

Gulf's Response to OPC's First Request for  
Production of Documents Nos. 2-5, 7, 10-11,  
14, 16-18, 20, 21, 28-31  
(Docket No. 20210179-EI)

(Including Attachments)

**QUESTION:**

Zeta - Travel Log.

Provide example copies of correspondence with potential mutual assistance companies which indicate the need or lack of need for their services related to Hurricane Zeta.

**RESPONSE:**

Communication with the mutual assistance companies primarily occurs via phone calls facilitated by the Southeastern Electric Exchange. Gulf has conducted a search for follow-up e-mails, if any, but has not identified any such e-mails (if any) that may have been retained.

**QUESTION:**

**Zeta - Cost Support Workpapers.**

Refer to the summary cost support Excel file included with the Confidential files attached to the November 12, 2021 petition for Hurricane Zeta storm cost recovery entitled "DH-1 Zeta 10.2021." Provide copies of all workpapers used to support calculations in each of the worksheet tabs not already included in this Excel file in electronic format with all formulas in place. (e.g. workpapers detailing the calculation of capitalized costs depicted in worksheet tab 2(a) and copies of general ledger details related to prior year and 2020 costs utilized in the ICCA calculations.)

**RESPONSE:**

See the attached worksheet "Capital Labor Calc – Zeta" as support for the split between Distribution contractor and regular payroll on tab 2(a) of "DH-1 Zeta 10.2021". See the attached worksheet "POD 3 SALLY-ZETA ICCA Veg Act - Oct 2020" as support for the allocation of October 2020 vegetation management costs between Hurricanes Sally and Zeta on Tab 3(b) of Confidential file "DH-1 Zeta 10.2021." In all other instances the documents which support the calculations in "DH-1 Zeta 10.2021" have already been included within the "DH-1 Zeta 10.2021" file that was provided with Gulf's initial filing on November 12, 2021.

QUESTION:

Zeta - Contracts.

Provide a copy of all contracts between Gulf Power Company and each contractor (line, line clearing, other), other utilities, and/or other vendors, including applicable rate sheets and vendor statement of work, related to Gulf Power Company's response to Hurricane Zeta and/or the related restoration work in a searchable and unlocked format.

RESPONSE:

Please see confidential attachments.

**QUESTION:**

Zeta - Invoice Support.

Provide a copy of all invoices over \$10,000 for each contractor (line, line clearing, and other), other utilities, and/or other vendors (for both capitalized and expensed costs) related to Gulf Power Company's response to Hurricane Zeta and/or the related restoration work for which recovery is requested other than those related to the Excel flat files provided with the filing. Please provide this in searchable format.

**RESPONSE:**

Please see confidential attachments.

**QUESTION:**

Zeta - Employee Expenses.

Provide a copy of all expense reports or invoices and supporting documentation for reimbursement of employee expenses that individually exceed \$1,000 related to Gulf Power Company's response to Hurricane Zeta and/or the related restoration work for which recovery is requested in a searchable and unlocked format.

**RESPONSE:**

Please see confidential document attached.

QUESTION:

Zeta - Preparedness Plan.

Refer to the Direct Testimony of Mr. Spoor starting at 5 related to Gulf Power Company's "emergency preparedness plan and restoration process." Provide copies of all policies and procedures and other "key components of the plan" related to the "emergency preparedness plan and restoration process."

RESPONSE:

Please refer to Gulf's Annual Status Report on Storm Protection Plan Programs and Projects (specifically Section M – Disaster Preparedness and Recovery Plan and Section N – Storm Season Readiness) which can be accessed on the FPSC website- <http://www.psc.state.fl.us/ElectricNaturalGas/StormProtectionPlans>.

Gulf also presents annually at the FPSC Hurricane Preparedness Workshop. These presentations can be accessed on the FPSC website <http://www.psc.state.fl.us/ElectricNaturalGas/HurricanePreparationWorkshops>

FPL's emergency preparedness plan was applicable to Gulf during the 2020 hurricane storm season, as Gulf transitioned to the FPL restoration process and procedures. Please also see responsive document "Emergency Management Plan Severe Weather Brief" included with the response.

**QUESTION:**

Zeta - Preparedness Plan.

Refer to the Direct Testimony of Mr. Spoor starting at 13 related to Gulf Power Company's utilization of "FPL's storm damage model to forecast system damage and hours of work required to restore service." Provide copies of all policies and procedures related to this model, a detailed description of all key inputs into the model, and a description of how the model changes to account for increases in storm hardening activities.

**RESPONSE:**

FPL's Storm Damage Model and associated algorithms are propriety trade secrets that are the subject of a pending patent. The model combines wind and in-service asset data to produce damage result information. The wind data is based on the National Hurricane Center (NHC) forecast track and intensity, while the in-service asset data is provided by FPL's Asset Management System (AMS) and includes infrastructure improvements from storm hardening. The model uses multiple Monte Carlo simulation runs to estimate damage based on the all available information about the infrastructure. The model incorporates data regarding vegetation, pole loading, soil conditions, and storm surge. The algorithms used in FPL's Storm Damage Model are tested, updated, and verified twice a year. Please also see responsive document included with the response.



**QUESTION:**

Zeta - Incremental Costs and Capitalized Costs.

Refer to the Direct Testimony of Mr. Hughes at 12. Provide a copy of all accounting policies and procedures, including, but not limited to, all specific storm accounting policies and procedures, if any, that address Gulf Power Company's use of "a blended simple average internal employee and contractor hourly rate, under non-storm conditions, in its calculation of capital costs for Hurricane Zeta."

**RESPONSE:**

Gulf's use of "a blended simple average internal employee and contractor hourly rate, under non-storm conditions, in its calculation of capital costs for Hurricane Zeta" is consistent with FPL's Hurricane Irma Stipulation and Settlement Agreement approved by the Commission on August 1, 2019, Order No. PSC-2019-0319-S-EI, Docket No. 20180049-EI. The specific provision requiring the use of this methodology is contained in paragraph 20 of the Stipulation and Settlement Agreement. While Gulf was not required to implement provisions of the Commission-approved Hurricane Michael Settlement Agreement approved by the Commission in Order No. PSC-2020-0349-S-EI issued on October 8, 2020, Docket No. 20190038-EI until the 2021 hurricane season, Gulf voluntarily chose to follow the incremental cost methodology of capitalized costs agreed to by the parties to the FPL Hurricane Irma Stipulation and Settlement.

QUESTION:

Zeta - Mobilization/Demobilization.

Please provide all receipts to accompany travel logs for fuel, lodging, meals, etc., during mobilization and demobilization in searchable and unlocked format. (note: this is for invoices exceeding \$10,000.) If receipts are unable to be provided, please explain why.

RESPONSE:

FPL has filed an objection to OPC's First Request for Production of Documents Request No. 16.

**QUESTION:**

Zeta - Mobilization/Demobilization.

Provide a copy of all documentation that details each of the service territories into which crews were mobilized and the service territories in which Hurricane Zeta damage occurred, including dates of all damages.

**RESPONSE:**

Please see the attached file showing the outages by county on October 29, 2020. Further and simply for clarification, Gulf interprets the phrase "service territories" to mean Gulf's management areas throughout its service area. That said, Gulf's response provides information at the more detailed county level, rather than by management area.

**QUESTION:**

Mobilization/Demobilization.

Provide a copy of all documentation that details each of the service territories into which crews were mobilized that did not sustain damages from Hurricane Zeta.

**RESPONSE:**

Gulf has no responsive documents. Further, and simply for clarification, Gulf interprets the phrase "service territories" to mean Gulf's management areas throughout its service area.

**QUESTION:**

Zeta - Standby.

Provide a copy of all documents related to any analysis performed by, on behalf of, or at the direction of the Company that identifies the amount of standby time billed and the amount of standby time paid, and that supports the fact that such costs were reasonable related to Gulf Power Company's response to Hurricane Zeta and/or the related restoration work for which recovery is requested.

**RESPONSE:**

Please see Confidential Vendor Flat File(s) provided with the Notice of Filing submitted on November 12, 2021.

QUESTION:

Zeta - Standby.

Provide Gulf Power Company's listing of current service territories served in Florida in October 2020 as well as a map of those service territories on a state of Florida map.

RESPONSE:

FPL's map of its service area is included in its tariff book (Sheet No. 3.020), which is also attached with this response. The counties in the northwest of the Florida are the counties service by Gulf Power in September 2020.

**QUESTION:**

Zeta - Embedded Line Contractors.

For the amount of annual expense associated with embedded line contractors providing day-to-day service that was included in base rates in effect during 2020, provide a copy of the source of this expense amount, e.g., rate filing schedule and/or workpapers in searchable and unlocked format.

**RESPONSE:**

Refer to Gulf's 2017 Rate Case Settlement Agreement, Order No. PSC-17-0178-S-EI, approved by the Commission on May 16, 2017 in Docket No. 160186-EI.

**QUESTION:**

Zeta - Materials and Supplies.

For the amount of annual expense associated with materials and supplies that was included in base rates in effect during 2020, provide a copy of the source of this expense amount, e.g., rate filing schedule and/or workpapers in searchable and unlocked format.

**RESPONSE:**

Please see Gulf's response to OPC's First Request for Production of Documents No. 28.



QUESTION:

Zeta - Line Contractors.

Refer to the Confidential Excel flat files pertaining to all line contractors provided as part of the Company's filing. Refer further to the hourly rates for each employee that were standard for each employee and not differentiated by position:

- a. Provide copies of examples of correspondence between Gulf Power Company and the contractors in regards to this procedure to charge one rate for all contractor employee positions/level of expertise and that describe how the rates per hour were to be determined in searchable format.

RESPONSE:

In accordance with Gulf's answer to OPC's Interrogatory No. 10, see Gulf's Response to OPC's Request for Production of Documents No. 15 for Request for Proposal Letters for both Vegetation Management and Overhead Storm Restoration Work.

QUESTION:

Zeta - Contractor Rates.

For any differences in contractor rates (line contractors and/or vegetation management contractors) that depend on whether the contractor is performing embedded and/or day-to-day services or performing storm restoration services and/or that depend on the type of storm restoration services, e.g., the intensity of the storm, provide a copy of those contracts in searchable format.

RESPONSE:

None, there are no differences in contractor rates (line contractors and/or vegetation management contractors) that depend on the type or extent of the storm restoration services, e.g., the intensity of the storm.

Embedded contractor rates are based on unit rates for day to day services. Storm support is based on man hour rates which includes mobilization and demobilization.