

Gulf's Response to OPC's Second Set of
Interrogatories Nos. 33-37, 38 redacted, 39-40,
41 redacted (Docket No. 20210179-EI)

Gulf Power Company
Docket No. 20210179-EI
OPC's Second Set of Interrogatories
Interrogatory No. 33
Page 1 of 1

QUESTION:

Zeta - Mutual Assistance.

Please refer to the response to OPC's Request for Production of Documents (POD) No. 9 that indicated there were no responsive invoice copies for mutual assistance companies related to Hurricane Zeta. Explain all reasons why there were no mutual assistance company costs incurred related to Hurricane Zeta. In other words, explain why there were no mutual assistance companies involved in recovery efforts

RESPONSE:

Hurricane Zeta did not impact the Gulf Power service area to the same extent as Hurricane Sally did a few weeks prior. The Company acquired an appropriate level of non-mutual aid external resources that were able to restore service to customers in less than 24 hours.

QUESTION:

Zeta - Preparedness Plan.

Please refer to the Company's response to OPC's First Request for POD No. 11 and the link to Annual Status Report for 2020 filed by FPL, and specifically to Appendix D of the FPL Report entitled Emergency Preparedness Plan. Please answer the following:

- a. Confirm that the FPL Emergency Preparedness Plan is now applicable to Gulf Power Company, including the organization structure and responsibilities for emergency preparedness and response described in this Appendix D. Provide the date when FPL extended the Emergency Preparedness Plan to Gulf Power Company.
- b. Describe which organization entities, such as the FPL Command Center, specifically the Planning Section, and the Area Command Resource Unit, determine the resource requirements from the initiation of the storm response throughout the pre-storm landfall, and then in response to actual damage assessments, including whether more or fewer resources are required as the storm progresses, makes landfall, and then moves out or diminishes.
- c. Provide a description of all decision criteria and how they are applied to the resource decisions as the storm progresses, including the need for more or fewer resources.
- d. Describe in detail how the Company balances the need for resources with the cost of those resources, including all decision criteria and how they are applied to the resource decisions.

RESPONSE:

- a) Confirmed. FPL's Emergency Preparedness Plan, including the organization structure and responsibilities for emergency preparedness is now applicable to the former Gulf Power service area. The process for extending the FPL Emergency Preparedness Plan to the former Gulf Power service area began in January of 2019 when the former Gulf Power was acquired by NextEra Energy. During the 2019 – 2021 period Gulf Power operated as a separate ratemaking utility but transitioned to many of the FPL emergency preparedness processes to gain efficiencies of operating as a consolidated company.
- b) The Resource Allocation team which reports to the Planning Section Chief provides the initial resource estimates based on the initial damage forecasts from the Storm Damage Model. The Planning Section Chief then submits this recommendation to the Area Commander for review and approval. Post impact analysis is performed based on the patrols and review of damage caused by the storm. Based on this analysis, resource estimates are updated to reflect actual workload. The Resource Allocation team then provides a revised resource estimate to the Area Commander for review and approval.

- c) Gulf does not have a defined “decision criteria” that can be applied consistently during each restoration event. Each storm is different, and each storm produces a variety of challenges and obstacles that must be accounted for during restoration. Please see Gulf Witness Spoor’s direct testimony, pages 10-11, which describes Gulf’s responses when a hurricane threatens its service area. In summary, resource decisions are based on the Construction Man Hours (CMH) damage forecast from the Storm Damage Model, information from historical events, experience, on-system resource, and the availability and location of external resources.
- d) As described at page 5 of Gulf Witness Spoor’s direct testimony “The primary objective of Gulf’s emergency preparedness plan and restoration process is to safely restore critical infrastructure and to restore power to the greatest number of customers in the least amount of time so that Gulf can return normalcy to the communities it serves.” Please see page 15 of Gulf Witness Spoor’s direct testimony regarding how Gulf takes costs into account when acquiring resources for storm restoration. In summary, the company’s process for balancing the need for resources and the cost of those resources starts well before storm season every begins. FPL negotiates storm contracts with as many vendors as possible to not only create a competitive cost environment but also to limit the need to negotiate pricing during an event. Resource decisions are based on the number of resources needed, resource availability and location, and expected travel duration. Resources available are then ranked based on contractual rate and ability to reach the impacted area and provide sufficient assistance.

**Gulf Power Company
Docket No. 20210179-EI
OPC's Second Set of Interrogatories
Interrogatory No. 35
Page 1 of 1**

QUESTION:

Zeta - Preparedness Plan.

Please indicate whether the Company had an optimized target service restoration time that was used to determine resource requirements for Hurricane Zeta. If so, explain.

RESPONSE:

Please see Gulf's response to OPC's Second Set of Interrogatories No. 36. Target service restoration time or estimated restoration time is not used to determine resource requirements. Resource availability is one of the primary drivers in determining an achievable service restoration time.

QUESTION:

Zeta - Preparedness Plan.

When the final resource requirements were determined for Hurricane Zeta just prior to landfall, indicate the level of customer outages that was estimated by the Company's models and the estimated time of service restoration that might be required if the projected resource requirements were utilized.

RESPONSE:

FPL estimates the amount of damage and resources required based on construction man-hours (CMH) not customer outages. Based on the estimated CMH hours and the resources acquired the estimated time for system restoration was 1 day for Hurricane Zeta. As explained at page 10 of Gulf Witness Spoor's testimony, resource requirement decisions begin 72-96 hours in advance of landfall to ensure that necessary resources are available. Adjustments (increase or decrease) of the required resources are continually evaluated as more information is available related to forecast track, storm intensity, and resource availability.

**Gulf Power Company
Docket No. 20210179-EI
OPC's Second Set of Interrogatories
Interrogatory No. 37
Page 1 of 1**

QUESTION:

Zeta - Preparedness Plan.

Please indicate whether the Company utilizes a resource determination model for service restoration that is separate from the FPL storm damage model. If so, explain how that model works and indicate whether it is tied to or synchronized with the FPL storm damage model.

RESPONSE:

Gulf Power did not utilize a "resource determination model." Gulf utilized FPL's Storm Damage Model during the 2020 storm season.

QUESTION:

Zeta - Contractor Costs.

Please refer to the response to OPC's Interrogatory No. 9 subpart a. which states, "The costs associated with the contractors identified in this interrogatory are not related to line crews or vegetation management crews as that term is used in the FPL Hurricane Irma Settlement Agreement." For each of the contractors and amounts listed in OPC's Interrogatory No. 9, define the types of costs that were incurred and explain why they were not related to line crews or vegetation management crews as that term is used in the FPL Hurricane Irma Settlement Agreement. In addition, if underground crews are not classified as line crews as part of the Company's interpretation, explain why not.

RESPONSE:

Each of the contractors and amounts listed in the OPC's Interrogatory No. 9 (a) is included below. The third column explains the "Contractor type".

Contractor	Cost Amount	Contractor Type
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

The information in the table shows that the contractors in question provided services including emergency first responders and underground restoration, and post storm vegetation services. Because underground crews provide a range of services including emergency response, restoration of underground facilities, supporting Emergency Operation Centers (EOCs), and switching for overhead facilities, they do not fall within FPL's traditional use of the term "line crews" which FPL generally uses to refer to line crews engaged in overhead line work. These services are separate from the work provided by overhead line crews and vegetation management crews that perform the great majority of restoration work following a storm event. In this proceeding, Gulf provided the data exported from the iStormed App for overhead line and vegetation management contractors (i.e., the flat files) on November 12, 2021. As described in paragraph 19 of the FPL Hurricane Irma Settlement Agreement, the early provision of these flat files was "intended to reduce the amount of discovery in future storm proceedings"; in short, OPC did not need to ask for or wait to receive the support for costs related to overhead line crews and vegetation management crews. Additionally, with respect to other vendors and contractors whose costs are the subject of this proceeding, Gulf has also provided additional cost support workpapers, contracts, and invoice support in response to previous discovery responses.

QUESTION:

Zeta - Contractor Costs.

Please refer to the Confidential Excel flat file for [REDACTED] provided as part of the Company's November 12, 2021 filing. Refer further to the "Expenses" worksheet tab at cell row 35, which contains an expense amount of [REDACTED] described in cell column AJ as "equipment necessary for work." Describe the equipment costs charged to the Company and explain why it was charged as part of the recovery costs.

RESPONSE:

The amount charged is for equipment that is necessary and used by the specific vegetation crews. The use of equipment and the right to be reimbursed for the use of that equipment are allowed as a part of their contract, provided it has been specifically pre-authorized by FPL. In this case, the equipment was pre-authorized to be used as a part of the storm restoration effort. The Cost Finalization team verifies that these equipment were used during storm restoration and appropriate rates were charged per their contract.

Please refer to FPL's response to OPC's Production of Document Request No. 38 for details of the allowable equipment per their contract.

QUESTION:

Zeta - Contractor Costs.

Refer to the Confidential invoice detail provided for the invoice from Wilco Electrical LLC provided in response to OPC's Request for POD No. 6 and associated with accounts payable reference number 5100092021 (Bates No. Gulf 002671). The invoice for these underground crews indicates the following Product IDs and descriptions for regular hours:

Product ID 8476 SW Qualified
Product ID 8480 Non-SW Qualified

- a. Define the acronym SW and explain the distinctions between SW Qualified and Non-SW Qualified.
- b. Explain why underground crews such as these were mobilized for potential Hurricane Zeta restoration and describe generally the work performed.

RESPONSE:

- a. "SW Qualified" refers to Switch Qualified, which means the crews have the qualifications and ability to "switch" (open and close) electrical devices on the grid. Switch Qualified crews have the potential to make areas safe by opening a device, and also to energize or restore service to customers by closing a device, both critical during the restoration process. "Non-SW Qualified" or Non-Switch Qualified crews do not have the ability to switch on the electric grid but based on their experience and skill set they are qualified to perform other restoration functions including repairs to equipment and the system, and damage assessment.
- b. Underground crews, which are also used to perform Switch Qualified work, are always mobilized during a restoration event. These crews have the experience, qualifications, and the ability to assist with the types of restoration activities described in FPL's response to OPC's Interrogatories No. 43(a) above. As described in part a of this question, these underground crews assist with overhead restoration activities including switching, thereby allowing overhead crews to remain productive with major overhead restoration activities. Underground crews are also required during restoration to inspect, repair, replace, and restore service to underground areas that have the potential to be impacted by uprooted trees and possible flooding due to heavy rains and/or storm surge.

QUESTION:

Zeta - Mobilization/Demobilization.

Refer to the Confidential Excel flat files provided as part of the Company's November 12, 2021 filing. The vast majority of the contractors charged mobilization hours over the course of portions of three days, charged on-site hours over the course of portions of two days, and then charged no demobilization hours. Describe all reasons why there were virtually no demobilization charges related to Hurricane Zeta and describe the terms of all agreements made with other utilities more heavily impacted from the storm to pass along the responsibility for demobilization of these crews. In addition, identify all other utilities upon which such agreements were made.

RESPONSE:

Once restoration efforts associated with Hurricane Zeta were complete, external resources were released to other utilities as soon as possible to reduce cost. External resources acquired by Gulf were able to assist in the completion of service restoration in less than 24 hours. [REDACTED]

[REDACTED]