

Staff's Second Data Request Gulf Coast Electric Cooperative

December 18, 2017

Docket No. 20170215-EU – Review of electric Utility hurricane preparedness and restoration actions

FECA and its member-cooperatives are attempting to consolidate its answers to questions 1 – 4 below. If PSC staff needs more detail on any of these questions please reach out the individual co-op at a later date.

Question 1: Between 2006 and 2017 Florida Electric Cooperatives Association's (FECA) member-cooperatives have consistently hardened facilities and put lines underground after evaluating the costs and benefits of doing so. Each distribution cooperative files a Standards of Construction report to the PSC annually. This report describes the activities pursued by each cooperative in various required areas in order to mitigate damage caused by extreme weather. Stronger and taller poles are being utilized and undergrounding is pursued when viable, especially in new subdivisions. In addition to the PSC reporting requirements, FECA's member-cooperatives who are Rural Utilities Services (RUS) borrowers are required, under the terms of their financial arrangements, to abide by the strict RUS guidelines and standards for construction and maintenance of facilities, including building to extreme loading standards when necessary.

***Please provide your OH/UGD ratio of your whole system:

4.95mi of OH to 1 mi of UG (2158.44:436.15)

Question 2: After clarifying discussions with PSC staff, we believe the Commission wants information on the root causes of damaged infrastructure. Most of the damage to electric cooperatives' electric facilities during the hurricanes came from trees on the lines and falling on other infrastructure.

Do you perform a forensic review after a hurricane? yes, no

Although “lessons learned” evaluation is an important part of any storm restoration plan, Gulf Coast Electric Cooperative was not heavily affected by the hurricanes of 2017, so no forensic evaluation was performed.

Question 3: Electric cooperatives have a strong local connection to their communities and have established relationships with their local governments. Coordination with non-EOC related efforts with local governments is an on-going process and includes discussions on maintenance of rights-of-ways and any other projects involving the cooperative.

Please provide any specifics on tree trimming: Gulf Coast Electric Cooperative’s line construction specifications are to clear twenty (20) ft. and thirty (30) ft. width of Right-Of-Way for single-phase and three-phase construction respectively, meanwhile, GCEC is actively reclaiming all existing ROW, including removal of trees that would fall in GCEC ROW. This is being accomplished by taking time to educate property owners on the importance of clear ROW and the instruction as to what trees or plants can be planted around the ROW.

Question 4: All of FECA’s electric cooperative have established relationships with their local Emergency Operations Centers and are in constant contact with EOC personnel before, during and after a storm event. Storm preparation and restoration are discussed and coordinated with local EOCs including identifying critical infrastructures. This contact may be in person, via e-mails, phone calls or texts. All contact numbers for key staff at the cooperative are given to local EOCs to ensure communication remains open at all times.

FECA provides the State EOC with contact for information for all of its employees. FECA’s storm book includes all EOC staff emails and telephone numbers. If necessary and requested, FECA will have a person on hand at the State EOC during an event but we have not found this particularly more useful or beneficial.

For Questions 5-11:

FECA does not believe its member-cooperatives encountered any interconnection problems with customer-owned solar generation during any of the hurricanes that occurred in 2015-2017. At this time, we do not believe our members are contemplating any major changes to rules or tariffs pertaining to utility interconnections with customer-owned solar generation. In addition, no problems or failures were reported at Seminole's utility-scale solar generator.

Please provide details on any problems related to customer-owned generation during the hurricanes: As mentioned earlier, Gulf Coast Electric Cooperative was not heavily impacted by the hurricanes of 2017 and did not experience any difficulties with customer-owned generation during the hurricanes; however, the safety of line personnel and the public are the first priority during storm restoration, and therefore GCEC inspects each generation interconnections for proper relaying and controls at the time of their installation.

STATE OF FLORIDA

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Public Service Commission

December 18, 2017

STAFF’S SECOND DATA REQUEST
via email

To:

Duke Energy Florida, LLC (Matthew.Bernier@duke-energy.com, dianne.triplett@duke-energy.com)
Florida Power & Light Company (ken.rubin@fpl.com, kevin.donaldson@fpl.com)
Florida Public Utilities Company (bkeating@gunster.com)
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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.

Underground Facilities

- For each year, please complete the following tables summarizing the number of miles of transmission and distribution underground facilities by county from 2006 through 2017.

Transmission			
Year			
County	Overhead to Underground	New Construction	Total Miles

Distribution			
Year			
County	Overhead to Underground	New Construction	Total Miles

Forensic Data

2. For Hurricanes Hermine, Matthew, Irma, Maria, and Nate, please provide a complete copy of the utility’s post-storm forensic review of damaged infrastructure. If a forensic review was not performed or not documented, please explain why.

Coordination

3. For Hurricanes Hermine, Matthew, Irma, Maria, and Nate, please provide the name, frequency, and description of non-Emergency Operations Centers related coordination efforts with local governments before, during, and after restoration, including the following.
 - a. Storm preparation
 - b. Critical infrastructure
 - c. Tree trimming, planting or relocation of trees
 - d. Hardening and underground projects
 - e. Shared facilities
 - f. Other

4. Please complete the following tables on county and state Emergency Operations Centers staffing for Hurricanes Hermine, Matthew, Irma, Maria, and Nate.

Staffing for County Emergency Operations Centers		
Number of Utility Personnel	Function	Total Man-Hours

Staffing for State Emergency Operations Center		
Number of Utility Personnel	Function	Total Man-Hours

Solar

5. Please provide the following information for utility interconnections with customer-owned solar generation that did not operate as designed and consistent with the tariff during the extreme weather events that occurred in 2015 through 2017.
 - a. The number of failures.
 - b. A description of the cause or causes of such failures.
 - c. Possible failure remediation and associated cost.
 - d. Discuss whether the failures contributed to an increase or decrease in the utility’s service restoration time and, if possible, provide an estimate of the duration impact.
 - e. Discuss whether the failures contributed to an increase or decrease in the utility’s service restoration costs and, if possible, provide an estimate of the restoration cost impact.

6. Please provide the following information for utility interconnections with customer-owned solar generation that operated as designed and consistent with the tariff during the extreme weather events that occurred in 2015 through 2017.
 - a. Discuss whether these interconnections contributed to an increase or decrease in the utility’s service restoration time and, if possible, provide an estimate of the duration impact.

- b. Discuss whether these interconnections increased or decreased the utility's service restoration costs and, if possible, provide an estimate of the restoration cost impact.
7. Without compromising safety, are there changes to the utility's interconnection with customer-owned solar generation that would enable the customer's facilities to be energized by its solar generation should the utility be unable to provide electric service due to a future storm damaging utility infrastructure?
- a. If yes, please provide the following information:
- Please describe the suggested changes to the utility's interconnection.
 - If the utility is not pursuing the interconnection changes please explain why.
8. Without compromising safety, please describe potential changes to a customer's facilities that the customer can implement to enable the customer's facilities to be energized by its solar generation should the utility be unable to provide electric service due to a future storm event that damages utility infrastructure. Include in your response whether the utility makes it a practice to inform the customer of such options.
9. Without compromising safety, please describe any potential changes to rules or tariffs pertaining to utility interconnections with customer-owned solar generation that would enable the customer's facilities to be energized by its solar generation should the utility be unable to provide electric service due to a future storm event that damages utility infrastructure.

10. Please provide the following information for utility interconnections with utility-scale solar generation that did not operate as designed during the extreme weather events that occurred in 2015 through 2017.
 - a. The number of failures.
 - b. A description of the cause or causes of such failures.
 - c. Possible failure remediation and associated cost.
 - d. Discuss whether the failures contributed to an increase or decrease in the utility's service restoration time and, if possible, provide an estimate of the duration impact.
 - e. Discuss whether the failures contributed to an increase or decrease in the utility's service restoration costs and, if possible, provide an estimate of the restoration cost impact.

11. Please provide the following information for utility interconnections with utility-scale solar generation that operated as designed during the extreme weather events that occurred in 2015 through 2017.
 - a. Discuss whether these interconnections contributed to an increase or decrease in the utility's service restoration time and, if possible, provide an estimate of the duration impact.
 - b. Discuss whether these interconnections increased or decreased the utility's service restoration costs and, if possible, provide an estimate of the restoration cost impact.

Please file all responses electronically no later than January 18, 2018 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)