Commissioners: Art Graham, Chairman Lisa Polak Edgar Ronald A. Brisé Eduardo E. Balbis Julie I. Brown

## STATE OF FLORIDA

OFFICE OF THE GENERAL COUNSEL S. CURTIS KISER GENERAL COUNSEL (850) 413-6199

## Hublic Service Commission

May 21, 2014

Scott A. Goorland, Esquire Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420

## **Re: Docket No. 140082-EI - Petition for change to requirements of Order No. PSC-06-0144-PAA-EI regarding pole inspection and load assessment, by Florida Power & Light Company.**

Dear Mr. Goorland:

By this letter, Commission staff requests that Florida Power & Light Company (FPL) provide responses to the following data requests:

- 1. Paragraph 5 on Page 2 indicates that this docket would not involve reversal or modification of the Commission's decision.
  - a. If the Commission approves FPL's petition for change to pole inspection and load assessment requirements, is that not a reversal or modification to the applicable Orders? Please explain your response.
- 2. Paragraph 12 on Page 5 indicates that the Joint Petitioners agreed to modify their request to continue sound and bore inspections for all CCA poles that are under 16 years, but to eliminate the requirement to perform full excavation on these poles, and instead perform excavation sampling on these poles.
  - a. If FPL is granted the exemption, of eliminating full excavation on poles that are less than 28 years, to Order No. PSC-08-0615-PAA-EI, which CCA poles, if any, would FPL continue to inspect via sound and bore? Please explain your response.
  - b. Would excavation sampling on poles less than 28 years be an option for FPL? If not, why not.
  - c. If excavation sampling is a viable option, how many poles should be sampled and what would the cost be?

- Please provide an inventory of FPL's CCA poles. In your response, please include the number of poles by region, county, and age: 0-5 Years, 6-10 Years, 11-15 Years, 16-20 Years, 21-25 Years, 26-30 Years, 31-35 Years, 36-40 Years, 41-45 Years, 46-50 Years, 51-55 Years, 56-60 Years, and Unknown.
- 4. In FPL's 2014 Status/Update report on Storm Hardening/Preparedness and Distribution Reliability, FPL reported 12.8 percent of wooden poles failed.
  - a. How many of the 12.8 percent are CCA poles?
  - b. Please describe and explain what caused the failure of the CCA poles.
- 5. Paragraph 17 on Page 7 indicates that the vast majority of FPL's poles were not close to their 100 percent loading and the risk associated with not conducting load assessments during FPL's second eight-year cycle on poles which were previously determined to be loaded at below 80 percent of full loading is extremely low.
  - a. Please explain in detail the basis for your conclusion that the risk is extremely low.
  - b. Please provide the data which indicates that the vast majority of FPL's poles were not close to their 100 percent loading.
  - c. Please explain the process and procedure that would be put in place, if any, to account for poles that were deemed to be loaded below the 80 percent threshold at the beginning of the eight-year cycle but may be modified, during that cycle i.e., attachment or equipment is added? Would FPL add these poles to the inspection cycle?
  - d. Please explain in detail why FPL believes 80 percent is the appropriate threshold.

		Poles Rejected				Poles Decaying and Weakened				Total Poles Rejected or Decayed	
		Interior Outer				Interior Outer				Deet	iyea
	Total	Decay	Decay			Decay (More	Decay				
	Number	(More than 1"	(1" or less			than 1"	(1" or				
	of Poles	from	from		% of	from	less from		% of	Total	% of
Year		surface)		Other	% of Total	surface)		Othor	% of Total	Number	% of Total
	Inspected	surface)	surface)	Other	Total	surface)	surface)	Other	Total	Number	Total
0-5 Years											
6-10											
Years											
11-15											
Years											
16-20											
Years											
21-25											
Years											
26-30											
Years											
31-35											
Years											
36-40											
Years											
41-45											
Years											
46-50											
Years											
51-55											
Years											
56-60											
Years											
Unknown											
Totals											

6. Please refer to Exhibit A of FPL's Petition. Please provide the data in Exhibit A in the following format:

- 7. Please refer to Exhibit B of FPL's Petition.
  - a. Please explain in detail how FPL developed the sample that was used to generate Exhibit B.
  - b. In reviewing Exhibit B, staff noticed there were several feeders that were tested more than once. Please explain why FPL tested these-feeders more than once.
  - c. Please identify the feeders on Exhibit B that would be included in the eight year cycle for load assessment. Also, please identify the feeders that would be included in the eight year cycle for load assessment that are not included in Exhibit B.

Please file the original and five copies of the requested information by Wednesday, June 3, 2014, with Carlotta Stauffer, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6226 if you have any questions.

Sincerely, Keino Young Chief Trial Counsel

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cc: Office of Commission Clerk