

November 10, 2021

***Via Electronic Filing***

Adria E. Harper  
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Florida Public Service Commission  
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Re: Docket No. 20210138-PU; Proposed Adoption of Rule 25-18.020, F.A.C.;  
Commission Staff Data Request

Dear Ms. Harper:

Frontier Florida LLC ("Frontier") provides its response to the October 21, 2021 Commission Staff Data Request in the above docket as follows:

1. Please provide the total number of poles owned by your company that have public utility attachments.

**Response:** Frontier's records reflect that it currently owns 23,059 poles in Florida that have public utility attachments.

2. Please provide the current maintenance inspection cycle or schedule for poles with public utility attachments.

**Response** Frontier does not have a set maintenance inspection cycle or schedule for its poles in Florida with public utility attachments. Instead, before touching a pole when performing work in the field, Frontier's techs must both visually inspect the pole and test it for soundness. Any pole that has an unsafe condition or is unsound is replaced. In addition, poles are routinely replaced whenever local officials or residents call to report unsafe conditions. Frontier's experience in other states shows that having a separate program to test and treat poles does not provide any benefit either financially or in terms of reducing risk or liability.

3. Please provide the current maintenance techniques used for poles with public utility attachments.

**Response:** See Frontier's response to question 2.

4. For your most recent maintenance inspection cycle/schedule for poles identified in question 1, please provide the following information:

- a. The number of poles that were scheduled for inspection;
- b. The number of poles actually inspected;
- c. The number of poles that failed inspection;
- d. The number of poles strength tested;
- e. The number of poles that failed strength testing;
- f. The number of poles repaired and a summary of the repairs;
- g. The number of poles replaced and reason for replacement;
- h. The number of poles relocated and reason for relocation;
- i. The total miles of vegetation management conducted; and
- j. The total miles of vegetation management conducted for each technique used.

**Response:** As set forth in Frontier's response to question 1, it does not maintain a set maintenance inspection cycle/schedule for its poles that have public utility attachments. Therefore, Frontier does not currently track this data in the manner requested.

5. Please provide the criteria/standards used for replacement of existing poles with public utility attachments.

**Response:** Frontier utilizes the standards set forth in the National Electric Safety Code published by the Institute of Electrical and Electronics Engineers (the "NESC") and the Blue Book Manual of Construction Procedures published by Telecordia Technologies Inc. (the "Blue Book").

6. Please provide the criteria/standards used for construction of new poles with public utility attachments.

**Response:** See Frontier's response to question 5.

7. Please provide the criteria/standards used for the repair of existing poles with public utility attachments.

**Response:** Frontier does not repair poles with public utility attachments. See Frontier's response to question 2.

8. Please explain how the company ensures its poles with public utility attachments meet National Electric Safety Code (NESC) strength and clearance requirements.

**Response:** See Frontier's response to question 2.

9. Please provide the vegetation management schedules for poles with public utility attachments. As part of your response, please also identify and explain the types of vegetation management techniques utilized.

**Response:** Frontier is not authorized under its joint use agreements with public utilities to perform any work, including but not limited to vegetation management, in the electric space on its poles with public utility attachments. Because of the dangers inherent in working near electric facilities, public utilities retain the responsibility for performing any vegetation management necessary to maintain proper clearances for their own lines.

For areas below the electric space, Frontier does not have a set vegetation management cycle schedule for its poles in Florida. Instead, before touching a pole when performing work in the field, Frontier's techs must clear any excess vegetation at the pole's base utilizing hand tools or appropriate pesticides.

10. Please provide a description of your company's emergency response and storm restoration procedures and protocols with respect to poles with public utility attachments.

**Response:** Please see the attached description of Frontier's Business Continuity Planning Program.

11. Please file at least two of your company's attachment agreements that demonstrate the standard or general terms that are contained in these types of agreements.

**Response:** Frontier objects to this question to the extent it seeks the production of information concerning confidential contractual data, the disclosure of which would impair Frontier's efforts to contract for goods and services on favorable terms and is protected by Fla. Stat. § 363.183(3)(d). Subject to and without waiving this objection, Frontier is simultaneously filing with the Commission Clerk a request for confidential classification of certain portions of its Joint Use Agreement with Tampa Electric Company, effective January 1, 2016 (the "Tampa Electric Agreement") and its Joint Use Agreement with Duke Energy Florida, LLC, effective November 12, 1974 (the "Duke Agreement").

With respect to the Duke Agreement, Frontier further notes that the parties have executed multiple amendments, some of which are confidential, but that those amendments only address pole rental rates. Frontier and Duke have conferred on this issue, and because rental rates are irrelevant to the present rulemaking proceeding, neither party is producing copies of the Duke Agreement's various amendments.

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12. Do your company's attachment agreements with public utilities reference any standards codes, or requirements in regard to pole maintenance or inspection? If yes, please provide an example of the standards, does, or requirements included in the agreement.

**Response:** Yes. Please see Tampa Electric Agreement, §§ 1(a), 2(h), 13, and 14, and Duke Agreement §§ 1.1.1 and 6.1 and Art. VIII.

Thank you for your attention to this matter. Please let me know if you have any questions or concerns.

Best regards,



Gregory C. Brubaker

Enclosure

cc: Allison Ellis (via electronic mail only)  
Angie McCall (via electronic mail only)