



Jennifer S. Kay
Senior Attorney
Legal Department

AT&T Florida
150 South Monroe Street
Suite 400
Tallahassee, FL 32301

T: (305) 347-5332
F: (305) 375-0209
jennifer.kay@att.com

September 14, 2007

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

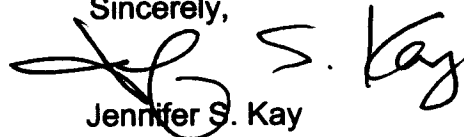
Re: **Docket No. 070297-EI**: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by Tampa Electric Company
Docket No. 070298-EI: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by Progress Energy Florida, Inc.
Docket No. 070299-EI: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by Gulf Power Company
Docket No. 070301-EI: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, FAC, submitted by Florida Power & Light Company

Dear Ms. Cole:

Enclosed is BellSouth Telecommunications, Inc. d/b/a AT&T Florida's Prehearing Statement, which we ask that you file in the captioned dockets.

Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,



Jennifer S. Kay

cc: All Parties of Record
Jerry D. Hendrix
E. Earl Edenfield, Jr.
James Meza III

CERTIFICATE OF SERVICE
Docket Nos. 070297-EI, 070298-EI, 070299-EI and 070301-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Electronic Mail, (*) Facsimile and First Class U. S. Mail this 14th day of September, 2007 to the following:

Adam Teitzman
Rick Mann
Keino Young
Lorena Holley
Staff Counsels
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
ateitzma@psc.state.fl.us
rmann@psc.state.fl.us
kyoung@psc.state.fl.us
lholley@psc.state.fl.us

Lee L. Willis
James D. Beasley
Ausley & McMullen
227 South Calhoun Street
Post Office Box 391 (32302)
Tallahassee, FL 32301
Tel. No. (850) 224-9115
Fax. No. (850) 222-7560
Represents Tampa Electric
lwillis@ausley.com
ibeasley@ausley.com

Paula K. Brown
Administrador, Regulatory Affairs
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601
Tel. No. (813) 228-1444
regdept@tecoenergy.com

Progress Energy Florida, Inc.
Mr. Paul Lewis, Jr.
106 East College Avenue
Suite 800
Tallahassee, FL 32301-7740
Tel. No. (850) 222-8738
Fax. No. (850) 222-9768
paul.lewisjr@pqnmail.com

Progress Energy Service Co., LLC
John T. Burnett
P.O. Box 14042
Saint Petersburg, FL 33733-4042
Tel. No. (727) 820-5587
Fax. No. (727) 820-5519
john.burnett@pqnmail.com

Maria T. Browne, Esq.
Davis, Wright, Tremaine, LLP
1919 Pennsylvania Avenue, N.W.
Suite 200
Washington, D.C. 20006
Tel. No. (202) 973-4281
Fax. No. (202) 973-4499
mariabrown@dwt.com

Beth Keating, Esq.
Akerman, Senterfitt
106 East Collage Ave., Suite 1200
Tallahassee, FL 32301
Tel. No. (850) 521-8002
Fax. No. (850) 222-0103
beth.keating@akerman.com

Beggs & Lane Law Firm
Jeffrey A. Stone
Russell A. Badders
Steven R. Griffin
P.O. Box 12950
Pensacola, FL 32591
Tel. No. (850) 432-2451
Fax. No. (850) 469-3331
Attys. for Gulf Power
jas@beggslane.com
rab@beggslane.com

Gulf Power Company
Ms. Susan D. Ritenour
One Energy Place
Pensacola, FL 32520-0780
Tel. No. (850) 444-6231
Fax. No. (850) 444-6026
sdritenour@southernco.com

Florida Power & Light
Mr. Bill Walter (*)
215 South Monroe Street
Suite 810
Tallahassee, FL 32301-1859
Tel. No. (850) 521-3900
Fax. No. (850) 521-3939

Florida Power & Light
John T. Butler
700 Universe Boulevard
Juno Beach, FL 33408-0420
Tel. No. (561) 304-5639
Fax. No. (561) 691-7135
john_butler@fpl.com

Robert Scheffel Wright
John T. LaVia, III
Young van Assendert, P.A.
225 South Adams Street, Suite 200
Tallahassee, FL 32301
Tel. No. (850) 222-7206
Fax. No. (850) 561-6834
swright@yvlaw.net
jlavia@yvlaw.net
Represents MUUC

Thomas G. Bradford
Deputy Town Manager
Town of Palm Beach
360 South County Road
Palm Beach, FL 33401
Tel. No. (561) 838-5410
Fax. No. (561) 838-5411
tbradford@townofpalmbeach.com

The Honorable Charles Falcone, Mayor
Post Office Box 7
Hobe Sound, FL 33475
Tel. No. (772) 545-0100
Fax. No. (772) 545-0188
cafalcone@adelphia.net

**City of Panama City Beach and
PCB Comm. Redevelop Agency**
Richard Jackson (*)
110 South Arnold Road
Panama City Beach, FL 32413
Tel. No. (850) 233-5100
Fax. No. (850) 233-5108

Harrison Law Firm
Douglas J. Sale
P. O. Drawer 1579
Panama City, FL 32402-1579
Tel. No. (850) 769-3434
Fax. No. (850) 769-6121
dsale@harrisonsale.com

Embarq Florida, Inc.
Susan S. Masterton
Mailstop: FLTLHO0102
1313 Blair Stone Rd.
Tallahassee, FL 32301
Tel. No. (850) 599-1560
Fax. No. (850) 878-0077
susan.masterton@embarq.com

Florida Cable Telecom. Assoc. (*)
246 E. 6th Avenue
Suite 100
Tallahassee, FL 32303
Tel. No. (850) 681-1990
Fax. No. (850) 681-9676

Verizon Florida LLC
Mr. David Christian
106 East College Avenue
Suite 710
Tallahassee, FL 32301-7721
Tel. No. (850) 224-3963
Fax. No. (850) 222-2912
david.christian@verizon.com

Verizon Florida LLC
Dulaney L. O'Roark III
Six Concourse Parkway, Suite 800
Atlanta, GA 30328
Tel. No. (770) 284-5498
Fax. No. (770) 284-5488
de.oroark@verizon.com


Jennifer S. Kay

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Tampa Electric Company. DOCKET NO. 070297-EI

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Progress Energy Florida, Inc. DOCKET NO. 070298-EI

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Gulf Power Company. DOCKET NO. 070299-EI

In re: Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Florida Power & Light Company. DOCKET NO. 070301-EI
Filed: September 14, 2007

AT&T FLORIDA'S PREHEARING STATEMENT

BellSouth Telecommunications, Inc. d/b/a AT&T Florida ("AT&T Florida"), in compliance with the Order Consolidating Dockets and Establishing Procedure (Order No. PSC-07-0573-PCO-EI) issued on July 10, 2007, hereby submits its Prehearing Statement for Docket Nos. 070297-EI, 070298-EI, 070299-EI and 070301-EI (the "Consolidated Dockets").

A. Witnesses

AT&T Florida proposes to call the following witness to offer testimony on the issues in the Consolidated Dockets:

Kirk Smith - AT&T Florida filed the Direct Testimony of Kirk Smith to explain the Process to Engage Third-Party Attachers (attached to the Testimony as Exhibit KS-1) and

its value. In an abundance of caution, to the extent the Process to Engage Third-Party Attachers is deemed relevant to any or all of Issues 1-52, AT&T Florida offers Kirk Smith's Testimony for those issues.

AT&T Florida reserves the right to call additional witnesses to respond to Florida Public Service Commission ("Commission") inquiries, to issues raised by Florida Power & Light Company ("FPL"), Gulf Power Company ("GULF"), Progress Energy Florida, Inc. ("PEF"), Tampa Electric Company ("TECO") (collectively referred to as the "IOUs") in their rebuttal testimony (which has not been filed), to issues not raised in AT&T Florida direct testimony, and to address issues not designated that may be designated by the Prehearing Officer at the prehearing conference to be held on September 21, 2007. Accordingly, AT&T Florida reserves the right to supplement and revise this list as appropriate.

B. Exhibits

- * KS-1 attached to Direct Testimony of Kirk Smith
Process to Engage Third-Party Attachers
- * AT&T Florida's responses to discovery issued by Staff and any other party, including, but not limited to, Municipal Underground Utilities Consortium's ("MUUC") First Set of Interrogatories and First Request for Production of Documents, and Staff's First Set of Interrogatories.
- * All responses filed by any party in response to discovery issued by Staff or any other party.
- * Staff's responses to discovery issued by any party.
- * All transcripts of any deposition that may take place prior to the discovery cut-off date.

AT&T Florida expressly reserves the right to file exhibits to any testimony that may be filed under the circumstances identified in Section "A" above. AT&T Florida expressly reserves the right to utilize any exhibits introduced by any party or Staff and

the right to introduce exhibits for cross-examination, impeachment, or any other purpose authorized by the applicable Florida Rules of Evidence and Rules of this Commission.

C. Statement of Basic Position

As a result of cooperative, good faith negotiations, AT&T Florida, TCG South Florida, Inc., Verizon Florida, LLC, Embarq Florida, Inc., Florida Cable Telecommunications Association and the IOUs have reached an agreement wherein these parties have committed that they will support the jointly developed terms and conditions contained in the Process to Engage Third-Party Attachers, a copy of which is attached to Kirk Smith's Direct Testimony as Exhibit KS-1.

In addition, based on AT&T Florida's review of the project details that the IOUs have included in their respective Storm Hardening Plans filed with the Commission on May 7, 2007 (the "Plans"), and with the agreement between the above-referenced parties to support the Process to Engage Third-Party Attachers, AT&T Florida has no objections to the IOUs' respective Plans at this time. AT&T Florida has filed testimony to explain the Process to Engage Third-Party Attachers and its value. AT&T Florida respectfully requests that the Commission approve the Process to Engage Third-Party Attachers in its Order in these Consolidated Dockets.

D. AT&T Florida's Position on the Issues

As previously stated, based on AT&T Florida's review of the project details that the IOUs have included in their respective Plans and with the agreement between the parties referenced in Section "C" above to support the Process to Engage Third-Party Attachers, AT&T Florida takes no position on Issues 1 through 52 at this time. AT&T Florida reserves the right to raise objections regarding an IOU's Plan as AT&T Florida

receives more detailed information about specific projects, as contemplated by Rule 25-06342(7) and the Process to Engage Third-Party Attachers.

**E. AT&T Florida's Notice of Intent
to Use Confidential Information at Hearing**

As of the date of this filing, AT&T Florida has no plans to use confidential information at the hearing. To the extent that AT&T Florida provides confidential information in responses to discovery requests not yet filed, AT&T Florida will file a supplement to this Joint Prehearing Statement to identify such information. AT&T Florida reserves the right to use any such information at hearing, subject to appropriate measures to protect its confidentiality.

F. Stipulations

As indicated in Section "C" above, AT&T Florida, TCG South Florida, Inc., Verizon Florida, LLC, Embarq Florida, Inc., Florida Cable Telecommunications Association and the IOUs have reached an agreement wherein these parties have committed that they will support the jointly developed terms and conditions contained in the Process to Engage Third-Party Attachers. On Friday, September 7, 2007, counsel for AT&T Florida sent an email to the remaining parties of record, asking them to respond as to whether they had any objections to the Process to Engage Third-Party Attachers by Wednesday, September 12, 2007. To date, AT&T Florida has not received comments or objections from the remaining parties of record. AT&T Florida will contact these parties to determine if consensus on the Process to Engage Third-Party Attachers can be reached prior to the prehearing conference scheduled for September 21, 2007.

G. Pending Motions

AT&T Florida is not aware of any pending motions in this proceeding.

H. Objections to Witness Qualifications

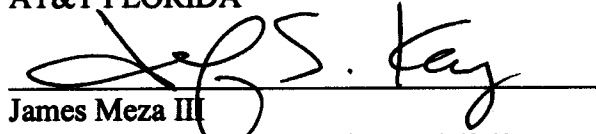
AT&T Florida is unable to address witness qualifications at this time, since no party has designated a witness as an expert. AT&T Florida expressly reserves the right to object to a witness' qualifications should a party or Staff designate a witness as an expert.

I. Other Requirements

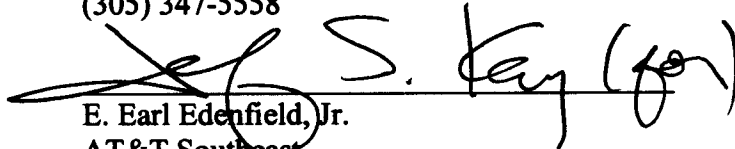
AT&T Florida does not know of any requirement of the Order Establishing Procedure with which it cannot comply.

Respectfully submitted this 14th day of September, 2007.

AT&T FLORIDA



James Meza III
Authorized House Counsel No. 426260
Jennifer S. Kay
Tracy W. Hatch
c/o Gregory R. Follensbee
150 South Monroe Street
Suite 400
Tallahassee, Florida 32301
(305) 347-5558



E. Earl Edenfield, Jr.
AT&T Southeast
675 West Peachtree Street, Suite 4300
Atlanta, Georgia
(404) 335-0763