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November 15, 2018

VIA: ELECTRONIC FILING

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


Re: Docket No. 20180145-EI – Review of 2019-2021 storm hardening plan, Tampa Electric Company

Dear Ms. Stauffer:

Attached for filing in the above docket is Tampa Electric Company's Responses to Staff's First Data Request (Nos. 1-6) dated September 11, 2018.

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

JDB/pp
Attachment

cc: Johana Nieves (w/attachment)

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1. *Commission staff should collect additional details regarding meeting with local governments regarding vegetation management and identification of critical facilities as part of the Commission’s review of utility storm hardening plans.*

Please discuss the Utility’s coordination with local governments. As part of this discussion, please describe any lessons learned following recent storm events.

Additionally, please complete the table below for the year 2018.

Meetings with Local Government					
Entity	Date(s)	Topics	Pending Issues/Follow-up Items	Contact information provided to local authorities	
				Y	N

A. Vegetation Management

Tampa Electric’s Community Relations Department is tasked with communicating with local and state governmental officials, residential and commercial customers on several topics, including vegetation management.

During each year, Tampa Electric’s Community Relations Department team members will have conversations with local and state governmental officials on vegetation management or other topics such as planning future joint emergency recovery strategy and the sharing of resources to clear roads of power lines after hurricanes. In addition, many times Tampa Electric’s Community Relations Department learns of a potential vegetation management issue through a local or state governmental office or official. In these cases, the company will contact the customer and listens to their concerns and depending on the issue will work with the company’s Line Clearance Department to mitigate the issue. If the vegetation issue brought up involves new distribution or transmission lines, Tampa Electric’s Community Relations will assist the company’s Project Management and Corporate Communication teams with communicating to property owners

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and residents the need to perform extensive tree trimming and/or removal to accommodate the installation of new lines.

The company's goal is to keep governmental officials aware and briefed on relevant issues regarding these topics while working with internal Tampa Electric Departments to resolve vegetation management issues in and around the company's infrastructure in a timely and responsive manner.

The table below provides the dates that Tampa Electric met with local governments during 2018 that involved discussions with vegetation Management:

Meetings with Local Government					
Entity	Date(s)	Topics	Pending Issues/Follow-up Items	Contact information provided to local authorities	
				Y	N
City of Temple Terrace	5/7/18	Update on emergency preparation at the City's Annual Hurricane Briefing	None	X	
City of Plant City	8/30/18	Push Crew options with City Manager	None	X	

Identification of Critical Facilities

Tampa Electric works closely with County Emergency Management ("EM") officials and other stakeholders throughout the year to identify and prioritize facilities deemed most critical to the overall health of the whole community (e.g., public health, safety, security or national/global economy). Tampa Electric has discussions with EM officials through face-to-face meetings/contacts, in a working group setting, or through email or phone communications. The identification of public and private critical facilities during preparedness planning supports the goal of a coordinated and flexible restoration process for all critical infrastructure and is directly related to

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business continuity and continuity of the government. Critical facilities for municipalities are identified and incorporated into the respective County data.

In addition, on an annual basis, the company's Emergency Management Department shares current contact information with EM officials for primary coordination and Emergency Operations Center ("EOC") activation.

Tampa Electric views one of the challenges in identifying and incorporating critical facility information is timing. Information is often not received to meet the company's deadlines for inclusion for the current storm season. Because of internal processes and workflow needed to determine priority of circuits for restoration and plan updates, information not received from EM officials in a timely manner may not be included until the following year.

The table on the following page provides the dates that Tampa Electric met with local governments during 2018 that involved discussions with critical facilities:

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Meetings with Local Government					
Entity	Date(s)	Topics	Pending Issues/Follow-up Items	Contact information provided to local authorities	
				Y	N
Hillsborough County	4/13/2018 5/01/2018 6/04/2018	Critical Facility Discussion	<ul style="list-style-type: none"> • Reprioritization of Port Tampa Bay fuel facilities • Priority differentiation between home-based Assisted Living Facilities (ALF) and larger bed ALFs • Public shelter list still under development 	X	
Pasco County	1/31/2018 5/18/2018	Critical Facility Discussion	<ul style="list-style-type: none"> • Need updates for water/wastewater facilities 	X	
Pinellas County	5/10/2018 8/8/2018 9/25/2018	Critical Facility Discussion		X	
Polk County	3/26/2018	Critical Facility Discussion	<ul style="list-style-type: none"> • Need updates for water/wastewater facilities 	X	

2. *Commission staff should collect additional details regarding utility staffing practices at local EOCs as part of the Commission’s review of utility storm hardening plans.*

Please discuss the Utility’s planned staffing practices at local EOCs. Please address in this discussion the total number of Utility personnel available to work in EOCs, the responsibilities of Utility personnel that work in EOCs, how the Utility communicates with EOCs that may not be staffed, and any lessons learned from storm events.

Additionally, please complete the table below, listing all local EOCs in Utility’s service territory.

Utility staffing practices at local EOCs		
EOC in Service Territory	Number of Utility staff	Planned daily hours scheduled for working in the EOC

A. Utility Planned Staffing Practices at Local EOCs

Tampa Electric provides representatives to each of the four (4) County EOCs within the company’s service territory, including Hillsborough, Pasco, Pinellas and Polk counties. In addition, depending upon the magnitude of the event, representatives are provided to the four (4) municipalities (Cities of Oldsmar, Plant City, Temple Terrace, and Tampa), when requested. The number of liaisons provided is dependent upon various factors (e.g., seating capacity at the EOC, amount of damage, EOC operating hours, available personnel, etc.). Lastly, representatives are also provided to support the State of Florida EOC to support the State and the Florida Public Service Commission (“FPSC”) for power restoration issues.

The representatives who staff the EOCs have business acumen and experience in customer service and/or electric or gas distribution. Since the EOC representative role is not a day-to-day job function, the company strives to maintain a balance of seasoned and less experienced representatives during both day and night operations in the EOC when possible. In some EOCs, the company utilizes representatives from the gas company (Peoples Gas System) to supplement Tampa Electric personnel, especially in areas

where the company has a natural gas presence. In any case, EOC representatives are trained to deal with both electric and gas issues.

Staffing hours at the EOC are dictated by each EOC's operational periods and are dependent upon the magnitude of the event. EOCs have and may require company representatives to report for duty before the onset of tropical storm force winds and ride-out the storm at the EOC with other Emergency Support Function ("ESF") personnel. Initially, EOCs may, at their discretion, operate 24 hours/day until the event is stabilized. To support the 24-hour cycle, company staffing hours at EOCs are generally based on two (2) 12-hour shifts based on the EOCs operational cycle and vary by County; however, the hours of operation may be adjusted based on EOC needs to support emergency response.

Responsibilities

The role of the company's EOC representative is to facilitate and respond to critical community issues in support of life safety and power restoration efforts. The representatives are responsible for maintaining situational awareness and communicating any public safety issues or concerns to the company. In addition, the representatives work closely with other ESF liaisons to facilitate or coordinate any requests made by the company or in support of community citizens. The representatives will utilize all available "lifelines" to respond to requests which originate from the EOC or company personnel. Lastly, the EOC representative communicates outage updates and provides restoration status, as requested.

Communications

Because the company has representatives dedicated to each of the county and city EOCs within its service territory, there are limited opportunities for an EOC to not be staffed. In the remote situation where an EOC representative is unavailable, the local EOCs have contact information for their assigned EOC representatives, as well as the company's Emergency Management personnel, which can be called upon for assistance. In addition, the company's Community Relations Department personnel have established relationships throughout the communities served and are also available to provide support, as needed.

Lessons Learned

The first 24-36 hours after an incident are challenging, especially for those staying overnight at their respective EOCs, away from their families, and then awaiting relief personnel to arrive after conditions are safe to travel. Fatigue can be an issue, especially since some EOCs are not equipped with sufficient sleeping quarters for those asked to stay overnight. This concern has been identified within city and county EOCs After Action Reports. As an alternative, the company may seek to purchase cots for EOC personnel, unless EOCs make other arrangements.

Another lesson learned involves shift schedules. After the 24-hour cycle ends, the EOCs may operate a reduced 18-hour cycle for some ESFs, including ESF-12 (Energy). However, if a shift begins at 7AM and ends at 7PM, the second shift may only work 5-6 hours. As a result, the company's EOC leader has discretion to modify shifts to provide a better balance of resources, allowing for adequate rest.

The table below further shows the number of company representatives available to support EOC activation. The table does not represent the number of representatives on-site at the same time.

Utility staffing practices at local EOCs		
EOC in Service Territory	Number of Utility staff	Planned daily hours scheduled for working in the EOC
Hillsborough County	6-8	Dependent on EOC operational period
City of Plant City	2	Dependent on EOC operational period
City of Oldsmar	2	Dependent on EOC operational period
City of Tampa	4	Dependent on EOC operational period
Pasco County	4	Dependent on EOC operational period
Pinellas County	3	Dependent on EOC operational period
Polk County	3	Dependent on EOC operational period

3. *Commission staff should collect information on how each IOU prepares for and responds to roadway congestion, fuel availability, and lodging accommodation issues as part of the Commission's review of utility storm hardening plans.*

Please discuss the Utility's contingency planning for roadway congestion, fuel availability, and lodging accommodation including a timeline for when decisions are made (i.e. route selection, procuring fuel, locating of fuel sources, procuring lodging). As part of this discussion please describe any lessons learned following recent storm events as well as a discussion regarding the use of government resources during a storm event.

A. **Roadway Congestion:**

In the event of roadway congestion that is impacting travel by foreign crews into Tampa Electric's service area, the company will seek to resolve the situation by obtaining information through various sources to find an alternative route. In the event that traffic congestion is so pervasive that there are no available alternative routes, Tampa Electric will work through company representatives at local Emergency Operations Centers ("EOC") or the State of Florida EOC depending on the location, nature and severity of the congestion. The company's representatives will communicate the situation to the law enforcement or appropriate Emergency Support Function ("ESF") personnel to obtain assistance.

Fuel:

Tampa Electric has agreements in place with two bulk fuel vendors to supply diesel and gasoline fuel on a daily/ as needed basis in response to a storm event. The company also has an agreement with one mobile fuel vendor.

Prior to the storm: Upon notification the bulk fuel vendor(s) will top off Tampa Electric's on-site fuel storage tanks which consists of 50,000 gallons of diesel and 50,000 gallons of gasoline.

During the storm: The bulk fuel vendor(s) will top off the on-site fuel storage tanks as described above daily or as needed. These vendors typically obtain their fuel supply from Port Tampa Bay. In the event that the Port Tampa Bay is unable to supply fuel, the vendors will obtain their fuel supply from a main fuel supply facility in Georgia.

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The mobile fuel vendor will provide 500-gallon bulk fuel tanks to each incident base Tampa Electric establishes to support restoration efforts. The mobile fuel vendor will also fuel all Tampa Electric, Tampa Electric's native crews and any foreign crew resource vehicles that are being used to assist the company in restoration of the system during a storm event on a daily basis after hours at each incident base.

Lodging Accommodations:

Lodging accommodations are acquired, when the leadership of Tampa Electric's Electric Delivery department deems it is necessary to bring "foreign crew" resources into Tampa Electric's service area to support power restoration. The amount of lodging accommodations is based on the forecasted severity of the storm, strength, storm surge and the path of the storm. Tampa Electric's Electric Delivery department will estimate the damage to the area, and the number of power outages that will affect the company's customers, to determine the number of resources needed to help with power restoration. Once the decision to request outside resources is made, Tampa Electric's Logistics Chief will activate those company employees that make up the lodging unit to start acquiring hotel rooms and/or alternative housing.

TECO Services' Real Estate Department and Logistics section keeps a list of hotels of which there are verbal agreements to utilize hotel rooms in their establishment if they are available. It is customary to double-bunk (two people) to a room. The rooms are secured pre-storm for post-storm occupancy.

During Hurricane Irma, the company utilized alternate housing due to the amount of external resources assisting the company in restoration efforts. Tampa Electric placed cots and mattresses in open gym style facilities, as well as acquiring camp style facilities. After the storm had passed, some of the hotels reserved, either sustained damage and/or lost power, making the rooms unusable. Hotels were also spread far beyond Tampa Electric's service area which created transportation issues for the crews to arrive in their working area. Because of the diversity of issues the company had to promptly deal with to accommodate adequate lodging, the company was provided with valuable lessons learned in lodging for use in future large storm restoration efforts.

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4. *Commission staff should collect information on all viable alternatives considered before selecting a particular storm hardening project as part of the Commission's review of utility storm hardening plans.*

Please discuss the Utility's process for identifying storm hardening projects. Please include in this discussion, information regarding the economic considerations, historic reliability considerations, geographic area (including weather impacts), and customer considerations (number of customers).

Additionally, please provide an example of a storm hardening project where alternatives were considered and explain why one alternative was considered over another.

- A. Tampa Electric identifies potential storm hardening projects by considering the following factors:
1. The impact extended outages could have on safety and public health.
 2. The number of potential customers directly or indirectly affected by an outage.
 3. Probable detrimental impacts to the environment.
 4. Economic losses that could be sustained due to lengthy outages.
 5. Geographic regions that may prove difficult to access after a major storm.

Tampa Electric generally does not use historic reliability factors to identify storm hardening projects. Instead, circuits/feeders or portions thereof with sub-par performance are addressed as part of the company's annual reliability plan. In Tampa Electric's experience, there are other factors which contribute to the sub-par performance of circuits/feeders such as faulty material/equipment, electrical coordination issues, vegetation, etc.

One example of an extreme wind hardening project Tampa Electric completed involved hardening the service to the Tippins Water Treatment Plant in Tampa. This facility supplies 95 percent of the 68 million gallons of water-per-day consumed by Tampa Water Department customers. An extended outage at this facility will affect a significant number of customers in addition to the lack of clean water for an extended period poses significant health issues. An outage at this plant will also make it difficult for businesses to remain open, minimizing the opportunity to serve the community and the potential loss significant revenue. Tampa Electric considered

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undergrounding at least one of the two circuits that feeds this facility. The decision was made to underground a portion of the lines that went through an area with significant tree canopy and upgrade the poles on the primary circuit to meet extreme wind loading criteria. The company chose not to underground the entire circuit due to excessive costs that would have been incurred due to the existing infrastructure that Tampa Electric would have had to circumvent. In addition, there also would have been a significant impact to customers in the area due to the amount of construction required to remove and install new infrastructure.

Another extreme wind hardening project completed was at Port Tampa Bay. Central Florida relies on the Port Tampa Bay to supply most of the vehicular and aviation fuel. An extended outage at this location would impede the flow of fuel required for daily routine and critical activities. Customers and businesses would be unable to effectively use vehicles to perform essential tasks and services. The company made the decision to maintain the overhead construction and upgrade the poles to meet extreme wind loading criteria. The decision to maintain the system overhead was due to two important conditions. The main reason is due to the ports location and proximity to Tampa Bay which would have exposed an underground distribution system and associated equipment to potential and significant saltwater intrusion and corrosion which increased the probability of a premature failure. The second reason was Port Tampa Bay has not had any significant outages related to vegetation.

In addition to these two hardening projects above and the others the company has performed, in 2019, Tampa Electric is planning on undertaking two additional hardening projects. One is to underground the 69 kilovolt ("kV") transmission circuit that connects two of the company's substations that supply power to the Tampa International Airport ("TIA") and many other surrounding customers. The other project is to relocate the existing bridge mounted distribution circuits feeding Tampa General Hospital and convert this cable crossing to underground beneath the river.

The transmission circuit feeding TIA Airport is in an area exposed to tidal flow which has led to deterioration of the transmission infrastructure. Repairs are difficult and require special marine equipment to access the structures. Tampa Electric also took into consideration the National Electrical Safety Code ("NESC") changes that requires 40.5 feet of clearance required over navigable waterways. During original construction of this transmission line the NESC only required clearance of 22.5 feet. In addition, due to Federal Aviation Administration ("FAA") restrictions, Tampa Electric was unable to

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acquire lands from the airport needed to relocate the transmission lines inland. It was also determined that the new line could not be re-constructed in the bay due to height requirements to comply with NESC would have created a conflict with FAA height restrictions. After examining the constraints of the project, the only prudent option to harden this important transmission section is to place it underground.

Tampa General Hospital is a level one trauma center and one of four burn centers in Florida. The hospital maintains a five-helicopter fleet that serves about 23 Florida counties. The hospital is located on Davis Island which is subject to major storm surge in the event of a major storm. Currently, the circuits that feed Tampa General Hospital are attached to a bridge that is projected to be impacted during a large storm event. Hardening plans are to re-feed the hospital by burying two primary circuits/feeders under the channel. This plan would reduce the likelihood of losing power to one of the most critical medical facility serving the area and/or speed up restoration efforts in the event the distribution service was lost.

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5. *Commission staff should explore the collection of uniform performance data for hardened vs. non-hardened and underground facilities, including sampling data where appropriate, as part of the Commission's review of utility storm hardening plans.*

Please discuss the type of data the Utility plans to provide demonstrating performance of hardened vs. non-hardened facilities affected by wind only. Please discuss the type of data the Utility plans to provide to compare overhead to underground facilities on a comparable basis. Please discuss any sampling data that may be readily available. Please include the format, economic considerations, and how the Utility would collect this data.

- A. Tampa Electric defines hardened distribution facilities as those that have been upgraded to meet current NESC Grade B construction. In addition, Tampa Electric has also selectively hardened overhead distribution facilities to extreme wind standards and deployed submersible underground equipment in areas prone to water intrusion and/or subjected to storm surge.

Tampa Electric plans to collect data on distribution facilities that were impacted by significant winds related to severe storms. This data will include the type of facility damaged (broken or leaning poles), downed/broken wires, cause of damage (trees, debris, wind, etc.), damage location, and identify if structures were previously hardened.

The company will compare damage to overhead hardened structures to damage of underground facilities in the same geographic areas. The assumption is that facilities in similar geographic regions would have been exposed to similar storm conditions. The data collected on the overhead facilities will be the same as described above. The data collected on the underground system will include damage to padmounted equipment (repaired, replaced, repositioned, etc.). The comparison will be based upon the amount of equipment, overhead and underground, exposed to the storm elements (wind/flooding/storm surge) and the percentage of damage experienced.

The company will also review the performance of the extreme wind projects to determine the type facility damage and reason. This information will be used to improve extreme wind construction requirements and determine if further projects are feasible.

Tampa Electric will utilize trained Damage Assessors ("DA") to collect data on damage immediately after the storm. This data sample will be used to

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calculate global Estimated Time of Restoration (“ETR”) and equipment and manpower requirements. This data sample should be readily available shortly after the storm has passed. In addition, the DAs will attempt to collect and document all information on damaged infrastructure. This information will be reviewed and analyzed by the company’s Distribution Engineering and Standards and Asset Management teams. After the analysis is complete, the information and conclusions would be presented in a spreadsheet format identifying the type of damage (pole, wire, etc.), amount of damage, location, and reasons (tree, debris, wind, etc.).

During a storm event the company will place the priority on the safe, efficient and prompt restoration of the electrical system. Tampa Electric recognizes that storm restoration will take priority over damage collection and reporting. In the event a catastrophic storm impacts the service territory, damage assessment and data collection may be adversely impacted depending on the situation. The company commits to provide the most accurate information under the most difficult circumstances.

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6. *Commission staff should seek additional information on the impact of non-electric utility poles on storm recovery as part of the Commission’s review of utility storm hardening plans.*

Please discuss the following:

- a. Procedures followed if a non-electric utility pole is identified as being unstable or on the verge of failing.
- b. Options an electric utility has if inspection of non-electric utility poles is not occurring.
- c. Procedures followed when repairing/replacing non-electric utility poles during storm recovery (contact, billing, reimbursement, who does the repair).
- d. Procedures followed when repairing/replacing non-electric utility poles during non - storm events (contact, billing, reimbursement, who does the repair).
- e. General locations of poles – throughout the service territory or in a certain location.

Additionally, please complete the table below.

Electric vs. Non-Electric Utility Poles							
Total Number of Utility Distribution Poles		Total Number of Non-Electric Utility Distribution Poles that the Utility is attached to		Number of Attached Non-Electric Utility Distribution Poles Repaired following Irma		Number of Attached Non-Electric Utility Distribution Poles Replaced following Irma	
Feeders	Laterals	Feeders	Laterals	Feeders	Laterals	Feeders	Laterals

- A. a. If the company finds a non-electric utility pole and determines that pole is unstable or on the verge of failing, the company will make the pole safe and will contact the owner of the pole.

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- b. Tampa Electric requires foreign-owned wood poles with the company's facilities attached to be inspected. The poles are visually inspected and sounded. The company also requires a "Silver Tag" that has six digits affixed to the pole for tracking purposes. The company does not require foreign-owned wood poles to be excavated or bored inspected. In the event that a foreign-owned wood pole is suspect, the company will record the pole and suspected issue. The company will contact the owner of the pole for follow up.
- c. Tampa Electric currently does not track this information during a large storm restoration event.
- d. If a non-electric utility pole is found that is need of repair or replacement during a non-storm event, the company will make the pole safe and will contact the owner of the pole.

If the pole is identified during an emergency, restoration or is needed to provide electrical service to a customer and must be replaced, the company will replace the pole on-site and will notify the owner of the pole after the fact. The notification follow-up will also include an invoice for the cost to replace the pole.

- e. Tampa Electric utilizes foreign-owned wood poles throughout the company's service area mainly for service lines.

Electric vs. Non-Electric Utility Poles							
Total Number of Utility Distribution Poles		Total Number of Non-Electric Utility Distribution Poles that the Utility is attached to		Number of Attached Non-Electric Utility Distribution Poles Repaired following Irma		Number of Attached Non-Electric Utility Distribution Poles Replaced following Irma	
Feeders	Laterals	Feeders	Laterals	Feeders	Laterals	Feeders	Laterals
215,870	47,040	0	13,440	0	0	0	0