Peace River Electric Cooperative, Inc.
PO Box 1310 . 210 Metheny Road . Wauchula, FL 33873 . (863) 773-4116 . Fax (863) 773-3737 . www.preco.coop
A Touchstone Energy® Cooperative

December 15th, 2017

Florida Public Service Commission
Attn: Wesley Taylor
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850)-413-6175

RE: Docket No. 20170215-EU – Data Request

Mr. Taylor,

Please find the enclosed 2017 response to Docket No. 20170215 for Peace River Electric Cooperative, Inc. If you have any questions you may contact me directly.

Sincerely,

Paul Roberts

Digitally signed by Paul Roberts
DN: cn=Paul Roberts, o=Peace River Electric Cooperative, Inc., ou=VP of Engineering, email=paul.roberts@preco.coop, c=US
Date: 2017.12.15 10:50:57 -05'00'

Paul Roberts, P.E.
V.P. of Engineering
P.O. Box 1310
Wauchula, FL 33873
(863)-773-4650
Fax: (863)-767-4662
paul.roberts@preco.coop

Enc: PSC Hurricane Request PRECO Submittal-12-13-17

COMMISSIONERS:
JULIE I. BROWN, CHAIRMAN
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STATE OF FLORIDA

OFFICE OF THE GENERAL COUNSEL
KEITH C. HETRICK
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

November 14, 2017

STAFF'S FIRST DATA REQUEST
via email

To:

Duke Energy Florida, LLC (Matthew.Bernier@duke-energy.com, dianne.triplett@duke-energy.com)
Florida Power & Light Company (ken.hoffman@fpl.com)
Gulf Power Company (jastone@southernco.com, rab@beggslane.com)
Tampa Electric Company (jbeasley@ausley.com)
Municipal Group (AZubaly@publicpower.com)
Lee County (dennie.hamilton@lcec.net)
Cooperative Group (mhershel@feca.com)

Re: Docket No. 20170215-EU - Review of electric utility hurricane preparedness and restoration actions.

To Whom It May Concern:

By this letter, the Commission staff requests that each utility provide responses to the following data requests.

Staging for Utility Personnel and Mutual Aid

1. Please describe the pre-storm coordination process for Hurricanes Hermine, Matthew, Irma, Maria, and Nate. The description should include:
   a. Dates and topics of internal meetings held after each storm was named.
   For the storms Hermine, Maria, and Nate, no formal meetings were held within PRECO as these 3 storms did not pose an imminent threat to our service territory in a 5-day cone. Also no data will be provided throughout the remainder of this document for these storms.

   For Matthew, PRECO staff tracked the storm's progress continually and met after each NHC update during our normal business hours. Topics discussed included predicted asset impact, material procurement and allocation, contract personnel needs and mutual aid requests, as well as lodging and meal procurement. Utility Personnel Meeting Dates were October 3rd through October 7th, 2016. Since there was minimal impact to our system, this storm may not be addressed fully on every question raised throughout the remainder of this response.

For Irma, PRECO staff tracked the storm progress continually and met after each NHC update during our normal course of business and after hours as needed. Topics discussed included predicted asset impact, material procurement and allocation, employee well being, customer commuincation contract personnel needs and mutual aid requests, as well as lodging and meal procurement. Following impact, meetings consisted of outage updates, issue resolution, mutual aid and utility personnel performance and release. Utility Personnel Meeting Dates were September 6th through September 18th, 2016.

b. Dates and topics of external communication pertaining to mutual aid held after each storm was named.
   i. Topics for these meetings consisted of personnel needs for mutual aid, state or local government needs, fuel or other resource needs, as well as storm progress and staging needs.
   ii. For Matthew, Mutual Aid meetings were held between Coop Managers and FECA on October 4th & 5th, 2016. Conference calls between FECA and other Statewides to discuss mutual aid were held on October 4th through October 8th, 2016.
   iii. For Irma, Mutual Aid Daily conference calls were held beginning September 6th through September 15th, 2017. In addition, FECA had daily conference calls with Statewides from around the country to discuss availability of crews and mutual aid during the same time frame.

c. Date mutual aid was requested and nature of request.
   i. For Matthew, PRECO requested aid on October 5th, 2016 for five (5) 4-5 man line crews and four (4) 2-man service crews. We staged these crews on October 6th and released them on October 7th. No work was done by these crews on the PRECO system, as damage was repaired with internal crews.
   ii. For Irma, PRECO requested for aid on September 7th, 2017 eighteen (18) 2-man service crews. They arrived on September 15th and we released them on September 18th. All major line work up to this point was repaired by internal crews or contractors that were staged on September 10th through 11th to begin work on September 12th.

2. Please provide a detailed description of the utility's allocation of storm duties for all personnel. This should include a description of each function and the number of utility personnel assigned. PRECO ERP (Emergency Response Plan) details each level of responsibility and duties assigned within the Cooperative when activated. This is a large amount of information and is readily available for review by Commission staff at our office.

3. When did the costs for Hurricanes Hermine, Matthew, Irma, Maria, and Nate begin to accrue for receiving mutual aid? For Matthew, these costs began to accrue on October 5th, 2016. For Irma, these costs began to accrue on September 10th, 2017.

Damage Assessment Process

4. Please provide a detailed overview of the initial damage assessment process for Hurricanes Hermine, Matthew, Irma, Maria, and Nate, including the number of utility employees or contractors involved, their duties, and how initial damage assessment is disseminated within the utility to assist in restoration activities. Additionally, please provide photographs or other visual media that memorializes storm damage, which was documented during the initial damage assessment process.

When it is safe to do so, two-man assessment teams are deployed to begin riding out major transmission feeds, substation sites, and distribution feeder lines by line sections. Crews have a certified lineman within each crew to be able to find and fix any minor damage or clear any downed lines from the road. These crews may be part of local county "first in" teams and are also directed to remove any tap lines needing repair or may be unable to be easily seen from the road or main line feeder. Once a section has been patrolled, information is documented and provided in written and image form to the Command Center. The Command Center begins to use this information to formulate a repair strategy depending on the severity of damage, location, access, resource requirements, customer count, and power source availability. For Matthew, PRECO incurred minimal damage and was able to repair with two (2) two-man service crews. No pictures or written assessment was needed or taken for this storm. For Irma, large amounts of data in the form of pictures and data were taken for records and assessment and are available for the Commission Staff at our office for review. Attached in "Exhibit A" is an example.

A detailed list of utility personnel and duties are provided and available in the PRECO ERP which is available for review by Commission staff at the PRECO main office. A total of 117 PRECO internal employees were available and assisted with the restoration efforts for Hurricane Matthew and Irma.

5. Please provide a description of how damage assessment data is updated and communicated internally. Damage assessments are communicated to the Command Center in a few ways depending on the locations and severity of damage. If damage impact to the PRECO system is minimal as was the case in the aftermath of Hurricane Matthew, PRECO assessment crews simply communicate those damage concerns for each assigned outage into our centralized System Control dispatch and the needed material or additional crew support is routed to the area of impact. If damage is large and widespread as was the case with Irma, a slower, more detailed, broad stoke assessment is performed on each effected line section once it is safe to do so. Assessments are communicated in written form and provided with photographs in order to paint a clear picture of the amount and nature of damage. Those assessments are submitted either once a section is complete or at the end of a defined work shift. Restoration begins depending on the amount of damage to a particular line section or if additional damage has been discovered. Work progress and safety clearences are communicated throughout the day on a continual basis by the Command Center and through System Control Dispatch. Assesments and line restoration may occour independently or conjunctively depending on the severity of damage.

Restoration Workload

Please provide a detailed description of how the utility determines when and where to start restoration efforts. When a major storm or disaster causes widespread outages we restore service safely to the greatest number of members in the shortest time possible. Priority is determined as:

1. High Voltage Transmission lines
2. Distribution Substations
3. Main Distribution Feeder Lines
4. Tap Lines
5. Individual homes

6. For Hurricanes Hermine, Matthew, Irma, Maria, and Nate, please complete the following table on workload priority:

Personnel Responsible for Restoration Workload Assignments		
Title	Years of experience	Number of crews managed
VP of Operations	31 years	62
VP of Engineering	12 years	

7. Please provide a description of how restoration workload adjusts based on work completed and updates to damage assessments. The positions listed above man the Command Center and, in addition to these positions, PRECO has three (3) service area district supervisors and work is divided based upon assessments and open outages in each area. Each service district operations supervisor is responsible for assigned crews. In Irma, damage was in all three (3) PRECO districts and outside restoration crews were assigned according to damage assessments and until remaining workload could be completed with internal personnel in those districts. Daily conference calls were held between the Command Center and those districts to evaluate restoration crew needs and progress. Restoration crews could be rerouted and reassigned to other district areas still in need of repair based on open damage assessments or any new assessments. Assessments were prioritized according to the list above on Question #5.

8. If applicable, please describe how mutual aid was determined to be no longer needed following Hurricanes Hermine, Matthew, Irma, Maria, and Nate. In Matthew, support requests were based upon predicted impact and PRECO only suffered minimal damage and few outages as a result of this storm. Crews were released once the storm had passed and was no longer a threat to PRECO service area. In Irma, mutual aid support was requested and received. However upon arrival, work load was evaluated each day of restoration depending on the progress of the previous day and the amount and nature of work still left to complete. Mutual aid crews were only released after all districts could handle remaining work with internal crews and total outages were approaching 1% of the total system served accounts.

Staffing Considerations

9. Regarding Hurricanes Hermine, Matthew, Irma, Maria, and Nate, please respond to the following, please provide the following:
   a. Days of lodging provided for Utility personnel (Person-Days) 910
   b. Days of lodging provided for mutual aid partners (Person-Days) 248
   c. Number of meals provided for Utility personnel 5,481 (3 per day per person)
   d. Number of meals provided for mutual aid partners 705 (3 per day per person)
   e. Number of Utility personnel injuries 0
   f. Number of mutual aid partner injuries 0
   g. Number of Utility personnel fatalities 0
   h. Number of mutual aid partner fatalities 0

   Please note any delays in restoration associated with items e-h above. No delays in restoration were a result of any of the above items.

10. Please provide a detailed description of when your Utility was considered fully restored from each named storm event. For Matthew, PRECO system was deemed fully restored on September 7th, 2016. For Irma, PRECO system was deemed fully restored on September 19th, 2017.

Customer Communication

11. Regarding Hurricanes Hermine, Matthew, Irma, Maria, and Nate, please respond to the following for each county in the Utility's service territory affected by the storms.
   a. Total number of customer accounts
   b. Peak number of outages

Hurricane Matthew	Customer accounts	Outages
Brevard	55	42
Desoto	967	197
Hardee	6789	50
Highlands	377	0
Hillsboro	1144	0
Indian River	212	69
Manatee	25760	215
Osceola	903	603
Polk	5212	54
Sarasota	36	0
	41455	1230

Hurricane Irma	Customer accounts	Outages
Brevard	61	61
Desoto	973	973
Hardee	6853	6853
Highlands	380	380
Hillsboro	1147	1147
Indian River	215	215
Manatee	25580	25580
Osceola	915	915
Polk	5240	5240
Sarasota	36	36
	41400	41400

12. Please provide how call center customer service representatives were utilized before, during and after Hurricanes Hermine, Matthew, Irma, Maria, and Nate.
Due to the predicted widespread impact of Hurricane Irma, the customer service representatives contacted members designated as Medical Essential to make alternate arrangements for power and/or shelter prior to the storm making landfall.

After Hurricane Irma made landfall, the customer service representatives answered customer calls related to the outage.

13. Please provide the number of customer service representatives the Utility had during Hurricanes Hermine, Matthew, Irma, Maria, and Nate. 8 (eight)
    a. Were there additional personal deployed or 3rd party entities utilized to help address customer contacts during each named storm event? We utilized personnel from the CIS billing department to answer phone calls. If so, how many? 5 (five)

14. Please provide the number of customer contacts received by the customer call center(s) during Hurricanes Hermine, Matthew, Irma, Maria, and Nate.
    We received 4,176 contacts during Hurricane Irma

15. Please provide all methods (call centers, email, Utility website, etc.) utilized to submit and collect customer contacts before, during, and after Hurricanes Hermine, Matthew, Irma, Maria, and Nate. Call center, email, IVR, SmartHub (website) were all utilized during Irma.

16. Please describe the step by step process(es) by which customer contacts are addressed before, during, and after a named storm event. If different during each timeframe, please describe the step by step process during each separately.

a. Did the Utility identify any delays in restoration as a result of addressing customer contacts related to Hurricanes Hermine, Matthew, Irma, Maria, and Nate? If so, please provide detail. There were no delays in restoration due to customer contacts. When a major storm or disaster causes widespread outages we restore service safely to the greatest number of members in the shortest time possible. Priority is determined as:

1. High Voltage Transmission lines
2. Distribution Substations
3. Main Distribution Lines
4. Tap Lines
5. Individual homes

We communicate to customers that impacts to their specific location, can be a result of many different combinations of damage scenario's up line from their particular residence.

17. Please provide whether or not customer contacts are categorized (by concern, complaint, information request, etc.) If so, how are they categorized? If not, why not?

Members reporting hazards and other concerns are documented and the information is forwarded to System Control. A hazard or maintenance service order is created and the details are included in the service order.

18. Please provide a detailed description of how customer service representatives are informed of restoration progress.
    a. Is there a script provided to each customer service representative to relay restoration progress to customers? If so, what is the process by which the script is created?

Updates were provided to customer service representatives throughout the day. The customer service representatives had access to the internal outage viewer and were able to view areas where crews were working.

Scripts were provided to the customer service representatives to address common questions from the members. The VP of Member Services and Communication department met daily to develop the scripts.

19. Please describe the process the Utility uses to notify customers of approximate restoration times. The response should include at a minimum:
    a. How restoration time estimates were determined.
    b. How customers are notified.
    c. How restoration time estimates are updated.
    d. How restoration time estimates are disseminated internally, to the county and state Emergency Operations Centers, and to the public.

We do not provide restoration times to the members. If after reporting their outage the member was given an option for a call back once their service was restored.

Material Considerations

20. Regarding Hurricanes Hermine, Matthew, Irma, Maria, and Nate, please provide a description of how vehicle fuel was procured for Utility personnel and mutual aid partners. As part of the response, please answer the following:
    a. Whether or not the Utility has fuel stored for these types of events PRECO has the following fuel storage available.
        i. 5000 gal. gas 1000 gal. diesel at Central district
        ii. 1000 gal. gas 2000 gal. diesel at Western district
        iii. 500 gal. gas 1000 gal. diesel at Eastern district.

    b. Whether or not fuel shortage was an issue during these events. Fuel shortage was not an issue for PRECO during either event, however was a threat to our vendors at times.
    c. Whether or not there were any delays due to fuel shortage. PRECO was able to leverage fuel resources at neighboring Coops for incoming out of state resources so there were no delays.
    d. Whether or not there were enough vehicles available during these events/any issues mobilizing crews. PRECO had no vehicle availability issues or issues mobilizing crews.

21. Please detail any complications or delays such as shortage or delayed delivery of materials for Hurricanes Hermine, Matthew, Irma, Maria, and Nate. PRECO had no material availability issues. There was a threat of a fuel shortage that could have impacted this.

Restoration Process

Please provide a summary timeline of the utility's restoration process for each hurricane: Hermine, Matthew, Irma, Maria, and Nate. The timeline should include, but not limited to, staging, stand-down, deployment, re-deployment, allocation, mutual aid, release of mutual aid, and date last outage was restored.

For Hurricane Matthew:
On October 3rd, 2016 staff activated PRECO's Emergency Response Plan (ERP) Phase 1 Advanced Preparation. This would apply to any storm in PRECO territory that falls in a 5-day cone (Ref. ERP).

On October 5th, 2016 PRECO activated the 3-day plan of the ERP (Ref. ERP). We called for additional resources including 34 line personnel out of Alabama statewide (Mutual Aid), and staged these crews in the Tallahassee area by Friday October 7th, 2016. PRECO also called for 44 additional Right-of-Way contract crews from Georgia that were staged at a local facility in Polk County.

On October 7th, 2016 all crews were released and re-deployed to other Cooperatives in the state of Florida. PRECO had minimal outages during Matthew and all accounts were restored within the same day of landfall.

For Hurricane Irma:

On September 5th, 2017 staff activated PRECO's Emergency Response Plan (ERP) Phase 1, this encompasses all PRECO territory that falls in a 5-day cone (Ref. ERP).

On September 7th, 2017 PRECO staff activated the 3-day Cone (Ref. ERP). During this time arrangements were being made for additional Resources, this included Contractors, Mutual Aid, and Right-of -Way crews. Mutual Aid partners in the southeast region were hesitant to commit crews until later in the week of September 11th due to the storm track, potential impact and forecasted intensity. Mutual aid crews from outside the southeast were requested but could not arrive until later in the week due to drive time. External Utility contract crews consisting of 45 line personnel were secured and staged in the panhandle of Florida on September 10th until it was safe to travel down to our area.

On September 10th, 2017 Staff activated 24-hour cone (Ref. ERP). Final preparations were completed and PRECO personnel began to wait out the storm.

On September 11th, 2017 Phase II (During the Hurricane) of the ERP was implemented (Ref. ERP). When wind speeds caused the local EOC's to halt Emergency Service, PRECO halted any outage response efforts until it is once again safe to do so.
On September 11th, 2017 Phase III (Mobilization) of the ERP. Once the storm had safely passed, and internal employees began to report for work, an Employee roll call was checked and assessments areas by internal crews were assigned.
On September 11th, 2017 Phase IV (Repair and Restoration), and Phase V (Clean Up) (Ref. ERP) was in progress. Pre-staged contract crews began travel to PRECO headquarters and would arrive around 7:00 pm for check-in and registration. Work began pre-assigned areas first thing on September 12th, 2017.

On September 13th, 2017 PRECO had an additional contractor arrive from Oklahoma totaling 23 people from being staged outside PRECO service area. In addition, PRECO also had Right-of-Way tree trimming crews that consisted of 24 people arrive into the service area.

On September 14th, 2017 PRECO had an additional 10 person contracting crew come in to assist with restoration. Mutual Aid Contract crews in the southeast began to be released for work in Florida and 47 personnel were requested and secured to begin travel down to our area.

On September 16th, 2017 PRECO had the following mutual aid cooperatives arrive and begin working in our service area:
9 Cooperatives from Indiana, 20 line personnel.
1 Cooperative from Alabama, 6 line personnel.
1 Cooperative from Mississippi, 8 line personnel.
1 Cooperative from Georgia, 13 line personnel.

On September 19, 2017 Repairs and restoration was deemed complete for all services not requiring customer repair. PRECO released 2 large contracting crews and 1 mutual aid crew to a neighboring cooperative.

22. Please explain how the Utility validates adherences and departures from its storm preparation plan. During a storm, an internal staff progress review meeting is conducted daily once a major storm is within the 5-day impact horizon and continues throughout the final stages. Each area of responsibility in the ERP has specific tasks that must be completed at each stage of the storm preparation, restoration and clean-up process. Following a storm, updates or changes will be made to the ERP once executive staff has had time to review. Prior to storm season each year, the ERP is reviewed, updated and table-top tested.

    a. If the Utility does not assess departures from its storm plan, explain why not.

    b. If the Utility does not document or otherwise memorialize departures from its storm plan, explain why not..

    c. Have departures from the Utility's storm preparation plan resulted in modification of the storm preparation plan during 2015 through 2017? If so, please explain how with examples. The ERP is fine-tuned and adjusted from time to time, but the key aspects and order still remain. An example would be applying more detailed and streamlined ways to do damage assessments with drones. Up until now this technology as not been available but does allow for quicker field audits and patrols for areas that may be flooded or inaccessible by vehicle. PRECO is looking at ways to use this and other technology to improve the efficiency of assessments, but the order and general method of a damage assessment must still remain as it is in the plan for the ERP to remain effective.

Outages

23. Please identify all counties, including reporting regions/division for each county if applicable, that were impacted (had outages or damage) due to Hurricanes Matthew, Hermine, Irma, Maria, and Nate.
    i. For Matthew, Brevard, Desoto, Hardee, Indian River, Manatee, Osceola, Polk
    ii. For Irma, Brevard, Desoto, Hardee, Highlands, Hillsborough, Indian River, Manatee, Osceola, Polk, Sarasota

24. Please complete the table below summarizing the wind speed and flooding impacts by county in the utility's service area. If the requested information is not available by county, please provide the information on a system basis. Please provide this information for Hurricanes Matthew, Hermine, Irma, Maria, and Nate.

Hurricane Matthew:

County	Max Sust	Max Gust	Rainfall
Desoto	0	0	No info avail
Hardee	0	0	No info avail
Manatee	0	0	No info avail
Osceola	49	59	No info avail
Polk	36	44	No info avail

Hurricane Irma:

County	Max Sust	Max Gust	Rainfall
Brevard	48	58	No info avail
Desoto	77	93	No info avail
Hardee	66	79	No info avail
Highlands	70	85	No info avail
Hillsborough	56	68	No info avail
Indian River	57	69	No info avail
Manatee	62	75	No info avail
Osceola	55	67	No info avail
Polk	59	71	No info avail
Sarasota	64	75	No info avail

Hardened and Non-Hardened Structures

25. Please provide a county map or graphic indicating the geographic locations where the Utility's infrastructure was storm hardened after 2006. For purposes of this question, do not include vegetation management. **Map is provided in Exhibit B. Lines highlighted in Blue have been hardened since 2006.**

26. Please complete the table below summarizing hardened facilities that required repair or replacement as a result of Hurricanes Matthew, Hermine, Irma, Maria, and Nate.

Hardened Facilities		
Hurricane	**Number of Facilities Requiring**	
	Repair	**Replacement**
Transmission		
Structures	0	0
Substations	0	0
Total	0	0
Distribution		
Poles	0	0
Substation	0	0
Feeder OH	0	0
Feeder UG	0	0
Feeder Combined	0	0
Lateral OH	0	0
Lateral UG	0	0
Lateral Combined	0	0
Total	0	0
Service		0
Service OH	0	0
Service UG	0	0
Service Combined	0	0
Total	0	0

27. Please complete the table below summarizing non-hardened facilities that required repair or replacement as a result of Hurricanes Matthew, Hermine, Irma, Maria, and Nate.

Non-Hardened Facilities		
Hurricane	**Number of Facilities Requiring**	
	Repair	**Replacement**
Transmission		
Structures	12	0
Substations	0	0
Total	12	0
Distribution		
Poles	0	203
Substation	0	0
Feeder OH	11	0
Feeder UG	0	0
Feeder Combined	0	0
Lateral OH	84	2
Lateral UG	0	0
Lateral Combined	0	0
Total	95	205
Service		
Service OH	32	17
Service UG	1	3
Service Combined	1	0
Total	34	20

28. For Hurricanes Matthew, Hermine, Irma, Maria, and Nate, please provide a ranking of the five highest volume of outage causation that impacted the Utility's service area. **Hurricane Matthew-** 1-Tree Failure from Overhang or Dead Tree, 2-Wind, 3-Tree Growth; **Hurricane Irma**-1-Wind, 2- Downed Line Conductor Wire, 3-Poles and Fixtures Damage, 4-Tree failure from Overhang or Dead Tree, 5-Flood

29. For Hurricanes Matthew, Hermine, Irma, Maria, and Nate, please provide a ranking of the top five drivers that protracted service restoration time. 1. Third-party transmission service restoration, 2. The need to do Safe work during daylight hours only. 3. Transportation on the interstate system following the storm for support, 4. Travel and staging into the storm's path. 5. Access, logistic, and transportation constraints due to flooding to perform damage assessments and system repairs.

30. If applicable, please describe any damage prevented by flood monitors during Hurricanes Matthew, Hermine, Irma, Maria, and Nate. PRECO is not aware of any such instances.

31. How many outages were avoided by automated feeder switches during Hurricanes Matthew, Hermine, Irma, Maria, and Nate? Please explain how the data for each event was collected. No automated events were observed that would have prevented outages for Matthew or Irma.

Critical Infrastructure Restoration

32. Please complete the table below for all critical infrastructure facilities (CIFs), by location (city/county) and facility type, which lost power, the restoration time for the CIFs and the cause of the outage (such as wind, storm-surge, flooding, debris, etc.) and facilities structure type that required replacement and/or repair. Please provide this information for Hurricanes Matthew, Hermine, Irma, Maria, and Nate. PRECO does not serve a hospital. Please define the term "critical infrastructure facility" for a more detailed explanation.

Hurricane (Name) – CIF						
CIF Name/Type (i.e. Hospital)	**County/ Location**	**Restoration Time**	**Outage Cause**	**Number of Facilities Requiring**		
					Repair	**Replace**
				Transmission		
				Structures		
				Substations		
				Total		
				Distribution		
				Poles		
				Substation		
				Feeder OH		
				Feeder UG		
				Feeder Combined		
				Lateral OH		
				Lateral UG		
				Lateral Combined		
				Total		
				Service		
				Service OH		
				Service UG		
				Service Combined		
				Total		

Underground Facilities

33. Please provide an assessment of the performance of underground facilities during Hurricanes Matthew, Hermine, Irma, Maria, and Nate. As part of this assessment please summarize the number of underground facilities that required repair or replacement for each event. There was no damage to our underground system incurred during any of the listed storms. The PRECO underground system has not yet been in the direct storm path as most of our undergrounded system is in Manatee County.

34. Please provide a discussion what programs/tariffs the utility has in place to promote
    a. Undergrounding of new construction (e.g., subdivisions) All new subdivisions have the option of PRECO providing an undergrounded system as a part of our line extension policy at the difference in cost to provide an overhead system.

b. Conversion of overhead to underground PRECO reviews each rebuild area or problem area for repeat outages and estimates the cost benefits of conversion from overhead to underground if economics warrant such a decision. In some cases, it has been the choice to underground simply on the basis of access or clearance purposes. In addition, any member wishing to underground all or part of PRECO lines may do so as a part of our line relocation or line extension policy.

Please file all responses electronically no later than December 15, 2017 from the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please contact me at wtaylor@psc.state.fl.us or at 850.413.6175 if you have any legal questions, or contact Emily Knoblauch for technical questions at eknoblau@psc.state.fl.us or at 850.413.6632.

Sincerely,

/s/*Wesley Taylor*

Wesley Taylor
Attorney

WDT/as

cc: Office of Commission Clerk
Office of Public Counsel (kelly.jr@leg.state.fl.us, sayler.erik@leg.state.fl.us)

Hurricane Irma 2017

Peace River Electric Cooperative, Inc.
Your Touchstone Energy® Cooperative
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PO Box 1310
210 Metheny Road
Wauchula, Florida 33873
1.800.282.3824

DISASTER	PROJECT NO.	PA ID NO.	DATE	CATEGORY
FEMA- **4337** -DR-			**September 11, 2017**	

APPLICANT	COUNTY
Peace River Electric Cooperative, Inc.	**DeSoto**

DESCRIPTION: **23-090**

Latitude	Longitude	Altitude	GPS Direction
27.154066	**-81.968544**	**0**	**145**

Hyperlink To Google Maps:
https://www.google.com/?gws_rd=ssl#q=27.154066,+-81.968544&*

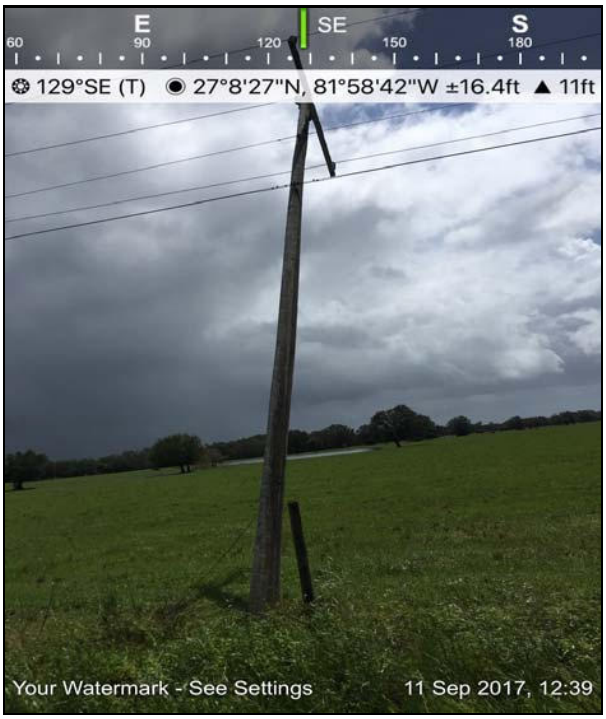
BROKE POLE - REPLACE - RETIRE 40-5 C1-3 M2-1 E1-2 F4-2 ADD 40-4 NPC2XR H1.1 E1.1 E3-10 F2.6

Click here to view large photo:
FMcClelland_20170913_IMG_0033.JPG

For Engineering Purposes - Record ID #: **322**

DISASTER	PROJECT NO.	PA ID NO.	DATE	CATEGORY
FEMA- **4337** -DR-			**September 11, 2017**	

APPLICANT	COUNTY
Peace River Electric Cooperative, Inc.	**DeSoto**



DESCRIPTION: **23-105**

Latitude	Longitude	Altitude	GPS Direction
27.140898	**-81.978531**	**3**	**129**

Hyperlink To Google Maps:
https://www.google.com/?gws_rd=ssl#q=27.140898,+-81.978531&*

BROKE POLE - REPLACE - RETIRE 40-5 VC1PF M2-1 ADD 40-4 VC1PFR H1.1

Click here to view large photo:
FMcClelland_20170913_IMG_0037.JPG

For Engineering Purposes - Record ID #: **324**

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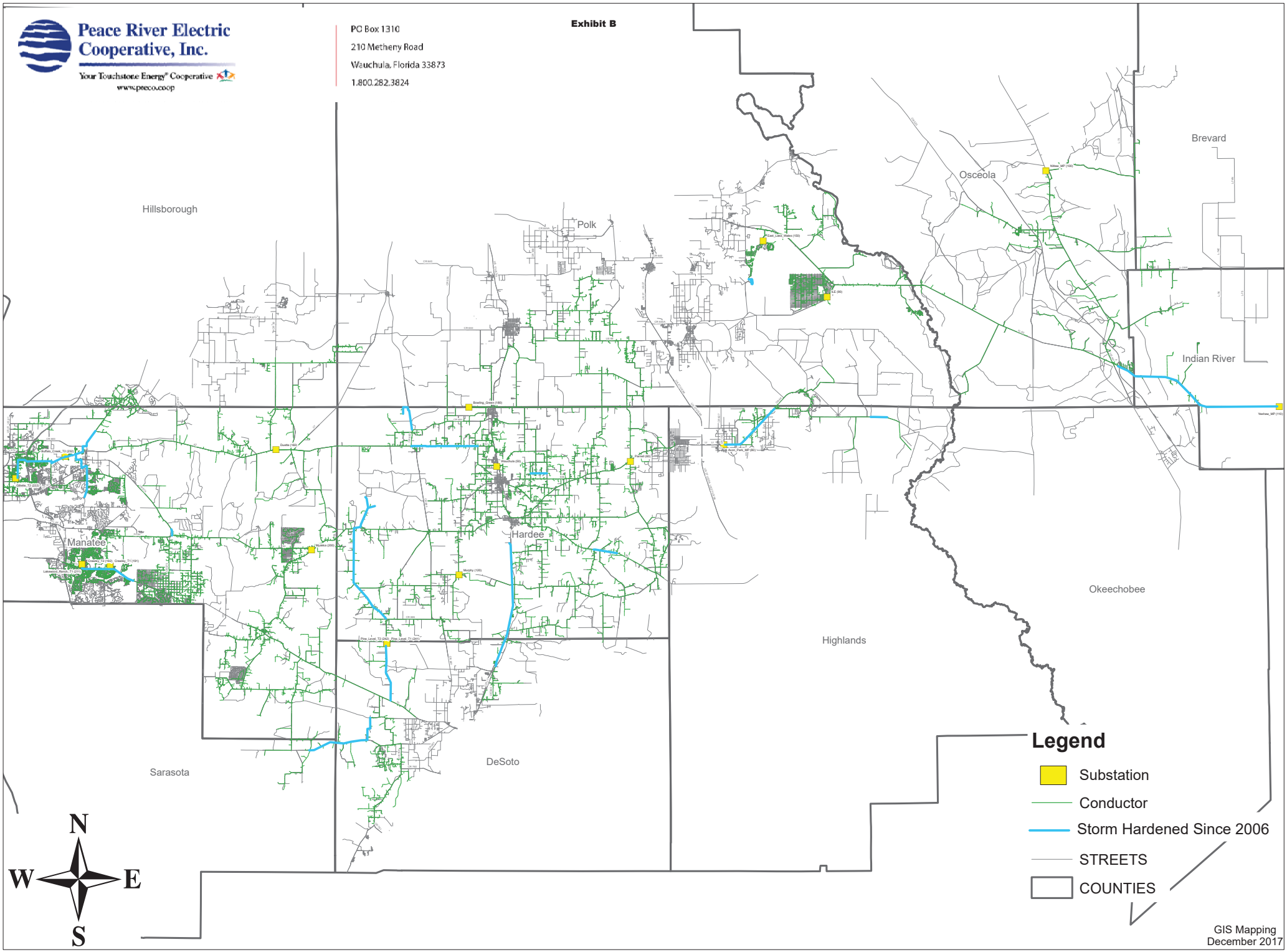
Exhibit B



GIS Mapping
December 2017