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Public Service Commission

March 28, 2019

Mr. Kenneth M. Rubin, Esq.
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Ken.Rubin@fpl.com

STAFF'S THIRD DATA REQUEST

RE: Docket No. 20180144-EI – Review of 2019-2021 storm hardening plan, Florida Power & Light Company.

Dear Mr. Rubin,

By this letter, the Commission staff requests that Florida Power and Light Company (FPL) provide responses to the following data requests:

Please refer to FPL's storm hardening plan that was filed in Docket No. 20180144-EI.

National Electrical Safety Code (NESC) Compliance

- 1) Please refer to page 9 and page 4 of the addendum for extreme wind loading. Does FPL currently use the NESC construction grade B and Rule 250C for all situations when installing or replacing distribution facilities?

Extreme Wind Loading (EWL) Standards

- 2) Please refer to page 12 and page 45 of the addendum for extreme wind loading.
 - a. What is a "class 2" pole?
 - b. What is the difference between class 4, class 3 and class 2 poles?
 - c. How many classes of poles are there?
 - d. Which pole class is considered the strongest?
 - e. Are all class 2, class 3 and class 4 poles made of wood?
- 3) When does FPL use the Pole Foreman software?

- 4) Which version of the Pole Foreman software does FPL use?
- 5) Please refer to the addendum "Pole Sizing Guidelines," Feeder or Three Phase Lateral table. What is the meaning of accessible and inaccessible?

Mitigation of Flooding and Storm Surge Damage

- 6) Please refer to page 18.
 - a. Has FPL adopted and/or implemented any new procedure to build underground distribution to mitigate damage due to flooding and Storm Surges, like the installation of submersible equipment to mitigate the impact of significant water intrusion in the 12 Miami downtown electric network vaults?
 - b. Has FPL conducted any testing to check the reliability of the underground system in the event of flooding in the area where the underground system has been installed? If yes, please explain the results and findings.
 - c. Has FPL learned any lessons from previous underground projects? If yes, please explain the lessons learned.
 - d. Does FPL consider the terrain's characteristics, soil consistency, historical data and FEMA flooding maps when selecting the Storm hardening underground project selection? Please explain.

Facility Placement

- 7) On page 14, referring to undergrounding laterals, FPL reports that its goal is to have all overhead facilities, including non-electric facilities, converted to underground facilities. FPL also reports that some non-electric entities will elect to maintain their facilities overhead.
 - a. Has this been an issue with the underground lateral pilot program?
 - b. If the non-electric entity elected to maintain their facilities overhead, does FPL still own the poles?
 - c. If so, will FPL still harden the poles even though its facilities are underground?

Deployment Strategies

- 8) Please refer to page 15.
 - d. Why is there a large increase in the number of overhead laterals to underground conversions for 2020 and 2021 when compared to 2019 (250-500 laterals annually for 2020 and 2021, 2019 – 152 laterals)?

- e. Is the 3-year underground pilot program designed to underground all laterals?
 - f. Was there any changes to FPL's DCS from the 2016-2018 plan?
- 9) Please refer to page 17. Please explain the pole reinforcement method called the ET Truss.
- 10) Please refer to page 18. FPL reports as a lesson learned from Hurricane Sandy, the Utility installed submersible equipment in the downtown Miami distribution system. How did this equipment performed during Hurricane Irma?
- 11) Please refer to the Appendix. Please list each type of feeder hardening project with a total number for the 312 feeder projects listed in the Appendix. Include a description of the different types of projects.

Wooden Pole Inspection Program

- 12) Please provide a summary of FPL's Wooden Pole Inspection Program.

Ten Initiatives

- 13) Please provide a summary of FPL's Ten Initiatives.
- 14) Please complete the table attached.

Activity	Any change from current plan. (Y/N) *	Actual Cost									Estimated Cost								
		2016			2017			2018			2019			2020			2021		
		O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total
8-Year Wooden Pole Inspection Program																			
10 Storm Hardening Initiatives																			
1	A Three-Year Vegetation Management Cycle for Distribution Circuits																		
2	An Audit of Joint-Use Attachment Agreements																		
3	A Six-Year Transmission Structure Inspection program																		
4	Hardening of Existing Transmission Structures																		
5	Transmission and Distribution GIS																		
6	Post-Storm Data Collection and Forensic Analysis																		
7	Collection of Detailed Outage data Differentiating Between the Reliability Performance of Overhead and Underground Systems																		
8	Increased Utility Coordination with Local Governments																		
9	Collaborative Research on Effects of Hurricane Winds and Storm Surge																		
10	A Natural Disaster Preparedness and Recovery Program **																		
Totals																			
Any Other Key Elements or Proposed Initiatives																			

*Please explain any changes from the current plan
 ** Please provide a copy of the disaster plan

Staff's Third Data Request to FPL
March 28, 2019
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Please file all responses electronically no later than Thursday, April 18, 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) 413-6228 or Penelope Buys at (850) 413-6518 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Crawford". The signature is fluid and cursive, with a large initial "J" and "C".

Jennifer Crawford, Esq.
Office of the General Counsel

JSC/lms

cc: Office of Commission Clerk