ORIGINAL

Progress Energy

JAMES A. MCGEE
ASSOCIATE GENERAL COUNSEL
PROGRESS ENERGY SERVICE COMPANY, LLC

June 17, 2004

VIA HAND DELIVERY

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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COMMISSION CLERK

Dear Ms. Bayó:

Pursuant to an order of the Federal Energy Regulatory Commission (FERC) dated April 19, 2004 in Docket No. EL04-52-000, enclosed as an informational filing on behalf of Progress Energy Florida, Inc., are eight copies of the Vegetation Management Report filed with FERC on June 17, 2004.

Please acknowledge your receipt of the above filing on the enclosed copy of this letter and return to the undersigned. Thank you for your assistance in this matter.

Very truly yours,

James A. McGee

CMP _____
COM _____ JAM/scc
CTR _____ Enclosures
ECR _____
GCL 1
OPC _____ cc: Cindy Miller
MMS _____
RCA _____
SCR _____
SEC 1
OTH _____

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100 Central Avenue (33701) ▯ Post Office Box 14042 (33733) ▯ St. Petersburg, Florida
Phone: 727.820.5184 ▯ Fax: 727.820.5519 ▯ Email: james.mcgee@pgnmail.com

DOCUMENT NUMBER-DATE
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FPSC-COMMISSION CLERK

Progress Energy

June 17, 2004

Ms. Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

RE: FERC Docket No. EL04-52-001 – Vegetation Management Report

Dear Ms. Salas:

Pursuant to 18 CFR 388.112, I am enclosing the "Vegetation Management Report" submitted on behalf of Florida Power Corporation d/b/a Progress Energy Florida, Inc. in FERC Docket No. EL04-52-001. Due to the critical energy infrastructure information (CEII) contained in the report, I am requesting that sections 12 (b)-(d) of this report be exempt from public disclosure. Accordingly, I have enclosed one original and five (5) copies of the public version of the report and one original and two (2) copies of the CEII attachment.

Per the Commission's vegetation management order, a copy of this filing is being provided to the North American Reliability Council (NERC), the Florida Public Service Commission (FPSC) and the Florida Reliability Coordinating Council (FRCC).

The person to contact in the event of questions regarding the privileged treatment of this report is set forth below:

Kendal C. Bowman
Associate General Counsel
Progress Energy Service Co., LLC
410 S. Wilmington Street, PEB 17B2
Raleigh, North Carolina 27601-1849

Tel: 919-546-6794
Fax: 919-546-2920

E-mail: kendal.bowman@pgnmail.com

Very truly yours,

Len S. Anthony
Deputy General Counsel-Regulatory Affairs

LSA:mbm

Enclosures

C: NERC
FPSC
FRCC

215804

Progress Energy Service Company, LLC
P.O. Box 1551
Raleigh, NC 27602

Before the

FEDERAL ENERGY REGULATORY COMMISSION

Washington, DC 20426

In the Matter of	)	
	)	
Reporting By Transmission Providers On Vegetation Management Practices Related to Designated Transmission Facilities	)	Docket No. EL04-52-001

REPORT OF PROGRESS ENERGY FLORIDA

Florida Power Corporation, d/b/a Progress Energy Florida, Inc. (PEF), hereby submits its report regarding vegetation management practices related to transmission facilities as required by Order dated April 19, 2004 in the above captioned matter.

I. REPORT ON VEGETATION MANAGEMENT PRACTICES RELATED TO DESIGNATED TRANSMISSION FACILITIES

a) Describe in detail the vegetation management practices and standards that the transmission provider uses for control of vegetation near designated transmission facilities, and indicate the source of any standard utilized (state law or regulation, historical practice, etc.). Describe the clearance assumptions or definition used for the appropriate distance between the vegetation and the facilities. Indicate how the vegetation management practices treat vegetation that encroaches or might reasonably be expected to encroach due to growth prior to the next inspection into the line clearance zone from below, beside, and above the facilities.

See Attachment A (two attachments).

b) "Designated transmission facilities" are defined, for the purposes of this report only, as lines with a rating of 230 kV or higher as well as tie-line interconnection facilities between control areas or balancing authority areas (regardless of kV rating) and "critical" lines as designated by the regional reliability council. List the facilities under transmission provider control that meet this definition.

Due to critical energy infrastructure information contained in this section of the report, pursuant to 18 CFR 388.112 PEF has requested that detailed information in this section be exempt from public disclosure. Attachment B provides a general response for disclosure purposes.

c) For each facility identified pursuant to item b), indicate how often the transmission provider inspects that facility for vegetation management purposes. Indicate

when the most recent survey of that facility was performed, what kind of survey was used (e.g., helicopter overflight or foot patrol), and indicate what the findings of that survey showed. If the survey led to further action, indicate what action was taken and the date(s) it was performed.

Due to critical energy infrastructure information contained in this section of the report, pursuant to 18 CFR 388.112 PEF has requested that detailed information in this section be exempt from public disclosure. Attachment B provides a general response for disclosure purposes.

d) For the facilities identified pursuant to b), indicate whether identified remediation has been completed as of June 14, 2004.

Due to critical energy infrastructure information contained in this section of the report, pursuant to 18 CFR 388.112 PEF has requested that detailed information in this section be exempt from public disclosure. Attachment B provides a general response for disclosure purposes.

e) Describe any factors that the respondent believes prevents or unduly delays the performance of adequate vegetation management.

See Attachment C.

Respectfully submitted,
Progress Energy Florida

By: Len S. Anthony
Deputy General Counsel-Regulatory Affairs
410 South Wilmington Street
P.O. Box 1551
Raleigh, North Carolina 27602
919/546-6367
len.s.anthony@pgnmail.com

June 17, 2004

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Florida Power Corporation	)	Docket No. EL04-52-001
STATE OF FLORIDA	)	
	) SS:	
COUNTY OF SEMINOLE	)	

VERIFICATION

NOW, BEFORE ME, the undersigned authority, personally came and appeared, Sarah S. Rogers, who first duly sworn by me, did depose and say:

That she is a Vice President, Transmission Florida, of Progress Energy Florida, Inc. (d/b/a Florida Power Corporation), Reporter in this proceeding; she has the authority to verify the foregoing Report on behalf of Progress Energy Florida, Inc.; that she has read said Report and knows the contents thereof; and that the statements contained in said Report pertaining to Progress Energy Carolinas, Inc. are true and correct to the best of her knowledge and beliefs.

Sarah S. Rogers
Vice President, Transmission Florida
Progress Energy Florida, Inc.

Subscribed and sworn to me
this 14th day of June, 2004.

Notary Public
Sonja S. McCreary

SONJA S. MCCREARY
My Comm. Exp. 3/5/05
No. CC 983584
Personally Known ( ) Other I.D.

215686

Progress Energy-Florida
Right of Way Maintenance Standards

RIGHT OF WAY RE-CLEARING (MOWING):

Scope: Utilize rotary mowers to cut vegetation on transmission line rights of way.

Equipment: 500 kV through 69 kV Voltage Classes and de-energized transmission lines used to maintain existing ROW easement.

Frequency: Every four (4) years on 69 kV through 500 kV Voltage Class Lines

Description of Work: All of the wooded sections of the right-of-way are to be re-cleared with rotary mowers, where possible, to the full width as noted in a detail description. All undergrowth is to be cut within six (6) inches of the ground. All vines on poles and brush around poles in fields are to be cut and removed out of cropped areas. Cut all leaning trees that have been pulled into the right-of-way by storms. All brush cut from stream banks or drainage ditches must be removed from streams and ditches so as not to impede the flow of water. When run ways are cut through existing canals, the canal must be restored to original condition allowing drainage to continue as it did before our operation. The vista screens and trimmed trees are not to be cut without specific instructions from Company representative.

RIGHT OF WAY RE-CLEARING (HAND CUTTING):

Scope: Utilize chain saws and bush axes to cut vegetation on transmission line rights-of way.

Equipment: 500 kV through 69 kV Voltage Classes and de-energized transmission lines used to maintain existing ROW easement.

Frequency: Every four (4) years on 69 kV through 500 kV Voltage Class Lines

Description of Work: All of the wooded sections of the right-of-way that cannot be re-cleared with rotary mowers are to be hand cut to the full width as noted in a detail description. All undergrowth is to be cut within six (6) inches of the ground or current water level. All vines on poles and brush around poles in fields are to be cut and removed out of cropped areas. Cut all leaning trees that have been pulled into the right-of-way by storms. All brush cut from stream banks or drainage ditches must be removed from streams and ditches so as not to impede the flow of water. The vista screens and trimmed trees are not to be cut without specific instructions from Company representative.

TREE TRIMMING:

Scope: Utilize bucket trucks and appropriate trimming equipment to trim trees along the transmission line rights of way.

Equipment: 500 kV through 69 kV Voltage Classes.

Frequency: Every three (3) to four (4) years.

Description of Work: All trees requiring trimming should be trimmed so as to obtain sufficient clearance to prevent a hazard to operations for the cycle.

DANGER TREE CUTTING:

Scope: Utilize tree crews and appropriate equipment to cut danger trees along the transmission line rights of way.

Equipment: 500 kV through 69 kV Voltage Classes.

Frequency: As needed when danger trees are identified.

Description of Work: Individual trees, outside the right of way, that are identified as danger trees because they are either dead, diseased, damaged or severely leaning toward the line, will be cut at the ground or at a level that would prevent them from hitting the line should they fall.

AERIAL PATROL:

Scope: Utilize helicopter aerial patrols to identify potential problems and needed corrective actions to be taken in the coming months.

Equipment: 500 kV through 69 kV Voltage Classes.

Frequency: Three (3) times a year. Approximately every four (4) months.

Description of Work: Aerial patrols will be conducted in accordance with all applicable Progress Energy Safety Rules, OSHA regulations, work practices, and Federal, State and local regulations and ordinances. Patrols will be conducted with qualified Progress Energy personnel to look for and document conditions of the following: ROW conditions/Clearances - Encroachments - Line Equipment - Substation Equipment.

FERC Vegetation Management Practices Reporting Template 12a- Progress Energy Florida

Subject	765 kV	500 kV	345 kV	230 kV	Tie-line Interconnection facilities of other voltages
Range of ROW Width Maintained	N/A	175-190 feet, width may vary depending on restrictions imposed by (TLSA) Transmission Line Siting Act, easements of record, FDOT restrictions, environmental restrictions or limitations, multiple circuits constructed in the same corridor.	N/A	10-100 feet, width may vary depending on restrictions imposed by *(TLSA) Transmission Line Siting Act, *type of line construction (Mono pole, H-frame, tower etc.), *easements of record, *FDOT restrictions, *environmental restrictions or limitations, *USDA Forest Service Special use permits *multiple circuits constructed on the same corridor.	10-70 feet widths may vary depending on type of line construction (Mono pole, H frame, tower etc.), roadside construction or cross country, easements of record, FDOT restrictions, environmental restrictions or limitations USDA Forest Service Special use permits multiple circuits constructed on the same corridor. political or business reasons.
Minimum Clearance Assumptions	N/A	20 ft.	N/A	8 ft.	69 Kv.-4 ft 115 Kv.-5 ft.
Standards Utilized for Clearances	N/A	1) Internal Corporate Standards, as attached. 2) TSLA-(Transmission line siting Acts) if involved. 3) U.S. Forrest permits. 4) ANSI Z133.1 5) NESC Rule 218	N/A	1) Internal Corporate Standards, as attached. 2) TSLA-(Transmission line siting Acts) if involved. 3) U.S. Forrest permits. 4) ANSI Z133.1 5) NESC Rule 218	1) Internal Corporate Standards, as attached. 2) TSLA-(Transmission line siting Acts) if involved. 3) U.S. Forrest permits. 4) ANSI Z133.1 5) NESC Rule 218

Ground inspection	N/A	Comprehensive inspection 20% of system yearly. Plus "as needed" resulting from aerial inspections	N/A	Comprehensive nspection 20% of system yearly. Plus "as needed" esulting from aerial nspections	Comprehensive inspection 20% of system yearly. Plus "as needed" resulting from aerial inspections
Aerial Inspection	N/A	Minimum / 3 times per / year	N/A	3 times per / year	3 times per / year

Vegetation Management Strategy	N/A	1-Remove non-compatible vegetation every four (4) years or sooner, if necessary to maintain minimum clearance. Re-clear and trim from edge to edge o recorded easement wher possible (environmental restrictions, land owner agreements, permit restrictions etc. may impact) 2-Trim to appropriate clearances where there are no easements of record. 3-Stump treat appropriate species that have been cut by hand. 4-Remove "Danger trees" identified dead, diseased, dying, or leaning toward the line of sufficient height to impac the line if they should fall	N/A	1-Remove non-compatible vegetation every four (4) years or sooner, if necessary to maintain minimum clearance. Re-clear and trim from edge to edge of recorded easement when possible (environmental restrictions, land owner agreements, permit restrictions etc. may impact) 2-Trim to appropriate clearances where there are no easements of record. 3-Stump treat appropriate species that have been cut by hand. 4-Remove "Danger trees" identified dead, diseased, dying, or leaning toward to impact the line if they should fall.	1-Remove non-compatible vegetation every four (4) years or sooner, if necessary to maintain minimum clearance. Re-clear and trim from edge to edge of recorded easement when possible (environmental restrictions, land owner agreements, permit restrictions etc. may impact) 2-Trim to appropriate clearances where there are no easements of record. 3-Stump treat appropriate species that have been cut by hand. 4-Remove "Danger trees" identified dead, diseased, dying, or sufficient height to impact the line if they should fall.

Alternative Vegetation Management Strategy	N/A	Where restrictions due to easement limitations, legal prohibitions or other impediments do not allow tree removal, we prune trees under the wires to a minimum clearance for the line voltage.	N/A	Where restrictions due to easement limitations, legal prohibitions or other impediments do not allow tree removal, we prune trees under the wires to a minimum clearance for the line voltage.	Where restrictions due to easement limitations, legal prohibitions or other impediments do not allow tree removal, we prune trees under the wires to a minimum clearance for the line voltage.

1 Progress Energy-Florida, Rights-of-way Maintenance Standards

2 ANSI Z133.1-2000 Section 5 Pages 5-7

3 IEEE 2001. National Electric Safety Code (ANSI C2). The Institute of Electrical and Electronic Engineers, Inc. New York. NY. Page 63

FERC Vegetation Managment Practices Reporting Template: 13.

Summary of 12 b), c), d).

500 kV Progress Energy Florida inspected all three (3) of its 500 kV lines in the past year. All were inspected three (3) times each by helicopter. The Crystal River to Lake Tarpon is being re-cleared now (mowing, tree removal, herbicide work) and is being patrolled by ground at this time. The aerial inspections found several off right-of-way danger trees. All reported conditions were corrected by June 1, 2004.

230 kV Progress Energy Florida inspected all of it's 230 kV lines three (3) times by helicopter in the last year. Several lines had reported critical vegetation at various locations on the system. **ALL** of the reported concerned have been mitigated by tree removal or re-clearing, except: DSNX Dearman/Silver Springs-str 34-str 35 Still has a challenge. The PSC has halted all work by PEF until they rule on the customer's complaint about tree removal. The KWX Kathleen / West Lakeland has a customer refusal, the issue has been referred to corporate legal for resolution. Trees were temporarly trimmed; they need to be be removed. All other reports completed by June 14 2004.

115 KV Progress Energy Florida inspected all of it's 115 kV lines three (3) times by helicopter in the last year. Several 115 kV tie lines had reported critical vegetation at various locations on the system. **ALL** of the critical vegetation concerns reported on 115 kV tie lines have been mitigated by tree removal or re-clearing completed by June 14, 2004.

69 KV Progress Energy Florida inspected all of it's 69 kV lines three (3) times by helicopter in the last year. Several 69 kV tie lines had reported critical vegetation at various locations on the system. **ALL** of the reported 69 kV tie line concerns have been mitigated by tree removal or re-clearing by June 14, 2004.

FERC Vegetation Management Practices Reporting Template: 12 e).[1]

Transmission Provider: Progress Energy - Florida

Date: 6/1/2004

Source of Performance Delay/Prevention[2]: US Forest Service

Subject[3]: Electric Transmission Lines Special Use Permit, Apalachicola National Forest

Concern Level[4]: High / Medium

Description[5]:

The Electric Transmission Lines Special Use Permit for the, Apalachicola National Forest applies a different definition of "danger trees" than is in our typical easement. Their interpretation of danger trees allows many trees to remain that could easily hit the transmission line if they fell.

Forest department is requiring additional archeological and environmental studies before re-clearing takes place. Herbicide work must have written approval by the forest before application. Selective vegetation management is permitted as described in the Special Use Permit, but clearances from the conductors are limited.

The special use permits affect portions of the following lines:

- CPS- Crawfordville-Port St. Joe 230 kV

[1] Provide a separate document for each subject.
[2] Federal or state agency, local government or private entity.
[3] Specifically identify the subject organization or impediment. These can be federal, state, local or private.
[4] Low, Medium, High
[5] Describe the impediment to line clearance work. Provide sufficient detail to convey the nature and scope of the impediment, as well as the potential threat it poses transmission facilities, including the integrity of the grid.

FERC Vegetation Management Practices Reporting Template: 12 e).[1]

Transmission Provider: Progress Energy – Florida

Date: 6/1/2004

Source of Performance Delay/Prevention[2]: US Forest Service

Subject[3]: Electric Transmission Lines Special Use Permit, Ocala National Forest

Concern Level[4]: High / Medium

Description[5]:

The Electric Transmission Lines Special Use Permit for the Ocala National Forest applies a different definition of "danger trees" than is in our typical easement. Their interpretation of danger trees allows many trees to remain that could easily hit the transmission line if they fell.

Forest department is requiring additional archeological and environmental studies before re-clearing takes place. Herbicide work must have written approval by the forest before application. Selective vegetation management is permitted as described in the Special Use Permit.

The special uses permits affect portions of the following line:

SDW-Silver Springs-Deland west 230 kV line.

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[1] Provide a separate document for each subject.
[2] Federal or state agency, local government or private entity.
[3] Specifically identify the subject organization or impediment. These can be federal, state, local or private.
[4] Low, Medium, High
[5] Describe the impediment to line clearance work. Provide sufficient detail to convey the nature and scope of the impediment, as well as the potential threat it poses transmission facilities, including the integrity of the grid.

FERC Vegetation Management Practices Reporting Template: 12 e).[1]

Transmission Provider: Progress Energy - Florida

Date: 6/1/2004

Source of Performance Delay/Prevention[2]**:** Transmission Line Siting Act

Subject[3]**:** Electric Transmission Line Siting Act, Central Florida-Kathleen 500 kV.

Concern Level[4]**:** Medium

Description[5]**:**
The Electric Transmission Lines Siting Act is very restrictive as to what herbicide can be applied to this corridor, allowing only Rodeo. This restriction does not allow cost effective vegetation maintenance.

Document also contains limitations on clear cutting entire R-O-W width.

The line affected by this TLSA requirement is the:

- Central Florida-Kathleen 500 kV.

[1] Provide a separate document for each subject.
[2] Federal or state agency, local government or private entity.
[3] Specifically identify the subject organization or impediment. These can be federal, state, local or private.
[4] Low, Medium, High
[5] Describe the impediment to line clearance work. Provide sufficient detail to convey the nature and scope of the impediment, as well as the potential threat it poses transmission facilities, including the integrity of the grid.