

MANUEL BLANCO'S COMPLAINT
DATED APRIL 3, 2018
TO
THE FLORIDA PUBLIC SERVICE COMMISSION
RE
FLORIDA POWER & LIGHT COMPANY
PURSUANT TO
FLORIDA ADMINISTRATIVE CODE
RULE 25-22.036 AND RULE 28-106.104

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PREFACE

1. Florida Power & Light Company, hereinafter "FPL", whose principal address is 700 Universe Boulevard, Juno Beach, Florida 33408, supplies electrical power to six residential buildings in South Winds Condominium, Miami, Florida 33174, through one or two liquid-filled pad-mounted transformer per building. The street address of Building 1 is 9300 West Flagler Street, hereinafter referred to as "Building 9300"; of Building 2 is 9310 West Flagler Street, hereinafter referred to as "Building 9310"; of Building 3 is 9320 West Flagler Street, hereinafter referred to as "Building 9320"; of Building 4 is 9340 West Flagler Street, hereinafter referred to as "Building 9340"; of Building 5 is 9311 S. W. 4 Street, hereinafter referred to as "Building 9311"; of Building 6 is 9301 S. W. 4 Street, hereinafter referred to as "Building 9301".
2. Manuel Blanco co-owns a unit in this condominium community and therefore has a substantial interest in the safety inside this community.
3. Section 366.04 of the Florida Statutes (2017) states in pertinent part:

"the commission [Florida Public Service Commission] shall have jurisdiction to regulate and supervise each public utility with respect to its... service... The commission shall further have exclusive jurisdiction to prescribe and enforce safety standards for transmission and distribution facilities of all public electric utilities... In adopting safety standards, the commission shall, at a minimum: (a) Adopt the 1984 edition of the National Electrical Safety Code (ANSI C2) as initial standards; and (b) Adopt, after review, any new edition of the National Electric Safety Code (ANSI C2). The standards prescribed by the current 1984 edition of the National Electrical Safety Code (ANSI C2) shall constitute acceptable and adequate requirements for the protection of the safety of the public, and compliance with the minimum requirements of that code shall constitute good engineering practice by the utilities. The administrative authority referred to in the 1984 edition of the National Electrical Safety Code is the commission."

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4. The 2012 edition of the National Electric Safety Code, Section 152, hereinafter referred to as "2012NESC", states:

A. Outdoor installations

2. The installation of liquid-filled transformers shall utilize one or more of the following methods to minimize fire hazards. The method to be applied shall be according to the degree of the fire hazard. Recognize methods are the use of less flammable liquids, space separations, fire-resistant barriers, automatic extinguishing systems, absorption beds, and enclosures.

The amount and characteristics of liquid contained should be considered in the selection of space separation, fire-resistant barriers, automatic extinguishing systems, absorption beds, and enclosures that confine the liquid of a rupture transformer tank, all of which are recognized as safeguards.

5. EXHIBIT A is a copy of FPL Edition March 2017 Electric Service Standards, Section V, Page 3 of 6, titled "V. REQUIREMENTS FOR TRANSFORMERS SITUATED ON CUSTOMER PROPERTY", hereinafter referred to as "FPLESS", which states:

"Padmounted Transformers and pad may be located minimum 3' [3 feet] on both sides and back side only."

6. This complaint is dated April 3, 2018.

7. This complaint is comprised of complaints on each transformer.

COMPLAINTS ON TRANSFORMER WEST OF BUILDING 9300

EXHIBIT B is a photo in color taken 4/1/2018 of the liquid-filled transformer installed west of Building 9300 between the walkway and the stairway. The distance between this transformer and the main door of the condo unit is 15.83 feet. The distance between the back of this transformer and the stairway is 1.25 feet. This transformer at ground level was not designed to withstand flooding caused by a hurricane and therefore flooding could cause this transformer to explode or electrify the water near the transformer long enough to electrocute any person touching the water. This transformer requires clearance for cooling its liquid. The installation of this transformer does not meet the minimum clearance on its back required by FPLESS and does not utilize at least one of the methods to minimize fire hazards described in 2012NESC for outdoor installations of liquid-filled transformers.

COMPLAINTS ON TRANSFORMER EAST OF BUILDING 9300

EXHIBIT C is a photo in color taken 4/1/2018 of the liquid-filled transformer installed east of Building 9300 between the walkway and the stairway. The distance between the transformer and the main door of the condo unit is 16.17 feet. The distance between the back of the transformer and the stairway is 1.42 feet. This transformer at ground level was not designed to withstand flooding caused by a hurricane and therefore flooding could cause this transformer to explode or electrify the water near the transformer long enough to electrocute any person touching the water. This transformer requires clearance for cooling its liquid. The installation of this transformer does not meet the minimum clearance on its back required by FPLESS and does not utilize at least one of the methods to minimize fire hazards described in 2012NEC for outdoor installations of liquid-filled transformers.

COMPLAINTS ON TRANSFORMER NORTHEAST OF BUILDING 9310

EXHIBIT D is a photo in color taken 4/1/2018 of the liquid-filled transformer installed northeast of Building 9310 between the walkway and the stairway. The distance between the transformer and the main door of the condo unit is 16.50 feet. The distance between the back of the transformer and the stairway is 1.58 feet. This transformer at ground level was not designed to withstand flooding caused by a hurricane and therefore flooding could cause this transformer to explode or electrify the water near the transformer long enough to electrocute any person touching the water. This transformer requires clearance for cooling its liquid. The installation of this transformer does not meet the minimum clearance on its back required by FPLESS and does not utilize at least one of the methods to minimize fire hazards described in 2012NEC for outdoor installations of liquid-filled transformers.

COMPLAINTS ON TRANSFORMER SOUTHEAST OF BUILDING 9310

EXHIBIT E is a photo in color taken 4/1/2018 of the liquid-filled transformer installed southeast of Building 9310 between the walkway and the stairway. The distance between the transformer and the main door of the condo unit is 15.67 feet. The distance between the back of the transformer and the stairway is 1.42 feet. This transformer at ground level was not designed to withstand flooding caused by a hurricane and therefore flooding could cause this transformer to explode or electrify the water near the transformer long enough to electrocute any person touching the water. This transformer requires clearance for cooling its liquid.

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The installation of this transformer does not meet the minimum clearance on its back required by FPLESS and does not utilize at least one of the methods to minimize fire hazards described in 2012NESC for outdoor installations of liquid-filled transformers.

COMPLAINTS ON TRANSFORMER EAST OF BUILDING 9320

EXHIBIT F is a photo in color taken 4/1/2018 of the liquid-filled transformer installed east of Building 9320 between the walkway and the stairway. The distance between the transformer and the main door of the condo unit is 15.50 feet. The distance between the back of the transformer and the stairway is 1.54 feet. This transformer at ground level was not designed to withstand flooding caused by a hurricane and therefore flooding could cause this transformer to explode or electrify the water near the transformer long enough to electrocute any person touching the water. This transformer requires clearance for cooling its liquid. The installation of this transformer does not meet the minimum clearance on its back required by FPLESS and does not utilize at least one of the methods to minimize fire hazards described in 2012NESC for outdoor installations of liquid-filled transformers.

COMPLAINTS ON TRANSFORMER WEST OF BUILDING 9340

EXHIBIT G is a photo in color taken 4/1/2018 of the liquid-filled transformer installed west of Building 9340 between the walkway and the stairway. The distance between the transformer and the main door of the condo unit is 15.42 feet. The distance between the back of the transformer and the stairway is 1.54 feet. This transformer at ground level was not designed to withstand flooding caused by a hurricane and therefore flooding could cause this transformer to explode or electrify the water near the transformer long enough to electrocute any person touching the water. This transformer requires clearance for cooling its liquid. The installation of this transformer does not meet the minimum clearance on its back required by FPLESS and does not utilize at least one of the methods to minimize fire hazards described in 2012NESC for outdoor installations of liquid-filled transformers.

COMPLAINTS ON TRANSFORMER NORTHEAST OF BUILDING 9311

EXHIBIT H is a photo in color taken 4/1/2018 of the liquid-filled transformer installed northeast of Building 9311 between the walkway and the stairway. The distance between the transformer and the main door of the condo unit is 17.58 feet. The distance between the back of the transformer and the stairway is 1.83

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feet. This transformer at ground level was not designed to withstand flooding caused by a hurricane and therefore flooding could cause this transformer to explode or electrify the water near the transformer long enough to electrocute any person touching the water. This transformer requires clearance for cooling its liquid. The installation of this transformer does not meet the minimum clearance on its back required by FPLESS and does not utilize at least one of the methods to minimize fire hazards described in 2012NESC for outdoor installations of liquid-filled transformers.

COMPLAINTS ON TRANSFORMER SOUTHEAST OF BUILDING 9311

EXHIBIT I is a photo in color taken 4/1/2018 of the liquid-filled transformer installed southeast of Building 9311 between the walkway and the stairway. The distance between the transformer and the main door of the condo unit is 15.21 feet. The distance between the back of the transformer and the stairway is 1.83 feet. This transformer at ground level was not designed to withstand flooding caused by a hurricane and therefore flooding could cause this transformer to explode or electrify the water near the transformer long enough to electrocute any person touching the water. This transformer requires clearance for cooling its liquid. The installation of this transformer does not meet the minimum clearance on its back required by FPLESS and does not utilize at least one of the methods to minimize fire hazards described in 2012NESC for outdoor installations of liquid-filled transformers.

COMPLAINTS ON TRANSFORMER EAST OF BUILDING 9301

EXHIBIT J is a photo in color taken 4/1/2018 of the liquid-filled transformer installed east of Building 9301 between the walkway and the wall of the stairway. The distance between the transformer and the main door of the condo unit is 15.58 feet. The distance between the back of the transformer and the stairway is 1.25 feet. This transformer at ground level was not designed to withstand flooding caused by a hurricane and therefore flooding could cause this transformer to explode or electrify the water near the transformer long enough to electrocute any person touching the water. This transformer requires clearance for cooling its liquid. The installation of this transformer does not meet the minimum clearance on its back required by FPLESS and does not utilize at least one of the methods to minimize fire hazards described in 2012NESC for outdoor installations of liquid-filled transformers.

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COMPLAINTS ON TRANSFORMER WEST OF BUILDING 9301

EXHIBIT K is a photo in color taken 4/1/2018 of the liquid-filled transformer installed west of Building 9301 between the walkway and the stairway. The distance between the transformer and the main door of the condo unit is 15.33 feet. The distance between the back of the transformer and the stairway is 1.33 feet. This transformer at ground level was not designed to withstand flooding caused by a hurricane and therefore flooding could cause this transformer to explode or electrify the water near the transformer long enough to electrocute any person touching the water. This transformer requires clearance for cooling its liquid. The installation of this transformer does not meet the minimum clearance on its back required by FPLESS and does not utilize at least one of the methods to minimize fire hazards described in 2012NEC for outdoor installations of liquid-filled transformers.

RELIEF REQUESTED

Manuel Blanco respectfully requests this relief: (1) that this commission orders FPL to have every transformer in South Winds Condominium meet the minimum three feet clearance on the back of each transformer as required by its Electrical Service Standards; (2) that this commission orders FPL to have every liquid-filled transformer in South Winds Condominium meet the requirements of the 2012 edition of the National Electrical Safety Code for outdoor installations of liquid-filled transformers; (3) that this commission orders FPL to provide clear and convincing evidence to this commission that its transformers in South Winds Condominium can withstand being immersed in water during a hurricane without exploding or electrifying the water near the transformer long enough to electrocute any person touching the water.

CERTIFICATE OF SERVICE

Per this commission's senior attorney Pamela H. Page, it's not necessary for me to serve FPL with a copy of this complaint.

/S/_____
Manuel Blanco
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EXHIBIT A



Electric Service Standards

DATE
02-13-17

PREPARED BY

SUBJECT

SECTION: PAGE

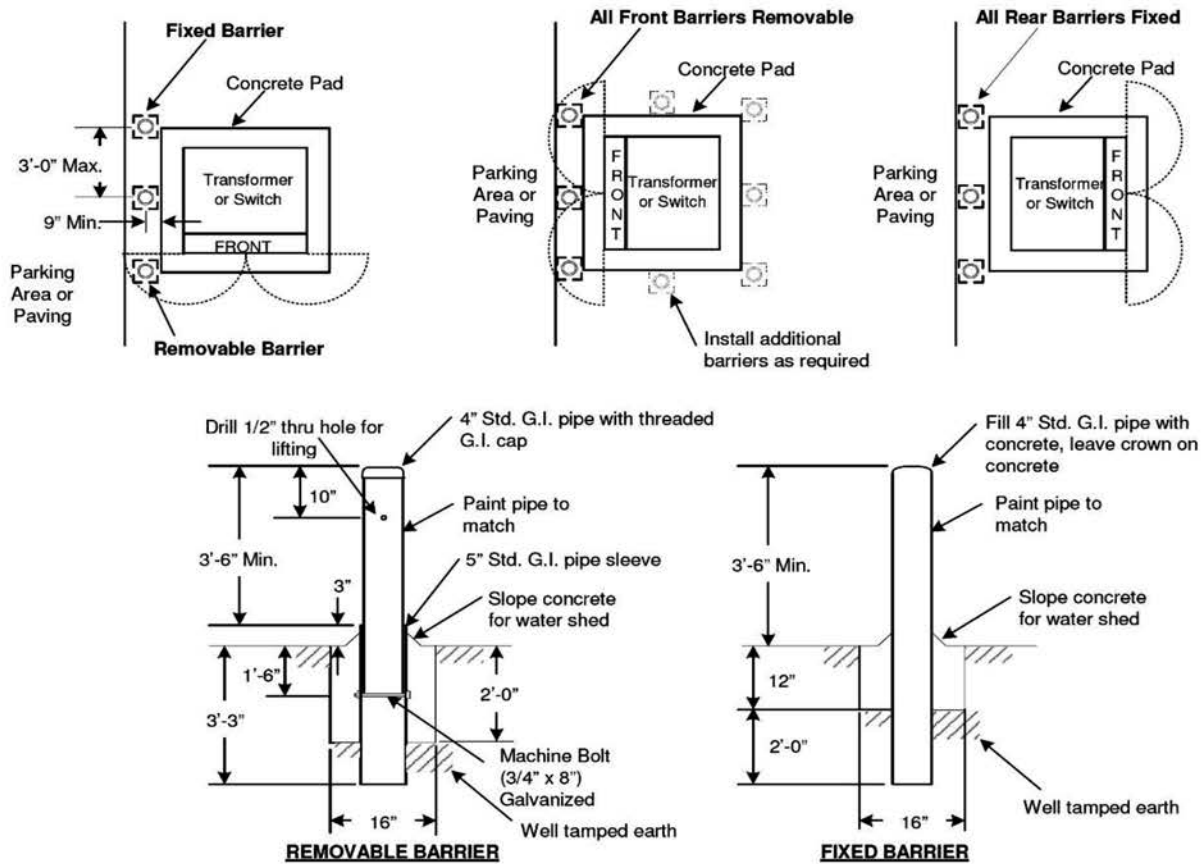
Delivery Assurance –
Design Support

V. REQUIREMENTS FOR TRANSFORMERS
SITUATED ON CUSTOMER PROPERTY

V: 3 of 6

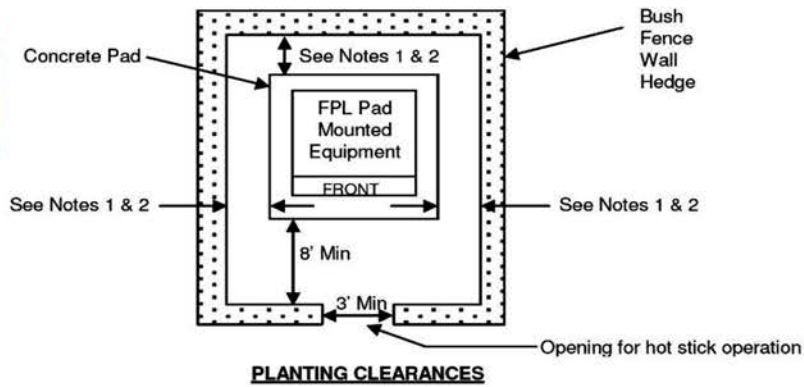
FIGURE V-1

Protective Barrier and Planting Clearances for Padmounted Transformers and Switches



Note 1: Padmounted Transformers and pad may be located minimum 3' on both sides and back side only. An 8' minimum is required on the front side for access and hot stick operation.

Note 2: Padmounted Switches and Cap Banks require 8 feet of clearance on all sides.





FPL's liquid-filled transformer installed west of Building 9300 in South Winds Condominium



FPL's liquid-filled transformer installed east of Building 9300 in South Winds Condominium



FPL's liquid-filled transformer installed northeast of Building 9310 in South Winds Condominium



FPL's liquid-filled transformer installed southeast of Building 9310 in South Winds Condominium



FPL's liquid-filled transformer installed east of Building 9320 in South Winds Condominium

EXHIBIT G



FPL's liquid-filled transformer installed west of Building 9340 in South Winds Condominium

EXHIBIT H



FPL's liquid-filled transformer installed northeast of Building 9311 in South Winds Condominium



FPL's liquid-filled transformer installed southeast of Building 9311 in South Winds Condominium



FPL's liquid-filled transformer installed east of Building 9301 in South Winds Condominium

EXHIBIT K



FPL's liquid-filled transformer installed west of Building 9301 in South Winds Condominium