**Dulaney L. O'Roark III** Vice President & General Counsel, Southeast Region Legal Department



Six Concourse Parkway Suite 800 Atlanta, Georgia 30328

Phone 770-284-5498 Fax 770-284-5488 de.oroark@verizon.com

May 30, 2007 - VIA ELECTRONIC MAIL

Ann Cole, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 070297-EI Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by Tampa Electric Company

Docket No. 070298-EI Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by Progress Energy Florida, Inc.

Docket No. 070301-EI Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by Florida Power & Light Company

Dear Ms. Cole:

Enclosed are the Preliminary Comments of Verizon Florida LLC for filing in the abovereferenced matters. Service has been made as indicated on the Certificate of Service. If there are any questions regarding this filing, please contact me at (770) 284-5498.

Sincerely,

s/ Dulaney L. O'Roark III

Dulaney L. O'Roark III

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Enclosures

## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by Tampa Electric Company	) ) ) )	Docket No. 070297-EI Filed: May 30, 2007
In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by Progress Energy Florida, Inc.	) ) )	Docket No. 070298-EI
In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by Florida Power & Light Company	) ) )	Docket No. 070301-EI

## PRELIMINARY COMMENTS OF VERIZON FLORIDA LLC

In response to Staff's Memorandum dated May 14, 2007, Verizon Florida LLC ("Verizon") files these preliminary comments concerning the storm hardening plans filed by Tampa Electric Company ("TECO"), Progress Energy Florida, Inc. ("PEF") and Florida Power & Light Company ("FP&L").

Verizon has reviewed the storm hardening plans of TECO, PEF and FP&L, which are the three investor-owned utilities in its service territory. The plans provide a general description of the work each company has proposed, but lack the detail necessary to evaluate the costs to third-party attachers such as Verizon. Verizon cannot assess hardening projects without knowing in advance engineering detail such as what routes will be included. Verizon has met with TECO, PEF and FP&L to gain a better understanding of plan implementation and intends to continue working with them to obtain engineering detail before construction of each project. If Verizon determines that implementation of the storm hardening plans would impose undue costs, Verizon will make an appropriate filing with the Commission.

Respectfully submitted on May 30, 2007.

By: <u>s/ Dulaney L. O'Roark III</u> Dulaney L. O'Roark III General Counsel-Southeast Region Verizon Six Concourse Parkway, Suite 800 Atlanta, GA 30328

Attorney for Verizon Florida LLC

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing were sent via U.S. mail on

May 30, 2007 to:

Staff Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Bill Walker Florida Power & Light Company 215 S. Monroe Street, Suite 810 Tallahassee, FL 32301-1859

John T. Butler Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420

Paul Lewis, Jr. Progress Energy Florida, Inc. 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740

John T. Burnett Progress Energy Service Company, LLC P. O. Box 14042 St. Petersburg, FL 33733-4042

> Lee L. Willis/James D. Beasley Ausley Law Firm P. O. Box 391 Tallahassee, FL 32302

Paula K. Brown Tampa Electric Company P. O. Box 111 Tampa, FL 33601-0111

\_s/ Dulaney L. O'Roark III\_\_\_