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Public Service Commission

March 28, 2019

Mr. C. Shane Boyett
One Energy Place
Pensacola, FL 32520-0780
Charles.Boyett@nexteraenergy.com

STAFF'S THIRD DATA REQUEST

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

Dear Mr. Boyett,

By this letter, the Commission staff requests that Gulf Power Company (Gulf or Utility) provide responses to the following data requests.

Please refer to Gulf's storm hardening plan that was filed in Docket No. 20180147-EI.

National Electrical Safety Code (NESC) Compliance

- 1) Please refer to page 18.
 - a. What NESC construction grade does Gulf use for its distribution and transmission facilities?
 - b. Does Gulf use the same NESC construction grade for new construction as it does for replacement?
 - c. Why does Gulf use the American Society of Civil Engineers 7 extreme wind loading criteria instead of the 2017 National Electrical Safety Code as required by Rule 25-6.0345, F.A.C.?
 - d. Does Gulf use any software to design its distribution and transmission supporting structures? If yes.
 - i. Does the software comply with the 2017 NESC?
 - ii. Does the software's operator need to know the 2017 NESC code to enter the correct information into the software? Example: Enter the Basic Wind Speed as specified by Figure 250-2 of the 2017 NESC into the software.

iii. What is the name and version of the software?

- 2) Is Gulf applying any safety (load or strength) factor to exceed the NESC minimum requirements?

Extreme Wind Loading (EWL) Standards

3) Please refer to page 18.

- a. Does Gulf design and construct its facilities in compliance with Rule 250C of the 2017 NESC?
- b. For the projects associated with strengthening existing critical infrastructure facilities to extreme wind loading standards per NESC guidelines, has Gulf selected which NESC construction grade will be used for these projects?

Mitigation to Flooding and Storm Surge Damage

4) Please refer to page 19.

- a. Has Gulf 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?
- b. Has Gulf 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 Gulf learned any lessons from previous underground projects? If yes, please explain the lessons learned.
- d. Does Gulf consider the terrain's characteristics, soil consistency, historical data and FEMA flooding maps when selecting the Storm hardening underground project selection? Please explain.

Deployment Strategies

- 5) Please refer to page 20. Is Gulf discontinuing its "Wind Monitors" as that were discussed in Gulf's 2016-2018 storm hardening plan but not in the 2019-2021 plan?
- 6) Please refer to pages 20 through 21. Please provide a list of proposed storm hardening projects that Gulf is planning for 2019. Include the type of project and city/county where the project will be located.
- 7) Please refer to page 22. Please clarify the statement about replacing wooden transmission structure with concrete and steel. Is the initiative in the 2016-2018 plan, concerning replacing wooden cross arms with steel cross arms complete or it is part of the new initiative of replacing the whole transmission structure?

- 8) Please refer to Appendix 4. The actual amount for 2016, 2017, and 2018, average \$26,269,431 per year while the range of the estimate costs for 2019, 2020, 2021 are \$56M to \$95M. Please explain the increase in costs for Gulf's 2019-2021 storm hardening plan compared to its 2016-2018 plan.

Ten Initiatives

- 9) Please refer to page 9: Vegetation Management. Gulf stated that the pilot program of purchasing vegetation management easements has "met expectations to this point."

- a. What are Gulf's expectations for the pilot program?
- b. How has Gulf determined that the expectations for the pilot program have been met so far?
- c. How many additional miles, if any, of easements is Gulf considering purchasing?

- 10) Please refer to page 11: Storm Hardening Activities for Transmission Structures.

- d. Please identify the total number of wooden structures that are a part of Gulf's transmission system.
- e. Please complete the following table based on the Gulf's program to replace all wooden structures with concrete or steel.

Year	Estimated Number of Wooden Structures to be Replaced
2019	
2020	
2021	

- 11) Please refer to page 12: Geographic Information System (GIS).

- a. When will the transition of Gulf's GIS data to the systems utilized by NextEra Energy begin?
- f. When will the full transition be completed?

- 12) 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 Gulf Power Company
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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,



Jennifer Crawford, Esq.
Office of the General Counsel

JSC/lms

cc: Office of Commission Clerk