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Sent: Friday, November 02, 2007 12:26 PM
To: Filings@psc.state.fl.us
Subject: Docket No. 070299
Attachments: PDF_Scan.pdf; Updated brief for 070299 (TL139713).DOC

Attached for filing in the referenced Docket, are a PDF and a Word version of the Post Hearing Statement of the Florida Cable Telecommunications Association, Inc. If you have any questions whatsoever, please do not hesitate to contact me.

Sincerely,
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B. Docket No. 070299 - Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Gulf Power Company.

C. On behalf of: Florida Cable Telecommunications Association, Inc.

D. Number of pages: 8

E. Description: PDF and Word versions of FCTA's Post Hearing Statement



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DOCUMENT NUMBER-DATE

09994 NOV-26

11/2/2007

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, Florida Administrative Code, submitted by Gulf Power Company.

Docket No. 070299-EI

Filed: November 2, 2007

POST HEARING STATEMENT OF THE FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC.

Pursuant to the Order Consolidating Dockets and Establishing Procedure, Order No. PSC-07-0573-PCO-EI, issued July 10, 2007, and in accordance with the Prehearing Order, Order No. PSC-07-0796-PHO-EI, issued September 28, 2007, the Florida Cable Telecommunications Association, Inc. (FCTA) hereby submits its Post Hearing Statement. In view of the approved Process to Engage Third Party Attachers and the Stipulation reached between FCTA and Gulf Power, FCTA offers the following abbreviated statement on the issues:

A. Basic Position

* Gulf's Storm Hardening Plan should be approved by the Commission. Furthermore, consistent with Gulf's position on Issue 38, as clarified, the Attachment Standards and Procedures included with the Plan should not be *approved* by the Commission.*

B. Issues

27. Does the Company's Plan address the extent to which, at a minimum, the Plan complies with the National Electric Safety Code (ANSI C-2) [NESC] that is applicable to subsection 25-6.0345(2), F.A.C. [Rule 25-6.0342(3)(a)]

FCTA: * Yes. Gulf's Storm Hardening Plan complies with the National Electric Safety Code.*

(Stipulated: As set forth in Order No. PSC-07-0796-PHO-EI)

28. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)1]

FCTA: * The Plan does not adopt EWL for new distribution facility construction and thus, FCTA takes no position on this issue. *

29. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]

FCTA: * The Plan does not adopt EWL criteria for major planned work and thus, FCTA takes no position on this issue. *

30. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational consideration? [Rule 25-6.0342(3)(b)3]

FCTA: * The Plan only adopts EWL for limited critical infrastructure pole projects and thus, FCTA takes no position on this issue. *

31. Does the Company's Plan address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(b)(3)(c)]

FCTA: * Yes. Gulf has developed overhead and underground distribution storm hardening specifications to mitigate damage due to flooding and storm surges. These specifications are shown in Appendices 5 and 6 of Gulf's Storm Hardening Plan. In addition, Gulf is currently working on several distribution pilot projects in potential storm surge areas to test the effectiveness of mitigation techniques. Current pilot projects include the installation of below-grade gear, along with heavy lids and anchoring systems on flush-mounted switch enclosures. Gulf will continue to utilize stainless steel equipment in all coastal areas as it's done for many years. * (Stipulated: As set forth in Order No. PSC-07-0796-PHO-EI)

32. Does the Company's Plan address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance pursuant to Rule 25-6.0341, F.A.C.? [Rule 25-6.0342(3)(d)]

FCTA: * Yes. Gulf Power has always recognized that accessibility to distribution facilities is essential to safe and efficient maintenance and storm restoration. Gulf continues to promote placement of facilities adjacent to public roads; to utilize easements, public streets, roads and highways; obtain easements for underground facilities; and to use right-of-ways for conversions of overhead to underground.* (Stipulated: As set forth in Order No. PSC-07-0796-PHO-EI)

33. Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]

FCTA: * In view of the approved Process to Engage Third Party Attachers, FCTA has no objection pertinent to this Issue. *

34. Does the Company's Plan provide a detailed description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3 are to be made? [Rule 25-6.0342(4)(b)]

FCTA: * The Company's Plan provides a description of the communities and areas within the utility's service area where the electric infrastructure improvements, as required. Moreover, the approved Process to Engage Third Party Attachers alleviates FCTA's concerns regarding the level of detail currently missing from Gulf's Plan pertinent to this issue. *

35. Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]

FCTA: * In view of the approved Process to Engage Third Party Attachers, FCTA has no objection pertinent to this Issue. *

36. Does the Company's Plan provide an estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]

FCTA: * The approved Process to Engage Third Party Attachers alleviates FCTA's concerns regarding the level of detail currently missing from Gulf's Plan pertinent to this issue.*

37. Does the Company's Plan provide an estimate of the costs and benefits, obtained pursuant to subsection (6) below, 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? [Rule 25-6.0342(4)(e)]

FCTA: * In view of the approved Process to Engage Third Party Attachers, FCTA has no objection pertinent to this Issue. *

38. Does the Company's Plan include written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSI C-2) that is applicable pursuant to Rule 25-6.034, F.A.C.? [Rule 25-6.0342(5)]

FCTA: * In view of Gulf's clarified position that it is not seeking the Commission's approval of its attachment standards and procedures beyond a finding that they meet or exceed the NESC requirements, FCTA has withdrawn its objections on this Issue and supports Gulf's amended position.*


39. Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties. [Rule 25-6.0342(1) and (2)]

FCTA: * In recognition of the fact that the Process to Engage Third Party Attachers resolves FCTA's concerns regarding the level of detail in the Plan, as well as Gulf's clarified position on Issue 38 and other changes resolved through stipulation, FCTA has no objection to the approval of Gulf's Plan.*

C. Compliance With Prehearing Order

FCTA believes that this Post Hearing Statement fully complies with the requirements of the Prehearing Order, Order No. PSC-07-0796-PHO-EI.

RESPECTFULLY SUBMITTED this 2nd day of November, 2007.

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Post Hearing Statement of the Florida Cable Telecommunications Association, Inc. in Docket No. 070299-EI was served via Electronic Mail and First Class US Mail to the persons listed below on this 2nd day of November, 2007:

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