From:

Woods, Vickie [vf1979@att.com]

Sent:

Friday, November 02, 2007 11:58 AM

To:

Filings@psc.state.fl.us

Subject:

070297/070298/070299/070301-TP AT&T Florida's and TCG's Joint Prehearing Statement

Importance: High

Attachments: Storm_Ha.pdf

Vickie Woods

Legal Secretary to E. Earl Edenfield, Jr., Tracy W. Hatch, Manuel A. Gurdian and Jennifer S. Kay BellSouth Telecommunications, Inc. d/b/a AT&T Florida 150 South Monroe Street Suite 400 Tallahassee, Florida 32301 (305) 347-5560 vf1979@att.com

Docket No. 070297-EI: Review of 2007 Electric Infrastructure Storm Hardening Plan B.

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. 070299-EI: Review of 2007 Electric Infrastructure Storm Hardening Plan

filed pursuant to Rule 25-6.0342, FAC, submitted by Gulf Power Company

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

- BellSouth Telecommunications, Inc. C. on behalf of Jennifer S. Kay
- 6 pages total (includes letter, certificate of service and pleading) D.
- BellSouth Telecommunications, Inc. d/b/a AT&T Florida's and TCG's Joint Post-Hearing Statement Ε,

pdf

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November 2, 2007

Ms. 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. 070299-El: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by **Gulf Power Company**

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 is a Joint Post-Hearing Statement of BellSouth Telecommunications, Inc. d/b/a AT&T Florida and TCG, which we ask that you file in the captioned dockets.

Copies have been served to the parties shown on the attached Certificate of Service.

cc: All Parties of Record Jerry D. Hendrix E. Earl Edenfield, Jr. James Meza III

DOCUMENT NUMBER-DATE

09993 NOV-25

CERTIFICATE OF SERVICE Docket Nos. 070297-EI, 070298-EI, 070299-EI and 070301-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via

Electronic Mail, (**) Facsimile and First Class U. S. Mail this 2nd day of November,

2007 to the following:

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Jennifer S. Kay

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Review of 2007 Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Tampa Electric Company.

Electric DOCKET NO. 070297-EI

Review of re: 2007 Electric In Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Progress Energy Florida, Inc.

DOCKET NO. 070298-EI

Review of 2007 In re: Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Gulf Power Company.

Electric DOCKET NO. 070299-EI

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Florida Power & Light Filed: November 2, 2007 Company.

DOCKET NO. 070301-EI

JOINT POST-HEARING STATEMENT OF AT&T FLORIDA AND TCG

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida") and TCG South Florida ("TCG"), in compliance with the Order Consolidating Dockets and Establishing Procedure (Order No. PSC-07-0573-PCO-EI) issued on July 10, 2007 and the Prehearing Order (Order No. PSC-07-0796-PHO-EI) issued on September 28, 2007, hereby submit a Joint Post-hearing Statement for Dockets Nos. 070297-EI, 070298-EI, 070299-EI and 070301-EI.

I. Statement of Basic Position

Based on AT&T Florida and TCG's review of the project details included in the IOUs' respective Storm Hardening Plans filed with the Florida Pubic Service

DOCUMEN' NUMBER-DATE

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FPSC-COMMISSION CLERK

Commission (the "Commission") on May 7, 2007 (the "Plans"), and with the stipulation regarding the Process to Engage Third-Party Attachers approved by the Commission at the hearing on October 2, 2007, AT&T Florida and TCG have no objections to the IOUs' respective Plans at this time.

II. AT&T Florida and TCG's Positions on the Issues

Issues 1 through 52:

AT&T and TCG Position: * No Position *

In light of the Commission's approval of the Process to Engage Third-Party Attachers, AT&T Florida takes no position on Issues 1 through 52 at this time. AT&T Florida and TCG reserve the right to raise objections regarding an IOU's Plan as AT&T Florida and TCG receive more detailed information about specific projects, as contemplated by Rule 25-06342(7) and the Process to Engage Third-Party Attachers.

Respectfully submitted this 2nd day of November, 2007.

BellSouth Telecommunications, Inc. d/b/a AT&T Florida

and TCG South Florida

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