

Gulf's Response to OPC's Second Request for
Production of Documents Nos. 36-37, 38
redacted, 39, 45 redacted, 46
(Docket No. 20210179-EI)

(Including Attachments)

QUESTION:

Zeta - Contractor Rates.

Please refer to the Confidential Hurricane Zeta Excel contractor flat files identified below and further to the hourly rates paid for each labor-related product ID found on the "Timesheets" worksheet tab. Refer also to the contract prices for the same labor-related product IDs depicted in the corresponding contracts for each vendor as provided in the response to OPC's First Request for Production of Documents (POD) Request No. 4. The labor rates billed by the contractors do not appear to match the contract rates in the contract copies provided. Provide copies of the correct contracts for which contract labor rates correspond to the labor rates billed.

Pike Electric LLC Contract 4600020921

Utility Lines Construction Services Contract 4600020861

RESPONSE:

Please See responsive documents for correct contract rates for 2020 for which contractor labor rates correspond to the labor rates billed in the flat files for Pike Electric LLC (Contract #4600020921) and Utility Lines Construction Services (Contract #4600020861).

The previously provided Flat Files contain the correct rates that were applicable to the work performed by overhead line and vegetation management contractors during the 2020 storm season. The rates included in the flat files were the rates used to pay contractors that provided storm-related assistance in 2020, and payments made at those rates were included in Gulf's compilation of storm related costs.

Providing vendor contracts in response to discovery requests requires the Company to engage in a manual and time-consuming process. The FPL overhead line and vegetation management storm contracts are maintained as "Condition Records". This allows the Company to set up multi-year agreements without having to go in each year to manually change the labor rates. The system automatically changes the rate to the date of the condition record for the appropriate year. In 2021, when FPL pulled all of the individual contracts in anticipation of discovery in these proceedings, the system automatically pulled the then-current (i.e., 2021) contract rates, versus the 2020 contract rates.

QUESTION:

Zeta - Contractor Rates.

Please provide a list of all Product IDs utilized to invoice all storm restoration and follow-up activities that includes a description of each.

RESPONSE:

Please see attachment titled "ZETA PRODUCT IDs AND DESCRIPTIONS".

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." Provide copies of all documentation related to this additional equipment charge.

RESPONSE:

Please see responsive document(s) for the approved equipment costs.

QUESTION:

Zeta - Preparedness Plan.

Refer to the Company's response to OPC's First Request for POD No.11, which addresses FPL's storm damage model. Please provide the following with regards to the storm damage model:

- a. Provide a copy of the user manual, if there is one.
- b. Provide a copy of all model documentation regarding the process (scope and timing) of updates, especially to incorporate the effects of the Company's SPP programs and projects, including, but not limited to, hardening activities, such as undergrounding and pole replacements, and vegetation management.
- c. Provide a copy of all model documentation regarding the inputs that could affect the potential damage determined by the model.
- d. Provide a copy of the documentation filed with the US Patent Office.
- e. Provide a copy of all model documentation regarding the outputs that address the magnitude and types of resources required to repair damage and restore service.

RESPONSE:

- a. No responsive documents.
- b. Please see Gulf's response to OPC's First Request for Production to Documents No. 11. Gulf's in-service asset data which includes the completed storm hardening activities, undergrounding, and pole replacement is uploaded to the Storm Damage Model at the beginning of every storm season. The model also considers the Vegetation Management performed by Gulf as well as the vegetation density data for the Gulf service area.
- c. Please see Gulf's response to OPC's First Request for Production to Documents No. 11 and subpart (d) of this response.
- d. Please see responsive documents included with this response.
- e. Please see FPL's response to OPC's First Request for Production to Documents No. 11 and subpart (d) of this response.

Zeta - Mobilization/Demobilization.

RESPONSE:

[REDACTED] FPL, as a SEE member, is a party to a nondisclosure agreement restricting FPL from producing the agreement.

However, as noted above, Gulf's Emergency Restoration Statement of Work similarly provides for the transfer of demobilization costs and expenses to the receiving utility.

Gulf Power Company
Docket No. 20210179-EI
OPC's Second Request For Production of Documents
Request No. 46
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QUESTION:

Zeta - Mobilization/Demobilization.

Please refer to the attachment provided in OPC's First Request for POD No. 17, which depicted the Hurricane Zeta outages by county on October 29, 2020 for the "7PM EDT Release." Provide copies of all other available summaries of outages in similar format by county for all release times on each day October 28, 2020 through October 30, 2020. If none, so state.

RESPONSE:

The State Emergency Operations Center/Florida Department of Emergency Management requires all electric utilities to report outages by county during a declared state of emergency. The reports are required at 6 am, 9 am, 12 noon, 3 pm, 6 pm and 9 pm. These reports are typically available on the PSC website at: <http://www.psc.state.fl.us/Home/HurricaneReport>

However, in the case of Zeta, the State Emergency Operations Center did not require these updates. Despite this, Gulf created similar reports which have been included with this response.