

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

BELLSOUTH TELECOMMUNICATIONS,\*  
LLC D/B/A AT&T FLORIDA \*

Complainant, \*

v. \*

FLORIDA POWER AND LIGHT  
COMPANY, \*

Respondent. \*

Proceeding No.: 20-214  
File No.: EB-20-MD-002

**FLORIDA POWER & LIGHT COMPANY'S  
THIRD SUPPLEMENTAL RESPONSES  
TO AT&T'S FIRST SET OF INTERROGATORIES**

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Defendant Florida Power & Light Company ("FPL"), pursuant to Rule 1.730, submits the following third supplemental responses to the "First Set of Interrogatories" served by Complainant Bellsouth Telecommunications, LLC d/b/a AT&T Florida ("AT&T").

**General Response**

FPL adopts and incorporates, as if fully set forth herein, its July 17, 2020 Opposition and Objections to AT&T's First Set of Interrogatories. All responses set forth herein are subject to the July 17, 2020 Opposition and Objections to AT&T's First Set of Interrogatories.

The responses set forth herein are based on information presently known and available to FPL. FPL reserves the right to supplement these responses as additional information becomes known or available through the discovery process or otherwise.

## Responses to Individual Interrogatories

**Interrogatory No. 4.** On an annual basis from 2011 forward, identify the number of poles FPL replaced or relocated pursuant to a Storm Hardening Plan and the amount that the Florida Public Service Commission has authorized FPL to recover in its electric rates or otherwise for the removal and disposal of the poles replaced or relocated in connection with a Storm Hardening Plan. Provide the amount as a total amount, annual amount, and per-pole amount, and include all support for FPL's calculation.

**Objection.** FP&L objects to this interrogatory as being overly broad in scope and burdensome as it would take a significant amount of resources and expense to gather and provide the requested data dating back to 2011. In seeking historic information dating back to 2011, this interrogatory seeks information entirely irrelevant to this proceeding and not related to any claim or defense at issue.

**Supplemental Response.** Subject to and without waiver of the above objection and the general objections contained in FPL's July 17, 2020 Opposition and Objections, the information requested regarding FPL's Storm Hardening Plan can be found in Florida Commission Docket Nos. 130132, 150061, 20180144.

**Second Supplemental Response.** Notwithstanding and without waiving the objections set forth above and general objections contained in FPL's July 17, 2020 Opposition and Objections, FPL states that Table 1 below sets forth the number of pole replacements FPL completed for 2015 through 2019. Information prior to that time is not available.

The cost of removal approved by the Florida Public Service Commission ("FPSC") is a percentage of the cost of the original pole installation. By Order No. 16-0560-AS-EI, dated December 15, 2016, the FPSC approved a rate of 60 percent. However, that amount only covers

a portion of FPL's actual cost, which averaged \$749 during the 2015 to 2019 timeframe as shown in Table 2.

<b>TABLE 1</b>	
<b>Year</b>	<b>Poles</b>
2015	16,185
2016	20,136
2017	18,637
2018	28,022
2019	24,451

<b>TABLE 2</b>					
	<b>2015</b>	<b>2016</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Total Cost to Pull Pole (\$Millions)	\$ 4.4	\$ 9.4	\$ 10.9	\$ 11.0	\$ 15.6
Count of Poles Pulled	7,528	17,473	20,214	15,615	11,387
Cost Rate per Pole Pulled	\$ 589	\$ 538	\$ 538	\$ 705	\$ 1,377

The cost shown in Table 2 reflects the cost for removal of any distribution pole. The total cost to remove a distribution pole includes pole removal, sidewalk repairs, permits, and disposal. These categories of cost do not vary according to the reason for the removal; the same removal activities would be required whether the pole was replaced for hardening, the pole had reached the end of its useful life, or simply was no longer needed for the provision of electric service to FPL's customers. Any amount paid by AT&T for the abandoned poles, due to transfer of ownership, will be credited to FPL customers.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2020, I caused a copy of the foregoing to be served on the following by hand delivery, U.S. mail or electronic mail (as indicated):

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