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February 12, 2018

E-PORTAL FILING

Ms. Carlotta Stauffer, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

Dear Ms. Stauffer:

Attached for filing, please find the Responses of Florida Public Utilities Company to Commission Staff's Third Set of Data Requests to the Company.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Kind regards,



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MEK

STAFF'S THIRD DATA REQUEST

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

1. Please provide the following information for an instance where storm hardened structures incurred damage and required repair or replacement due to Hurricane Irma.
 - a. A description of the damage incurred (i.e. broken pole, displaced underground vault, etc.).
 - b. A description of the repair process, including a description of any temporary repairs that required a follow-up trip.
 - c. A description of the repair process if the facilities had not been hardened.

Company Response:

- a. **FPUC had no storm-hardened structures damaged, repaired or replaced due to Hurricane Irma.**
- b. N/A
- c. N/A

2. In Order No. PSC-06-0351-PAA-EI, the Commission ordered Florida's investor-owned utilities to file plans for Ten Storm Preparedness Initiatives. The Ten Initiatives are:
 - Three-Year Vegetation Management Cycle for Distribution Circuits
 - Audit of Joint-Use Agreements
 - Six-Year Transmission Inspections
 - Hardening of Existing Transmission Structures
 - Transmission and Distribution Geographic Information System
 - Post-Storm Data Collection and Forensic Analysis
 - Collection of Detailed Outage Data Differentiating Between the Reliability Performance of Overhead and Underground Systems
 - Increased Utility Coordination with Local Governments
 - Collaborative Research on Effects of Hurricane Winds and Storm Surge
 - A Natural Disaster Preparedness and Recovery Program

Please provide suggested improvements, if any, to the Ten Initiatives, including modifications to existing initiatives and/or possible alternatives, based on lessons learned.

Company Response:

FPUC's current Vegetation Management cycle is 3 years for feeders and 6 years for laterals, which we feel would be more efficient if we trimmed all of the laterals associated with the feeders at the same time as the feeders. This would allow us to keep the trim crews in the same general area instead of moving them to a different feeder or lateral. We have started testing this in several locations and it has been successful with improvements in trimming quantities. To accomplish this for our entire system would require FPUC to modify the cycles for both feeders and laterals to either a single 4 or 5 year cycle.

FPUC's Hardening of Existing Transmission Structures consists of replacing inspected wood poles that fail inspection, during our 8-year cycle, with concrete poles meeting NESC and FPSC extreme wind requirements. A more efficient and cost effective method would be to replace a specific number of wood poles with concrete each year in a designated area.

FPUC does not have suggestions or improvements on any of the other initiatives.

3. Please provide suggested improvements, if any, to the 8-year wooden pole inspection program, including modifications to the existing program and/or possible alternatives, based on lessons learned.

Company Response:

The program appears to be working as expected. Therefore, no modifications are being suggested.

4. Please provide suggested improvements, if any, to the electric infrastructure storm hardening plan filed pursuant to Rule 25-6.0342, F.A.C., including modifications to the existing rule and/or possible alternatives, based on lessons learned.

Company Response:

The program appears to be working as expected. Therefore, no modifications are being suggested.

5. Assuming Gulf decreased its feeder vegetation cycle from its current 3 year cycle to a 2 year cycle, please provide the following:
 - a. Additional cost per year.
 - b. Incremental benefits (e.g. reduced number of outages)

Company Response:

Our response assumes that the question referred to FPUC and not Gulf.

- a. **FPUC estimates changing from a three year cycle to a two year cycle would approximately double our costs per year for feeders. Feeders make up 20% of our vegetation management costs.**
 - b. **We project an estimated 30% decrease in vegetation caused feeder outages per year based on this change.**
6. Assuming Gulf decreased its lateral vegetation cycle from its current 4 year cycle to a 3 year cycle, please provide the following:
- c. Additional cost per year.
 - d. Incremental benefits (e.g. reduced number of outages)

Company Response:

Our response assumes that the question referred to FPUC and not Gulf and that you are referring to changing from a 6-year cycle to a 5-year cycle and not the 4-year cycle to 3-year cycle referred to for Gulf.

- c. **FPUC estimates changing its later vegetation cycle from the current 6-year cycle to a 5-year cycle would add approximately 20% to our overall vegetation management costs.**
- d. **FPUC estimates this change in later vegetation cycle would decrease vegetation caused outages by approximately 15% per year.**