

Gulf's Response to OPC's Second Request for
Production of Documents Nos. 8, 15, 17-18, 24,
28, 35-38 (Docket No. 20200241-EI)

(Including Attachments)

QUESTION:

Sally - 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 Sally.

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:

Sally - Mutual Assistance.

Refer to the summary cost support Excel file included with the Confidential files attached to the November 12, 2021 petition for Hurricane Sally storm cost recovery entitled "DH-1 Sally 10.2021 Rev3." Provide a list of all invoices for each mutual assistance company for which storm recovery costs were included. In addition, cite to the worksheet tab(s) included in the Excel file that details this information.

RESPONSE:

List of all invoices for each mutual assistance company utilized is provided below. Mutual assistance costs are included on the Contractor line item, line 4 of Exhibit DH-1(Sally). See tab 1(c) of "DH-1 Sally 10.2021 Rev3" for the details. Note, the below invoices were non-PO invoices and not identifiable by vendor name on tab 1(c). The document reference numbers are included below to facilitate identification of the costs on the GL detail tab of the excel workbooks referenced above.

Sally (Gulf)

- AEP (Ohio Power) multiple invoices
 - Document Reference No: 1900019330
 - Document Reference No: 1900019360
 - Document Reference No: 1900019368
- CenterPoint - Document Reference No: 1900018276
- Duke Energy- multiple invoices
 - Document Reference No: 1900019260
 - Document Reference No: 1900019282
 - Document Reference No: 1900019259
 - Document Reference No: 1900019283
- Oncor - Document Reference No: 1900018097

QUESTION:

Sally - 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:

Sally - 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:

Sally - 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 Sally damage occurred, including dates of all damages.

RESPONSE:

Please see the attached file showing the outages by county on September 22, 2020. Further and simply for clarification, Gulf interprets the phrase "service territories" to mean Gulf's management areas throughout its service territory. That said, Gulf's response provides information at the more detailed county level, rather than by management area.

QUESTION:

Sally - Standby.

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

RESPONSE:

A map of FPL's service area is included in the Company's approved tariff book (Sheet No. 3.020), a copy of which is provided with this response. The highlighted counties in northwest Florida (from Escambia County extending east to Bay and Jackson Counties) are the counties that contain customers served by Gulf Power in September 2020.

QUESTION:

Sally - 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:

Sally - 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 Second Request for Production of Documents No. 35.

QUESTION:

Sally - 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 response to OPC's First Interrogatory No. 10, see Gulf's Response to OPC's Request for Production of Documents No. 22 for Request for Proposal Letters for both Vegetation Management and Overhead Storm Restoration Work.

QUESTION:

Sally - 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.