BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 070299-EI

TESTIMONY OF ALAN G. MCDANIEL

August 24, 2007



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1		GULF POWER COMPANY
2		Before the Florida Public Service Commission Prepared Direct Testimony of
3		Alan G. McDaniel Docket No. 070299-El
4		In Support of Gulf Power Company's Storm Hardening Plan
		Date of Filing: August 24, 2007
5	•	
6	Q.	Please state your name, business address, and occupation.
7	Α.	My name is Alan McDaniel, and my business address is One Energy
8		Place, Pensacola, Florida 32520. I am the Project Services Manager of
9		Power Delivery for Gulf Power Company. I am responsible for joint use
10		and third-party attachments, skills development for engineering and
11		construction, and engineering and design of large distribution conversion
12		projects, along with the preparation and implementation of Gulf Power
13		Company's storm restoration plan.
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15	Q.	Please summarize your educational and professional background.
16	Α.	I graduated from the University of Florida with a Bachelor of Science
17		degree in Electrical Engineering in 1981 and from Colorado State
18		University with a Masters in Business Administration in 2006. Since
19		joining Gulf Power Company in 1980, I have held a number of positions
20		with increasing responsibility: co-operative education student, Associate
21		Engineer, Staff Engineer, Supervisor of Area Engineering, Distribution
22		Engineering Supervisor, Engineering and Construction Supervisor,
23		and Engineering and Construction Manager. My experience with Gulf
24		Power Company has included working in several areas of the Company
25		from Panama City to Pensacola in distribution operation, maintenance,

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and construction, and substation and transmission maintenance.

2 I have represented Gulf on distribution technical and strategic 3 committees within Southern Company dealing with a variety of issues 4 including work methods and materials, distribution engineering and 5 construction, substation maintenance, and mutual assistance. I have 6 participated in and led many storm restoration teams after major storms. 7 My first hurricane restoration experience was as a team leader after 8 Hurricane Elena in 1985. My most recent experience was as the 9 restoration area manager after Hurricanes Ivan, Dennis and Katrina in 10 2004 and 2005. I have participated in restoration work in the field for 12 11 named storms ranging from tropical storms to category 3 hurricanes.

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13 Q. What is the purpose of your testimony?

14 Α. I will address Sections 11.0 and 12.0 of Gulf Power Company's Storm 15 Hardening Plan (the "Plan") for 2007 – 2009 as amended on August 14, 16 2007. Section 11.0, impact to collocation of facilities, deals with pole 17 strength and load assessments and the new process concerning 18 notification by third-party attachers when they perform overlashing of 19 cables and Section 12.0 covers third-party attachers' estimates of costs 20 and benefits. I will discuss how each section addresses and supports the 21 requirements set forth in Florida Public Service Commission (FPSC) 22 Rules 25-6.0341 and 25-6.0342. My testimony addresses the Plan in the 23 context of third-party attachment standards and procedures.

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1	Q.	Does Gulf maintain written third-party attachment standards and
2		procedures which address safety, reliability, pole loading capacity, and
3		engineering standards?
4	Α.	Yes. Gulf has maintained such written third-party attachment standards
5		and procedures for many years.
6		
7	Q.	Do Gulf's third-party attachment standards and procedures meet or
8		exceed the 2007 National Electrical Safety Code ("NESC")?
9	Α.	Yes.
10		
11	Q.	Does Gulf's Plan include proposed changes to third-party attachment
12		standards and procedures?
13	Α.	Yes. Gulf's Plan proposes two changes: (1) the requirement of a pole
14		strength and loading analysis prior to any new burden being placed on a
15		Gulf Power pole, and (2) the requirement of advance notice of overlashing
16		in order to better implement the pole strength and loading program. The
17		other parts of Gulf's attachment standards and procedures are neither
18		new nor specifically related to storm hardening.
19		
20	Q.	Please explain the term "overlashing."
21	Α.	Overlashing is when a new cable, fiber or other line is lashed or attached
22		to the existing messenger wire or cable.
23		
24	Q.	What is the purpose of the pole strength and loading analysis?
25	Α.	Gulf's Ten-Part Storm Preparedness Plan, as approved in FPSC Order

1 No. PSC-06-0781-PAA-EI, included a pole strength and loading analysis 2 program for a sampling of Gulf's poles. This approved pole strength and 3 loading analysis program was also included in Section 2.2 of Gulf's Plan. 4 The pole strength and loading analysis Gulf proposes for new 5 attachments and overlashing is an extension of the policy embedded in 6 the Ten-Part Storm Preparedness Plan. This analysis for new 7 attachments and overlashing will provide Gulf with data, on a going 8 forward basis, on whether and to what extent third-party attachments 9 impact the loading of any particular pole or pole line. If the pole strength 10 and loading analysis reveals that the pole or pole line is not strong enough 11 to support the proposed attachment (or overlashing, as the case may be) at Grade B construction standard, Gulf will require "make ready" prior to 12 13 the new burden being added to the pole or pole line. 14

15 Q. What is the definition of "make ready" in this context?

A. Make ready refers to any work that has to be done on the pole or pole line
to accommodate the new attachment (or overlashing). This can include
rearrangement of existing facilities, additional guying, or replacing the
existing poles with taller or stronger poles, and adding additional poles to
the line.

- 21
- Q. What is the purpose of the new requirement that third-party attachersprovide advance notice of overlashing?
- A. In the past, Gulf has not specifically required third parties to provide
 advance notice of overlashing. The new overlashing notification

requirement allows Gulf to perform a pole strength and loading analysis
 prior to a new burden being placed on the pole or pole line. This
 notification requirement is a common practice of other investor-owned
 electric utilities in the state of Florida.

- 6 Q. Why did Gulf not require advance notice of overlashing from
 7 third-party attachers before now?
- A. Overlashing is a relatively new process in Gulf's service area. As the
 average number of third-party attachments per pole has continued to
- 10 increase and the potential for greater load on each pole has become more
- 11 prevalent, Gulf is taking a proactive approach to managing its
- 12 infrastructure. It is reasonable to expect notification of any additional
- 13 burden being placed on our facilities by third-party attachers.
- 14

15 Q. How many of Gulf's poles are currently impacted by third-party attachers? The majority of the poles impacted by third-party attachers are distribution 16 Α. poles. As of December 31, 2006, Gulf had approximately 244,000 17 distribution poles in service. Based on 2006 data, approximately 151,000 18 19 of those poles had one or more third-party attachments. This means that approximately 62% of Gulf's distribution poles are impacted by third-party 20 21 attachments. Many of these poles have multiple third-party

- 22 attachments.
- 23
- 24
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Q. How will the deployment of the pole strength and loading analysis
 program work?

3 Α. The pole strength and loading analysis program is targeted to answer one 4 question: can the pole or pole line handle the new burden under Grade B 5 construction specifications? When Gulf receives a new permit application 6 or an overlashing notification, a pole strength and loading analysis will be 7 performed for all poles impacted by the proposed attachment/overlashing. 8 If the proposed attachment/overlashing would cause failure by Grade B 9 construction standards, make ready options will be assessed. Gulf will 10 not allow an attachment/overlashing to be made until the impacted poles 11 are sufficiently strong enough to support the additional load at Grade B 12 construction.

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Q. Did Gulf seek input from third-party attachers with respect to its Plan and
attempt in good faith to accommodate their concerns?

Α. 16 Yes. Gulf sought input prior to the May 2007 submission of the initial Plan 17 and has continued to have dialogue with third-party attachers since the 18 FPSC opened the current docket. The dialogue prior to the May 2007 19 submission resulted in more specificity with respect to Gulf's overlashing 20 notification process. The dialogue since the original submission led to the 21 removal of certain third-party attachment specifications from the Plan. 22 Gulf has and will continue to share information with the third-party 23 attachers regarding the potential cost impact of the Plan.

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Q. In the Plan, does Gulf provide a detailed description of the extent to which
 the electric infrastructure improvements involve joint-use facilities on
 which third-party attachments exist?

A. Yes. Gulf Power has and will continue to work with all third-party
attachers to provide sufficient details of proposed electric infrastructure
improvements to determine potential impacts to joint-use facilities.

7 Detailed location maps of potentially-impacted joint-use facilities
8 have been and will continue to be provided to all interested third-party
9 attachers. The locations identified on the maps indicate where a third10 party attacher has one or more attachments on a pole.

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Q. In the Plan, does the Company provide a reasonable estimate of the costs
and benefits to third-party attachers affected by the electric infrastructure
improvements, including the effect on reducing storm restoration costs
and customer outages realized by the third-party attachers?

- A. Yes. In Section 12.0 of the Plan, Gulf identifies costs and benefits to
 third-party attachers based on information supplied to Gulf by the third party attachers. Since filing the Plan, Gulf has furnished additional,
 detailed location maps of the infrastructure improvement projects to allow
- 20 third-party attachers to better evaluate their cost and benefits.
- 21

Q. Do Gulf's proposed changes to the third-party attachment standards and
procedures meet the objectives of enhancing reliability and reducing
restoration costs and outage times in a prudent, practical, and costeffective manner to the affected parties?

1	Α.	Yes. Gulf's Plan, which includes the Ten-Part Storm Preparedness
2		Plan initiatives that were approved by the Commission in Order Nos. PSC-
3		06-0781-PAA-EI and PSC-06-0947-PAA-EI, can reasonably be expected
4		to enhance the reliability and reduce restoration cost and outage times in
5		a cost-effective manner. By performing the joint-use pole attachment
6		audits and pole strength and loading analysis where appropriate, Gulf's
7		Plan is prudent, practical, and cost-effective.
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9	Q.	Does this conclude your direct testimony?
10	Α.	Yes.
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AFFIDAVIT

STATE OF FLORIDA

Docket No. 070299-EI

Before me the undersigned authority, personally appeared Alan G. McDaniel, who being first duly sworn, deposes, and says that he is the Project Services Manager of Power Delivery for Gulf Power Company, a Florida corporation, that the foregoing is true and correct to the best of his knowledge, information, and belief. He is personally known to me.

4 M. Dame

Alan G. McDaniel Project Services Manager

Sworn to and subscribed before me this <u>23</u>nd day of <u>August</u> 2007.

Brame hue Halsiger

Notary Public, State of Florida at Large

Commission No. DD 40/2/0

My Commission Expires Opril 10, 2009

