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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, Florida Administrative Code, submitted by Gulf Power Company.

Docket No. 070299-EI

Filed: September 14, 2007

PREHEARING STATEMENT OF THE FLORIDA CABLE TELECOMMUNICATIONS ASSOCIATION, INC.

Pursuant to the Order Consolidating Dockets and Establishing Procedure, Order No. PSC-07-0573-PCO-EI, issued July 10, 2007, the Florida Cable Telecommunications Association, Inc. (FCTA) hereby submits its Prehearing Statement.

A. Known Witnesses

FCTA intends to offer the testimony of Michael T. (Mickey) Harrelson, dated September 7, 2007.

B. Known Exhibits

FCTA intends to sponsor the following exhibits for witness Michael T. Harrelson:

- MTH – 1 Curriculum Vitae/List of Previously Filed Testimony
- MTH – 2 Affidavit of Dr. Lawrence T. Slavin
- MTH – 3 Process to Engage Third Party Attachers
- MTH – 4 July 24, 2007, Harrelson letter to Alan McDaniel/Pole Inspections

C. Basic Position

Gulf's Storm Hardening Plan, submitted May 7, 2007, and amended August 14, 2007 ("Plan"), should not be approved by the Commission. While the FCTA does not oppose Gulf's proposal to adopt Grade B as the construction standard for its distribution facilities and to test extreme wind loading criteria on a limited pilot project basis, FCTA has serious concerns about Gulf's proposed deployment strategy for Grade B, which in many respects, is not prudent, practical or cost effective.

In addition, FCTA has concerns about the Attachment Standards and Procedures currently set forth in Gulf's Plan. Certain of Gulf's Attachment Standards and Procedures do not concern storm hardening and instead constitute rates, terms and conditions of attachment, which should be established through good faith contract negotiation with input from attachers as required by Rule 25-6.0342(6), F.A.C. and/or FCC resolution. While some of Gulf's Attachment Standards and Procedures relate to the impact of third party attachments on the strength and loading of the poles and thus, are appropriate for *consideration* in this Docket, they should not be *approved* by the Commission because they do not constitute a reasonably practicable method of meeting the Commission's overall objective of enhancing reliability and reducing restoration costs and outages, as required by Rule 25-6.0342, F.A.C.

Lastly, while the Plan still contains insufficient detail about joint use facilities impacted by the Plan as well as the technical design specifications, construction standards, and construction methodologies that Gulf intends to employ to enable cable operators to determine the cost impacts of the Plan to cable operators in Gulf's territory and to provide the level of input contemplated by Rule 25-6.0342(6), F.A.C., FCTA believes those concerns may be resolved by the proposed Process to Engage Third Party Attachers. The Process to Engage Third Parties, which ensures that information is provided to third party attachers during the design phase and throughout the construction phase of a project, that the Company will consider input from third party attachers, and that third party attachers can dispute the implementation of a particular project once detailed information is provided, should address FCTA's concern about the lack of detailed information in the Plan.

D. – F. Issues

27. Does the Company's Plan address the extent to which, at a minimum, the Plan complies with the National Electric Safety Code (ANSI C-2) [NESC] that is applicable to subsection 25-6.0345(2), F.A.C. [Rule 25-6.0342(3)(a)]

FCTA: Yes, the Company's Plan addresses the extent to which, at a minimum, the Plan complies with the NESC and yes, the Plan complies at a minimum with the NESC.

28. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)1]

FCTA: The Plan does not adopt EWL for new distribution facility construction and thus, FCTA takes no position on this issue.

29. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]

FCTA: The Plan does not adopt EWL criteria for major planned work and thus, FCTA takes no position on this issue.

30. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational consideration? [Rule 25-6.0342(3)(b)3]

FCTA: The Plan only adopts EWL for limited critical infrastructure pole projects and thus, FCTA takes no position on this issue.

31. Does the Company's Plan address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(b)(3)(c)]

FCTA: Based on the currently available information, FCTA takes no position on this issue.

32. Does the Company's Plan address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance pursuant to Rule 25-6.0341, F.A.C.? [Rule 25-6.0342(3)(d)]

FCTA: Based on the currently available information, FCTA takes no position on this issue.

33. Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]

FCTA: No. The Plan does not adequately *describe* the Company's deployment strategy. The proposed Process to Engage Third Party Attachers may well resolve FCTA's concerns about the lack of detail provided about Gulf's proposed pilot projects, but does not fully alleviate FCTA's concerns about the lack of detail in the Plan regarding Gulf's transition to Grade B construction or its Joint Use Pole Strength and Loading Assessments. Moreover, the Company's deployment strategy is not prudent, practical or cost effective, as required by Rule 25-6.0342.

34. Does the Company's Plan provide a detailed description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified

by the utility as critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3 are to be made? [Rule 25-6.0342(4)(b)]

FCTA: The Company's Plan provides a description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares. Moreover, the proposed Process to Engage Third Party Attachers likely resolves FCTA's concerns regarding the level of detail currently missing from Gulf's Plan pertinent to this issue.

35. Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]

FCTA: The Company's Plan provides a description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist. The proposed Process to Engage Third Party Attachers likely resolves FCTA's concerns regarding the level of detail currently missing from Gulf's Plan pertinent to this issue except that FCTA still has significant concerns about the lack of detail in the Plan regarding Gulf's transition to Grade B construction and its Joint Use Pole Strength and Loading Assessments.

36. Does the Company's Plan provide an estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]

FCTA: No, however, the proposed Process to Engage Third Party Attachers likely resolves FCTA's concerns regarding the level of detail currently missing from Gulf's Plan pertinent to this issue.

37. Does the Company's Plan provide an estimate of the costs and benefits, obtained pursuant to subsection (6) below, to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages realized by the third-party attachers? [Rule 25-6.0342(4)(e)]

FCTA: No. FCTA does not yet have enough information about the costs and benefits of Gulf's storm hardening plan to provide a specific estimate of the costs and benefits that Gulf's plan will have on its cable operator members. However, the costs that may be recovered from cable operators are tightly prescribed by the FCC. Cable operators may incur significant additional costs as a result of the Company's Plan. Operators may incur increased transfer costs, annual pole rental rates may increase, and the costs attendant to making the pole ready for third party attachments will increase. The number of cable operator attachments on which rents are paid may increase as additional poles are set in existing spans. It remains to be determined the extent to which the Company's Plan will benefit third parties. Given the uncertainty about the specific cost benefit impact on third party attachers, FCTA supports limited pilot projects and continued monitoring to enable affected parties to study the potential benefits of Gulf's planned hardening activities.

38. Does the Company's Plan include written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the

National Electrical Safety Code (ANSI C-2) that is applicable pursuant to Rule 25-6.034, F.A.C.?
[Rule 25-6.0342(5)]

FCTA: Yes. However, certain of the Attachment Standards and Procedures set forth in Gulf's Plan are not related to the Commission's overall objective of enhancing reliability or reducing restoration costs. Only those Attachment Standards and Procedures pertaining to the loading impact of third party attachments on the strength of poles relate to storm hardening and should be included in the Plan. All other details of Gulf's Attachment Standards and Procedures should not be in the Plan but, instead, should be established through good faith contract negotiation with input from attachers as required by Rule 26-06.0342(6), F.A.C. and/or FCC resolution. Furthermore, Gulf's Attachment Standards and Procedures that do relate to the loading impact of third party attachments do not constitute a reasonably practicable means of meeting the Commission's objectives of enhancing reliability and reducing storm related costs and outages, as is required by Rule 25-6.0342, F.A.C..

39. Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties. [Rule 25-6.0342(1) and (2)]

FCTA: No.

G. Stipulated Issues

FCTA agrees with AT&T, Verizon, Embarq, Gulf, FPL, TECO, and Progress that the proposed Process to Engage Third Party Attachers will alleviate concerns regarding the level or required detail currently missing from the Plan. FCTA is not a party to any other stipulations at this time.

H. Pending Motions

FCTA has no pending motions or other matters requiring attention at this time.

I. Pending Confidentiality Requests

FCTA has no pending confidentiality requests.

J. Compliance With Order on Procedure

FCTA believes that this Prehearing Statement fully complies with the requirements of the Order Consolidating Dockets and Establishing Procedure, Order No. PSC-07-0573-PCO-EI.

K. Objections to Witness Qualifications

FCTA has no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 14th day of September, 2007.

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BEFORE THE PUBLIC SERVICE COMMISSION

In re: Review of 2007 Electric Infrastructure)
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25-6.0342, F.A.C., submitted by Gulf Power)
Company.)

DOCKET NO. 070299-EI

Filed: September 14, 2007

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Prehearing Statement of the Florida Cable Telecommunications Association, Inc. in Docket No. 070299-EI was served via Electronic Mail and First Class US Mail to the persons listed below on this 14th day of September, 2007:

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Docket No. 070299-EI
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Docket No. 070299-EI
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