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

Public Service Commission

January 3, 2019

Ms. Beth Keating, Esq.
215 S. Monroe Street, Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

STAFF'S SECOND DATA REQUEST

RE: Docket No. 20180148-EI – Review of 2019-2021 storm hardening plan, Florida Public Utilities Company.

Dear Ms. Keating,

By this letter, the Commission staff requests that Florida Public Utilities Company (FPUC or Utility) provide responses to the following data requests.

1. Please refer to FPUC's response to question 1 of staff's first data request. Please explain what would be considered "routine basis."
2. Please refer to FPUC's response to question 2 of staff's first data request. Were there any lessons learned from recent storm events regarding the Utility's staffing at local EOCs?
3. Please refer to FPUC's response to question 3 of staff's first data request. The response indicates that the restoration of service to fueling stations is now higher on FPUC's priority list.
 - a. Is FPUC hardening the feeder and lateral lines that feed those fueling stations?
 - i. If not, please explain why not?
4. Please refer to FPUC's response to question 4 of staff's first data request. Please verify if shelters, wastewater treatment plants, 911 call centers, fire stations, and police stations are considered critical customers and are considered for storm hardening projects. If not, please explain why not?

Staff's Second Data Request to FPUC

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5. Please refer to FPUC's response to question 6 of staff's first data request.
 - a. How many different non-electric utility pole owners do you have attachment agreements with?
 - b. What is the percentage spread of ownership of the non-electric utility poles amongst those different entities?
6. Please refer to FPUC's response to questions 4, 5, and 6 of staff's first data request.
 - a. How does FPUC gather historical locational information for purposes of screening and/or selecting locations for storm hardening projects?
 - b. Does FPUC track this information on a GIS basis?
 - i. If not, please explain why not.

Please file all responses electronically no later than Friday, February 8, 2019, on the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing web Form. Please contact me at (850) 413-6524 if you have any questions.

Sincerely,

/s/ Johana Nieves
Johana Nieves
Office of the General Counsel

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cc: Office of Commission Clerk