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FPUC's Response to OPC's Fifth Set of  
Interrogatories Nos. 47-50

**(Nos. 47 and 49 have attachments)**

Interrogatory No. 47

**INTERROGATORIES**

47. Please provide a spreadsheet containing the following for the years 2016 through 2021:
- a. the name of each tropical storm or hurricane which was either forecast to hit or hit your service area for which you incurred costs eligible for charging to your storm reserve,
  - b. the total expensed cost for each individual storm, by storm, and
  - c. the highest total number of customer outages for each individual storm, by storm.

**Company Response:** Please see attached Exhibit “PMC-60”. [To be updated at a later date with information responsive to subpart (a).]

*Respondent: Mark Cutshaw*

Interrogatory No. 48

48. Please state whether Pike Engineering, or any affiliate of Pike engineering, will be, or will be eligible to be, selected to perform any of the work identified in the SPP it has submitted for commission approval.

**Company Response:**

Pike Electric will be eligible to provide quotes for construction of our SPP Projects along with other qualified contractors through our competitive bidding process. The low cost evaluated bidder will be awarded the project work.

*Respondent: Mark Cutshaw*

Interrogatory No. 49

49. On page 26 of the SPP in the last paragraph you state that “post-storm data for Hurricane Michael found that hardened structures performed significantly better than non-hardened structures.” Please identify all documents that discuss, describe, or analyze this post-storm data and the associated findings described here.

**Company Response:**

Please see Exhibit “PMC-50” which is a summary document for the forensic inspections that took place during Hurricane Michael. This shows the results of a forensics inspection that included 88 poles that were broken during Hurricane Michael. The results indicated of the random sample of 88 broken poles, only 2 (2.27%) were considered storm hardened poles.

The broken poles resulted from trees, wind, debris or a cascading effect from adjacent broken poles. Although any pole can be damaged under certain extreme weather conditions, such as Hurricane Michael, hardened structures perform significantly better than non-hardened structures.

*Respondent: Mark Cutshaw*

Interrogatory No. 50

50. Please explain the SPP-related rationale for the sixth bullet point item on page 27 of your SPP that reads “Environmental upgrades such as avian protection, animal mitigation, and lightning protection.”

**Company Response:**

Avian protection involves tactics such as the installation of deterrents to discourage the building of nests atop FPUC facilities that may otherwise be blown into the energized components of these facilities during extreme weather events and cause an unnecessary power outage. Additionally, the protective covers installed provide additional protection from small flying debris and contamination associated with such weather events. These tactics yield outage prevention benefits during extreme weather conditions, clear weather days, and during the typical summer afternoon thunderstorm activity, thus improving overall service reliability for FPUC customers.

*Respondent: Mark Cutshaw*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection Plan  
pursuant to Rule 25-6.030, F.A.C., Florida  
Public Utilities Company

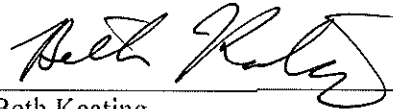
DOCKET NO. 20220049-EI

DATED: June 8, 2022

**FLORIDA PUBLIC UTILITIES COMPANY'S SUPPLEMENTAL  
RESPONSE TO CITIZEN'S  
FIFTH SET OF INTERROGATORIES (NO. 47) TO COMPANY**

Florida Public Utilities Company ("FPUC" or "Company"), hereby submits its Supplemental Response to the Fifth Set of Interrogatories (No. 47) served on the Company on May 4, 2022, by the Office of Public Counsel. The individual response follows this cover sheet.

Respectfully submitted,



Beth Keating  
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*Attorneys for Florida Public Utilities Company*

Interrogatory No. 47

**INTERROGATORIES**

47. Please provide a spreadsheet containing the following for the years 2016 through 2021:
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  - b. the total expensed cost for each individual storm, by storm, and
  - c. the highest total number of customer outages for each individual storm, by storm.

**Company Response:** Please see attached **updated** Exhibit “PMC-60”.

*Respondent: Mark Cutshaw*