be assessed on their overall condition and then prioritized accordingly. Generally these poles will then be replaced in order of priority, from highest to lowest.
- For poles where obstructions, such as concrete encasement, make full excavation impractical DEF will utilize the best economical inspection process in accordance with Order No. PSC-08-0644-PAA-EI issued October 6, 2008.

(iii) Data Collection

All data collected through the inspection process will be submitted to DEF’s Distribution Department in electronic format by inspection personnel. This data will be used to determine effective circumference and remaining strength of the pole. In evaluating pole conditions, deductions shall be made from the original ground line circumference of a pole to account for hollow heart, internal decay pockets, and removal of external decay. The measured effective critical circumference shall be at the point of greatest decay removal in the vicinity of the ground line taking into account the above applicable deductions. A pole circumference calculator shall be used to determine the measured effective critical circumference. To remain in service “as-is,” the pole shall meet minimum NESC strength requirements. The measured effective critical circumference will be compared to the applicable minimum acceptable circumference listed in the most current versions of ANSI 05.1-1992, American National Standard for Wood Poles, and



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NESC-C2-1990(1). Poles below the minimum acceptable circumference shall be rejected and will be marked in the field for replacement.

(iv). Structural Integrity Evaluation

- See Joint Use Pole Inspection Plan, section B, paragraph (i).

(v). Records and Reporting

A pole inspection report will be filed with the Florida Public Service Commission by March 1st of each year. The report shall contain the following information:

- 1) A description of the methods used for structural analysis and pole inspection.
- 2) A description of the selection criteria that was used to determine which poles would be inspected.
- 3) A summary report of the inspection data including the following:
 - a. Total number of wood poles in Company inventory.
 - b. Number of pole inspections planned.
 - c. Number of poles inspected.
 - d. Number of poles failing inspection.
 - e. Pole failure rate (%) of poles inspected.
 - f. Number of poles designated for replacement.
 - g. Total number of poles replaced.
 - h. Number of poles requiring minor follow-up.
 - i. Number of poles overloaded.
 - j. Methods of inspection used.
 - k. Number of pole inspections planned for next annual inspection cycle.
 - l. Total number of poles inspected (cumulative) in the 8-year cycle to date.
 - m. Percentage of poles inspected (cumulative) in the 8-year cycle to date.
- 4) A pole inspection report that contains the following detailed information:
 - a. Distribution circuit name.
 - b. Pole identification number.
 - c. Inspection results.
 - d. Remediation recommendation.
 - e. Status of remediation.



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C. Program Cost and Funding

(i). Poles Program Cost Estimates

DEF continues to successfully meet the obligations set forth in Order No. PSC-06-0144-PAA-EI and continues to inspect poles based on the 8-year cycle as mandated by the FPSC. The number of poles inspected per year is expected to be approximately 96,000 poles, but may vary from year to year depending on previous years' accomplishments with the intent to complete inspections in the required timeframe. Funding requirements to meet all aspects of this program will be adjusted from year to year, as well. DEF is currently on track to meet the 8-year cycle requirements.

The estimated figures in the charts below are "best estimates," given information and facts known at this time and are subject to change or modification.

Annual Unit Estimate				
Years per Cycle	# of Wood Poles to be inspected per year	Replacements	Bracing	Treatments
8	96,000	7,000	368	25,600

Annual Cost Estimate							
Years per Cycle	O&M Costs		Capital		O&M Total	Capital Total	Program Total Cost
	Inspections (S&B + Excavation)	Treatments (add'l to inspection)	Replacements	Braces			
8	\$ 1,800,000	\$ 200,000	\$ 28,000,000	\$ 422,000	\$ 2,000,000	\$ 28,422,000	\$ 30,000,000

3) Joint Use Pole Inspection Plan

A. Introduction

DEF currently has approximately 774,000 joint use attachments on distribution poles and approximately 7,400 joint use attachments on transmission poles. On average, DEF receives approximately 3,000 new attachment requests per year. All new attachment requests are reviewed in the field to assure the new attachments meet NESC and company clearance and structural guidelines. The information provided below outlines DEF's attachment permitting process and how DEF intends to gather structural information on certain existing joint use poles over an average 8-year inspection cycle to meet the obligations set forth in Order No. PCS-06-0144-PAA-EI.

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B. General Plan Provisions

(i). Structural Analysis for a Distribution Pole New Joint Use Attachment

When the Joint Use Department receives a request to attach a new communication line to a distribution pole, the following is done to ensure that NESC clearance and loading requirements are met before permitting the new attachment:

- Each pole is field inspected, and the attachment heights of all electric and communication cables and equipment are collected. The pole number, pole size and class (type) are noted as well as span lengths of cables and wires on all sides of the pole.
- For each group of poles in a tangent line, the pole that has the most visible loading, line angle and longest or uneven span length is selected to be modeled for wind loading analysis.
- The selected pole's information is loaded into a software program called "SPIDA CALC" from IJUS. The pole information is analyzed and modeled under the NESC Light District settings of 9psf, no ice, 30° F, at 60 MPH winds to determine current loading percentages.
- If that one pole fails, the next worst case pole in that group of tangent poles is analyzed as well.
- Each pole is analyzed to determine existing pole loading and the proposed loading with the new attachment.
- If the existing analysis determines the pole is overloaded, a work order is issued to correct the overload. The remedy may include replacing the pole with a larger class pole. If the pole fails only when the new attachment is considered, a work order estimate is made and presented to the communication company wishing to attach.

(ii). Structural Analysis for a Transmission Pole New Joint Use Attachment

When the Joint Use Department receives a request to attach a new communication line to a transmission pole with distribution underbuild, the following will be done to ensure that NESC clearance and loading requirements are met before permitting the new attachment:

- Each pole is field inspected, and the attachment heights of all electric and communication cables and equipment are collected. The pole number, pole size and class (type) are noted as well as span lengths of cables and wires on all sides of the pole.
- All pole information including structural plan and profiles are sent to the engineering company, Stantec, to be modeled in PLS-CADD/LITE and PLS-POLE for structural analysis.
- Stantec engineers determine the worst case structures in a tangent line and request the structural drawings and attachment information on those selected poles. Typically, transmission poles with line angle and uneven span lengths are the poles considered for wind loading analysis.
- The selected pole information is loaded into the PLS-CADD and PLS-POLE software. Depending on the pole location per the NESC wind charts, one of the following load cases is run. NESC Light District: 9psf, no ice, 30° F, 60mph; NESC Extreme: 3 sec gust for the specific county, no ice, 60° F (Ex: Orange County is 110 mph); or DEF Extreme at 36psf, 75° F, wind chart mph

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- If that one pole fails, the next worst case pole in that group of tangent poles is analyzed as well.
- Each pole is analyzed to determine existing pole loading and the proposed loading with the new attachment.
- If the existing analysis determines the pole is overloaded, a work order is issued to correct the overload. The remedy may include replacing the pole with a larger class pole. If the pole fails only when the new attachment is considered, a work order estimate is made and presented to the communication company wishing to attach.

(iii). Analysis of Existing Joint Use Attachments On Distribution Poles

There are approximately 774,000 joint use attachments on approximately 450,000 distribution poles in the DEF system. All distribution poles with joint use attachments will be inspected on an average 8-year audit cycle to determine existing structural analysis for wind loading. These audits will start at the sub-station where the feeder originates. For each group of poles in a tangent line, the pole that has the most visible loading, line angle, and longest or uneven span length will be selected to be modeled for wind loading analysis. Each pole modeled will be field inspected. The attachment heights of all electric and communication cables and equipment will be collected. The pole age, pole type, pole number, pole size / class, span lengths of cables and wires, and the size of all cables and wires on all sides of the pole will be collected.

The selected pole's information will then be loaded into a software program called "SPIDA CALC" from IJUS. The pole information will be analyzed and modeled under the NESC Light District settings of 9psf, no ice, 30° F, at 60 MPH winds to determine current loading percentages. If that one pole fails, the next worst case pole in that group of tangent poles will be analyzed as well. Each pole analyzed will determine the existing pole loading of all electric and communication attachments on that pole. If the existing analysis determines the pole is overloaded, a work order will be issued to correct the overload. The remedy may include replacing the pole with a larger class pole. Should the original pole analyzed meet the NESC loading requirements, all similar poles in that tangent line of poles will be noted as structurally sound and entered into the database as "PASSED" structural analysis. Poles rated at 100% or lower will be designated as "PASSED." Poles that are analyzed and determined to be more than 100% loaded will be designated as "FAILED," and corrected. If the pole is changed out, the GIS database will be updated to reflect the date the new pole was installed.

(iv). Analysis of Existing Joint Use Attachments On Transmission Poles

There are approximately 7,400 joint use attachments on approximately 5,600 transmission poles in the DEF system. All transmission poles with joint use attachments will be inspected on an average 8-year audit cycle to determine existing structural analysis for wind loading. Audits will start at the sub-station where the feeder originates. All pole information (pole size, class, type, age, pole number, cable, wire, equipment attachment heights, span lengths) including structural plan and profiles will be sent to the engineering company, Stantec, to be modeled in PLS-CADD/LITE and PLS-POLE for structural analysis. Stantec engineers will determine the worst case structures in a tangent line and request the structural



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drawings and attachment information on those selected poles. Typically, transmission poles with line angle and uneven span lengths are the poles considered for wind loading analysis.

The selected pole information will be loaded into the PLS-CADD and PLS-POLE software. Depending on the pole location per the NESC wind charts, one of the following load cases is run. **NESC Light District:** 9psf, no ice, 30° F, 60mph; **NESC Extreme:** 3 sec gust for the specific county, no ice, 60° F (Ex: Orange County is 110 mph); or **DEF Extreme** at 36psf, 75° F, wind chart mph. If that one transmission pole fails, the next worst case pole in that group of tangent poles will be analyzed as well. Each transmission pole analyzed will determine the existing pole loading of all electric and communication attachments on that pole. If the existing analysis determines the transmission pole is overloaded, a work order will be issued to correct the overload. The remedy may include replacing the pole with a larger class pole. Should the original pole analyzed meet the NESC loading requirements, all similar poles in that tangent line of poles will be noted as structurally sound and entered into the database as “PASSED” structural analysis.

Transmission poles rated at 100% or lower will be designated as “PASSED.” Transmission poles that are analyzed and determined to be more than 100% loaded will be designated as “FAILED,” and corrected. If the transmission pole is changed out, the GIS database will be updated to reflect the date the new pole was installed.

(v). Records and Reporting

A pole inspection report will be filed with the Florida Public Service Commission by March 1st of each year. The report shall contain the following information:

- 1) A description of the methods used for structural analysis and pole inspection.
- 2) A description of the selection criteria that was used to determine which poles would be inspected.
- 3) A summary report of the inspection data including the following:
 - a. Number of poles inspected.
 - b. Number of poles not requiring remediation.
 - c. Number of poles requiring remedial action.
 - d. Number of pole requiring minor follow up.
 - e. Number of poles requiring a change in inspection cycle.
 - f. Number of poles that were overloaded.
 - g. Number of inspections planned.



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C. Program Cost and Funding

(i). Pole Analysis Funding

As stated above, there are currently approximately 774,000 joint use attachments on approximately 450,000 distribution poles and approximately 7,400 joint use attachments on approximately 5,600 transmission poles. DEF will analyze the “worst case” poles in a tangent line of similar poles as deemed appropriate during field inspections.

In order to meet the obligations set forth in Order No. PCS-06-0144-PAA-EI, DEF requires incremental funding annually to successfully gather data and enter it into the required reporting format. See calculation that follows. The estimated figures in these charts are “best estimates,” given information and facts known at this time and are subject to change or modification.

Annual Unit & Cost Estimate									
Distribution poles with joint use	Annual inspected (8-yr cycle)	10% of Distribution poles analyzed	1% of Distribution poles replaced	Transmission poles with joint use	Annual inspected (8-yr cycle)	30% of Transmission poles analyzed	10% of Transmission poles replaced	Total cost to analyze poles (O&M)	Total cost to replace poles (capital)
450,000	56,000	5,600	56	5,600	700	210	21	\$551,950	\$585,000