Gulf Power

C. Shane Boyett
Regulatory and Cost Recovery Manager

One Energy Place
Pensacola, FL 32520-0780
850 444 6209 tel
850 444 6026 fax
csboyett@southernco.com

November 15, 2018

Ms. Carlotta Stauffer
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0868

Re: Docket No. 20180147-EI – Review of 2019-2021 storm hardening plan, Gulf Power Company

Dear Ms. Stauffer:

Attached is Gulf Power Company's response to Staff's First Data Request in the above-referenced docket.

Sincerely,

C. Shane Boyett

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Attachments

cc w/att.: Gulf Power Company
Jeffrey A. Stone, Esquire, General Counsel
Beggs & Lane
Russell Badders, Esq.
Florida Public Service Commission
Johana Nieves, Office of General Counsel

1. *Commission staff should collect additional details regarding meeting with local governments regarding vegetation management and identification of critical facilities as part of the Commission's review of utility storm hardening plans.*

   Please discuss the Utility's coordination with local governments. As part of this discussion, please describe any lessons learned following recent storm events.

   Additionally, please complete the table below for the year 2018.

RESPONSE:

Gulf Power's Utility Arborist meets with and interacts with city and county officials on a routine basis to discuss Vegetation Management (VM) schedules, plans, and issues. Gulf's Arborist calls upon city and county representatives and provides maps showing where VM contractors will be trimming and to work with them in sensitive areas. Occasionally, the city or county will contract with a private arborist to consult with Gulf Power and the city/county. Some cities require five days' notice before trimming can begin and the Utility Arborist works with them to provide the necessary schedule and plan. Gulf Power's Utility Arborist communicates with and works with city and county representatives to ensure that vegetation is maintained in a way that does not affect the reliability of the electric system while at the same time meeting the requirements and desires of the governing body when possible.

Gulf Power has a very robust plan for communicating with city and county officials and representatives though numerous channels. Gulf's District Managers meet regularly with officials on many topics including storm restoration procedures and priorities. Gulf's Account Managers meet regularly with local/county governmental representatives to ensure good communication and planning. These meetings, usually in the Spring, include discussions around storm restoration plans, procedures, and priorities. Because these topics are discussed as part of normal business, they have not been tracked or logged in the past. The below chart represents just a sample of those meetings and discussions. Going forward Gulf will log and have available such meetings.

Meetings with Local Government					
Entity	**Date(s)**	**Topics**	**Pending Issues/Follow-up Items**	**Contact information provided to local authorities**	
				Y	**N**
City of Panama City	5/14/18	VM	None	Y	
Washington County	5/24/18	Storm	None	Y	
Jackson County	5/24/18	Storm	None	Y	
Escambia County	5/29/18	Storm	None	Y	
Bay County	6/8/18	Storm	None	Y	
League of Cities	6/11/18	Storm	None	Y	

2. *Commission staff should collect additional details regarding utility staffing practices at local EOCs as part of the Commission's review of utility storm hardening plans.*

Please discuss the Utility's planned staffing practices at local EOCs. Please address in this discussion the total number of Utility personnel available to work in EOCs, the responsibilities of Utility personnel that work in EOCs, how the Utility communicates with EOCs that may not be staffed, and any lessons learned from storm events.

Additionally, please complete the table below, listing all local EOCs in Utility's service territory.

RESPONSE:

Gulf Power works with and staffs the local county Emergency Operations Centers (EOC) during emergencies. There are twelve employees currently assigned to county EOCs. These assignments serve as their storm duty with Gulf Power. Assigned employees may support multiple EOC locations depending on the event and needs of the county, and Gulf has the ability to move personnel between the counties to ensure that each county has adequate resources.

Gulf also has personnel that staff the State EOC as needed when the SEOC is activated during an emergency.

Gulf Power personnel are assigned to ESF-12, which operates to restore infrastructure that delivers energy services to the community. Their main function is to take information gathered within the EOC and other functions, prioritize it, and process it within Gulf Power to provide progress reports and restoration status back to the EOC personnel and management. Communication is facilitated through the EOC Team Leader (TL) located in the Gulf Power Corporate Emergency Management Center (CEMC) as a single point of contact during an event.

If there is a County EOC that is not staffed during an event, communications will be handled through one of two methods; 1) The Gulf Power District General Manager for that area will provide contact information and maintain contact with the EOC Manager; and 2) the Gulf Power EOC staff in an adjacent county will provide contact information and maintain contact with the EOC Manager, as required.

Lessons Learned - Communication is the key to ensuring that energy services are restored safely and efficiently to the communities we serve. To accomplish this, Gulf has developed a communication plan for the Gulf Power EOC team that standardizes information flowing to and from the EOC, State EOC and Gulf Power CEMC. These communication documents establish set times for calls, check-ins, and provide both a

high level and tactical level picture of the EOC and the Gulf Power territory. These communication documents are also kept as a log for after-action reports and lessons learned.

Utility staffing practices at local EOCs		
EOC in Service Territory	**Number of Utility staff**	**Planned daily hours scheduled for working in the EOC**
Bay County	2	13-hour shift[1,3]
Calhoun County	1	13-hour shift[1,2,3]
Escambia County	3	9-hour shifts[1]
Holmes County	1	13-hour shift[1,2,3]
Jackson County	1	13-hour shift[1,2,3]
Okaloosa County	2	13-hour shift[1,3]
Santa Rosa	3	9-hour shifts[1]
Walton County	1	13-hour shift[1,2,3]
Washington County	1	13-hour shift[1,2,3]
State EOC	4	8-hour shift

Note 1: *Utility personnel will only staff the EOCs when the EOC has raised their activation level above LEVEL 3 or when requested by the EOC Director/Manager, typically 24-48 hours prior to storm landfall.*
Note 2: *Under prolonged activation of the EOC, the Gulf Power EOCTL may reallocate staffing from other EOCs to ensure proper staffing levels are maintained pursuant to a variety of factors to include (but not limited to), severity of storm damage within the EOC area of responsibility, requests made by the EOC Manager/Director, activation level of the EOC and the need to run 24 hour operations.*
Note 3: *The 13-hour shift (and 9-hour shift for Escambia County and Santa Rosa County) provide for a one-hour shift overlap to accommodate a turnover debrief between the on-coming and off-going EOC member (assuming the need for 24-hour coverage).*

3. Commission staff should collect information on how each IOU prepares for and responds to roadway congestion, fuel availability, and lodging accommodation issues as part of the Commission's review of utility storm hardening plans.

Please discuss the Utility's contingency planning for roadway congestion, fuel availability, and lodging accommodation including a timeline for when decisions are made (i.e. route selection, procuring fuel, locating of fuel sources, procuring lodging). As part of this discussion please describe any lessons learned following recent storm events as well as a discussion regarding the use of government resources during a storm event.

RESPONSE:

Gulf Power continues to work with local, state, and federal authorities on navigating roadway congestion both for internal travel as well as travel when supporting other utilities with restoration efforts. Gulf's Corporate Security team works daily with authorities and utilizes these contacts at all levels of law enforcement to facilitate the moving of crews, resources, and equipment in and/or too affected areas. Gulf first pursues the use of local law enforcement resources when available, and then request assistance from outside law enforcement through the State EOC and other means.

Gulf Power has been very successful at maintaining fuel supplies during major events that have affected the panhandle. To do so, Gulf uses its primary fuel supplier for "blue sky" days along with two backup suppliers that are able to provide not only fuel but fueling equipment and support personnel. Gulf has used these services in the past to support other utilities by making these services available as part of the storm restoration travel response. Gulf's Corporate Security provides security details for fueling locations and staging sites.

Gulf Power's Logistics team within the Corporate Emergency Management Center (CEMC) utilizes the Southern Company Disaster Resource Manager (DRM) system to track responding resources and provide lodging services. During large storm scenarios, contracts are in place for vendor lodging (mobile sleepers) and resources are secured within 48 hours prior to impact. For smaller events, lodging representatives assess room availability with local hoteliers prior to impact and make decisions to secure rooms. Once lodging requests are populated in the DRM system, room reservations are confirmed based on occupancy and gender. This process has allowed Gulf to meet the needs of responding resources in a flexible way that allows for changing conditions, and hotel room availability.

4. *Commission staff should collect information on all viable alternatives considered before selecting a particular storm hardening project as part of the Commission's review of utility storm hardening plans.*

Please discuss the Utility's process for identifying storm hardening projects. Please include in this discussion, information regarding the economic considerations, historic reliability considerations, geographic area (including weather impacts), and customer considerations (number of customers).

Additionally, please provide an example of a storm hardening project where alternatives were considered and explain why one alternative was considered over another.

RESPONSE:

Gulf Power's process for identifying storm hardening projects has evolved over the last several years. In the beginning, there was a focus on interstate crossings, double circuit pole lines, and key infrastructure. Areas that were tough to repair or would affect large numbers of customers. Storm hardening projects then migrated toward focusing on critical infrastructure such as hospitals, storm shelters, emergency operations centers, and others. More recent projects continue to be directed at critical infrastructure and may include more commercial corridors that would provide needed community support. Each year, Gulf Power evaluates possible projects based on input and collaboration from each of the companies operating districts as well as the marketing team to determine feeders that contain critical customers, large numbers of customers, and/or feeders that may have experienced below normal reliability performance. Projects are then selected to allocate the resources among the three districts.

A recent example would be the case where two feeders with similar reliability were proposed as storm hardening projects. One feeder was rural and served mainly residential customers and the other feeder supplied a major transportation industry customer that could be critical to restoration efforts in the region. In this case, the industrial feeder was moved up on the priority list, and hardening the residential feeder will be re-evaluated the following year.

5. *Commission staff should explore the collection of uniform performance data for hardened vs. non-hardened and underground facilities, including sampling data where appropriate, as part of the Commission's review of utility storm hardening plans.*

Please discuss the type of data the Utility plans to provide demonstrating performance of hardened vs. non-hardened facilities affected by wind only. Please discuss the type of data the Utility plans to provide to compare overhead to underground facilities on a comparable basis. Please discuss any sampling data that may be readily available. Please include the format, economic considerations, and how the Utility would collect this data.

RESPONSE:

Gulf Power plans to collect forensic data on damaged facilities following a major event. The goal of the data collection would be to capture damage based on map tiles that were affected by the storm path. Pre-determined map tiles have been identified that would possibly allow for the collection of valid forensic data on hardened overhead, non-hardened overhead, and underground facilities that experienced similar weather conditions. The ability to collect damage that was brought about by similar weather conditions is key to evaluating the data. Collecting damage data over a wide area and then evaluating that data at a system level when wind speeds and other variables are at play would invalidate the possible findings.

Gulf has contracts in place with a vendor that will be available to provide data collection in an electronic format and deploy ahead of a major storm based on storm track information. These resources would be dispatched based on storm path and map tile information. Overhead data collection would include location, pole identifier, pole construction, devices, circuit information, wire size, anchors, damage description, break location, and cause of damage (debris, tree, wind only, etc.). Underground data collection would include location, identifier, damage description, and cause of damage. Gulf will not delay restoration activities to collect forensic data. If the contractor is not available to collect data Gulf has a plan to manually collect a limited amount of data using internal damage assessment teams as part of their identified line patrols and initial assessments. Substations and feeders would be identified as part of the backup plan and communicated to leaders in the field.

Gulf then plans to provide the available facility damage data to a third-party vendor for analysis and reporting. There are no economic considerations associated with the above plan.

6. *Commission staff should seek additional information on the impact of non-electric utility poles on storm recovery as part of the Commission's review of utility storm hardening plans.*

Please discuss the following:

a. Procedures followed if a non-electric utility pole is identified as being unstable or on the verge of failing.

b. Options an electric utility has if inspection of non-electric utility poles is not occurring.

c. Procedures followed when repairing/replacing non-electric utility poles during storm recovery (contact, billing, reimbursement, who does the repair).

d. Procedures followed when repairing/replacing non-electric utility poles during non-storm events (contact, billing, reimbursement, who does the repair).

e. General locations of poles – throughout the service territory or in a certain location.

Additionally, please complete the table below.

RESPONSE:

a. When Gulf Power has equipment on a non-electric utility pole that is identified as being a potential risk for failure due to deterioration or evident danger, the pole owner is informed of the condition per the pole attachment contract. Gulf works with the pole owner to get the pole replaced by the owner in a timely manner and facilities transferred.

b. Gulf Power does not have any options when it comes to the inspection of non-electric utility poles outside of Gulf paying to have those non-electric utility poles inspected as part of the normal eight-year inspection cycle.

c. Gulf Power has in place agreements with non-electric pole owners to replace poles during storm restoration and then invoice the non-electric utility pole owner for the labor and material associated with the replacement. The pole ownership of the pole is then transferred back to the non-electric utility pole owner.

d. Very similar to storm restoration above, Gulf Power has in place agreements with non-electric pole owners to replace poles during emergency situations (i.e. car accident) or when agreed upon between the companies to replace the pole and then invoices the non-electric utility pole owner for the labor and material associated with the replacement. The pole ownership of the pole is then transferred back to the non-electric utility pole owner.

e. Gulf Power's electric poles and non-electric utility poles are across its entire system. While there may be some areas of the company where there are higher percentages of non-electric utility poles, there are not specific areas or locations that dictate pole ownership.

Electric vs. Non-Electric Utility Poles							
Total Number of Utility Distribution Poles		**Total Number of Non-Electric Utility Distribution Poles that The Utility is attached to**		**Number of Attached Non-Electric Utility Distribution Poles Repaired following Irma**		**Number of Attached Non-Electric Utility Distribution Poles Replaced following Irma**	
Feeders	**Laterals**	**Feeders**	**Laterals**	**Feeders**	**Laterals**	**Feeders**	**Laterals**
202,706	*	62,686	*	0	**	0	**

**Gulf does not currently track poles on the distribution system by location on a feeder (mainline) or lateral.*

***Gulf had minimal damage from Hurricane Irma.*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Review of 2019-2021 storm hardening plan, Gulf Power Company)

Docket No.: 20180147-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by electronic mail this 15th day of November, 2018 to the following:

Office of Public Counsel
J. R. Kelly
Stephanie Morse
Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
kelly.jr@leg.state.fl.us
morse.stephanie@leg.state.fl.us

Office of the General Counsel
Jennifer Crawford
Johana Nieves
2540 Shumard Oak Blvd
Tallahassee, FL 32399-0850
jcrawfor@psc.state.fl.us
jnieves@psc.state.fl.us

RUSSELL A. BADDERS
Florida Bar No. 007455
rab@beggslane.com
STEVEN R. GRIFFIN
Florida Bar No. 0627569
srg@beggslane.com
Beggs & Lane
P. O. Box 12950
Pensacola FL 32591-2950
(850) 432-2451
Attorneys for Gulf Power