

Antonia Hover

From: Adam Teitzman
Sent: Monday, July 15, 2019 5:31 PM
To: 'kcisarik@aol.com'
Subject: RE: Concerns about rule development for Storm Protection Plans Docket #20190131

Ms. Cisarik,

Your letter is being placed in the docket file.

Please send any future correspondence to clerk@psc.state.fl.us. That email address is monitored by the Clerk's Office staff every day. The reason we recommend you send your submissions to that address is that if I am out of the office or for whatever reason I don't have access to email, your submission will still be processed as soon as possible.

Thank you!

Best Regards,

Adam J. Teitzman

Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399
Adam.Teitzman@psc.state.fl.us
850.413.6826

From: kcisarik@aol.com [mailto:kcisarik@aol.com]
Sent: Monday, July 15, 2019 4:55 PM
To: Adam Teitzman
Subject: Concerns about rule development for Storm Protection Plans Docket #20190131

Dear Adam,

I am providing my public comments on the Rule Development Process for **Public Utility Storm Protection Plans & related Cost Recovery** in the letter below. Could you please copy this email to the commission, appropriate staff and all interested parties and also make my comments part of the docket # 2019031?

Thank You !

Kelly Cisarik

Subject: Public Comments about the rule development process for Public Utility Storm Protection plans & related cost recovery (PSC Docket #20190131).

Dear Commissioners and Staff,

I have serious concerns related to the rule development process for Public Utility Storm Protection plans (PSC Docket #20190131). This Rule Development Process relates to recent passage of Senate Bill 596. I recognize that with passage of this new law the PSC has been assigned with an arduous task to do rule development over the next three and a half months that will impact Florida's electric grid for several decades. These rule changes will guide the spending of huge sums of ratepayer funds, and there will no doubt be a lot of debate about the equity of the new payment regime.

The issue that worries me the most, and may be the most contentious involves rule development for future placement of underground electric projects in flood zones, and particularly about the placement of transformers and switch gears in those zones. In my 27 years living next to a salt water body, I have become painfully aware that salt water is very corrosive to most metals including steel, copper, aluminum and even some stainless steels. There is an urgent need to establish firm rules for storm hardening projects in flood zones. This is not just because of a higher risk of corrosion near salt water. The biggest risks are from future storm surge and increasing frequency of fair weather high tides or "King Tides." NOAA just came out with their annual report on future storm surge risk, and it is not pretty. Utilities have largely been permitted to establish their own best practices for flood zones in the past, but I feel strongly that best practices need to be replaced with some PSC mandated rules.

The Florida Building code mandates specific rules to require elevation of air conditioning equipment and utility electrical box connections where they go into buildings but our electric utilities are not subject to that code or to FEMA guidelines. The National Electric Code and NFPA 70 provides national guidelines for electric equipment but my understanding is that in Florida, there is no mandate that requires independent third-party testing of fully assembled components.

Could staff respond and can tell me which of the 14 rules outlined in this docket could currently address or be revised to address the concerns that I bring up below?

- 1. For Flood Zone use, can you tell me if there are any current rules that require manufacturer or utility company testing of transformers and switch gears and who is certified to do that testing?** For example, is there an independent group like Underwriters Laboratory that must certify that assembled electrical components for flood zone uses are rated as water tight?
- 2. Would new rules be required to allow the PSC to make sure components of underground systems have been rigorously tested *before* they are funded and permanently installed?**
- 3. In Flood zones, will utilities still be permitted to self-regulate when city and county funding is used to to upgrade projects to do undergrounding? ie who will decide placement of transformers and switch gears and will those components be permitted to be placed at ground level in flood zones?**
- 4. Is any climate change modeling being incorporated into the rules for storm hardening plans?**
- 5. Will beautification projects be funded if they have some secondary benefits as storm hardening? How can you separate storm hardening from beautification ?**

I have serious and realistic concerns that beautification projects will be making their way into storm protection plans. With few exceptions, Florida's wealthiest cities are located along the coast. Wealth and political clout go hand in hand. In Pinellas County, I have watched for two decades as coastal city leaders have urged our county to give them funds to put utilities underground along Gulf Boulevard,

our coastal road. This process is ongoing. My home town of Indian Rocks Beach is currently utilizing Duke Energy to complete an undergrounding project. Duke is putting transformers on concrete pad just a few inches off the ground. This is in an area where the intracoastal waterway is just to the East of the underground utilities and the Gulf of Mexico is just to the West. Projects like ours are supported by the local Tourist Development Council and by various organizations that support the interests of the retail and tourist industries. There are many groups that would love to have coastal undergrounding projects included in Storm Hardening Plans. Should ratepayers statewide be asked to pay for projects like these that are primarily for beautification ?

In Duke's recently approved 2019-2021 storm hardening plan, they show transformers for use in salt water exposed areas are supposed to last 30 years. Is that lifespan realistic in coastal zones? According to a new NOAA report we are projected to have 190% more days of flooding days from fair weather high tides or King Tides in the coming decades. I'm concerned that in some areas we have been building a "Sand Castle Grid" and would like to be assured that pad mounted transformers can survive a 6 foot storm surge. Has the commission reviewed a detailed report on how Duke's pad mounted transformers held up on St. George Island in Franklin County after Hurricane Michael? Are there other reports post Hurricane Irma from other IOUs on how pad mounted transformers held up?

With passage of Senate Bill 596 the method of cost recovery within public utility storm hardening plans has dramatically changed to cause rate payers system-wide to be required to cover the up-front costs for storm hardening. I feel the rules process needs some dramatic changes to reflect the PSC's responsibility to the public to ensure that projects that are funded are well tested and long lasting. I hope you share my concerns and I hope you will put in place rules to address them during the Rule Development Workshops over the next 3 months.

Sincerely,

Kelly Cisarik
Duke Energy Customer
Indian Rocks Beach, FL

cc. Governor Rick DeSantis via mail

Antonia Hover

From: Antonia Hover
Sent: Wednesday, July 17, 2019 3:53 PM
To: Consumer Contact
Subject: FW: Concerns about rule development for Storm Protection Plans Docket #20190131

Please see consumer comment below.

Thanks.

From: Adam Teitzman
Sent: Monday, July 15, 2019 5:05 PM
To: Antonia Hover
Cc: Hong Wang
Subject: FW: Concerns about rule development for Storm Protection Plans Docket #20190131

Customer Correspondence for Docket No. 20190131.

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