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Public Service Commission

March 28, 2019

Ms. Beth Keating, Esq.
215 S. Monroe Street, Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

STAFF'S THIRD DATA REQUEST

RE: Docket No. 20180148-EI – Review of 2019-2021 storm hardening plan, Florida Public Utilities Company.

Dear Ms. Keating,

By this letter, the Commission staff requests that Florida Public Utilities Company (FPUC or Utility) provide responses to the following data requests.

Please refer to FPUC's storm hardening plan that was filed in Docket No. 20180148-EI.

National Electrical Safety Code (NESC) Compliance

- 1) Please refer to page 13.
 - a. What NESC construction grade does FPUC use for its distribution and transmission facilities?
 - b. Does FPUC use the same NESC construction grade for new construction as it does for replacement?
 - c. Aside from wood and concrete poles, is FPUC using any other type of poles?
 - d. Please provide the height and material of FPUC's transmission and distribution poles?
 - e. Does FPUC use any software to design its distribution and transmission supporting structures? If yes.
 - i. Does the software comply with the 2017 NESC?
 - ii. Does the software's operator need to know the 2017 NESC code to enter the correct information into the software? Example: Enter the Basic Wind Speed as specified by Figure 250-2 of the 2017 NESC into the software.

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- iii. What is the name and version of the software?

Extreme Wind Loading (EWL) Standards

- 2) Please refer to page 14. Is FPUC applying any safety (load or strength) factor to exceed the NESC minimum requirements?

Mitigation of Flooding and Storm Surge Damage

- 3) Please refer to page 15.
- a. Has FPUC adopted and/or implemented any new procedure to build underground distribution to mitigate damage due to flooding and Storm Surges, like the installation of submersible equipment?
 - b. Has FPUC conducted any testing to check the reliability of the underground system in the event of flooding in the area where the underground system has been installed? If yes, please explain the results and findings.
 - c. Has FPUC learned any lessons from previous underground projects? If yes, please explain the lessons learned.
 - d. Does FPUC consider the terrain's characteristics, soil consistency, historical data and FEMA flooding maps when selecting the Storm hardening underground project selection? Please explain.

Deployment Strategies

- 4) Please refer to pages 14 and 15. FPUC listed 10 projects with an average cost of \$357,000 per project. In the 2016-2018 plan, FPUC listed 8 projects with an average cost of \$166,000 per project. Why is there an increase in cost per project?
- 5) Please refer to page 16. What is involved in the rebuilding of the critical infrastructure distribution lines?

Ten Initiatives

- 6) Please refer to page 7: Storm Hardening Activities for Transmission Structures. Does FPUC have an estimated number of wood transmission pole replacements for 2019, 2020, and 2021? If no, why not?
- 7) Please refer to page 11: Outage Data for Overhead and Underground Systems.
- a. Please explain how FPUC collects outage data for overhead and underground systems.
 - b. What format is used to store its outage data?

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- c. How does FPUC use its outage data to evaluate the reliability of its overhead and underground systems?
- 8) Please complete the table attached.

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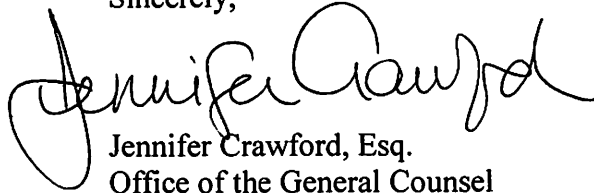
Activity	Any change from current plan. (Y/N) *	Actual Cost									Estimated Cost								
		2016			2017			2018			2019			2020			2021		
		O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total	O&M	Capital	Total
8-Year Wooden Pole Inspection Program																			
10 Storm Hardening Initiatives																			
1	A Three-Year Vegetation Management Cycle for Distribution Circuits																		
2	An Audit of Joint-Use Attachment Agreements																		
3	A Six-Year Transmission Structure Inspection program																		
4	Hardening of Existing Transmission Structures																		
5	Transmission and Distribution GIS																		
6	Post-Storm Data Collection and Forensic Analysis																		
7	Collection of Detailed Outage data Differentiating Between the Reliability Performance of Overhead and Underground Systems																		
8	Increased Utility Coordination with Local Governments																		
9	Collaborative Research on Effects of Hurricane Winds and Storm Surge																		
10	A Natural Disaster Preparedness and Recovery Program **																		
Totals																			
Any Other Key Elements or Proposed Initiatives																			

*Please explain any changes from the current plan

** Please provide a copy of the disaster plan

Please file all responses electronically no later than Thursday, April 18, 2019, on the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing web Form. Please contact me at (850) 413-6228 or Penelope Buys at (850) 413-6518 if you have any questions.

Sincerely,



Jennifer Crawford, Esq.
Office of the General Counsel

JSC/lms

cc: Office of Commission Clerk