Matilda Sanders

ORIGINAL

From: Martha Johnson [marthaj@fcta.com]

Sent: Wednesday, July 26, 2006 2:02 PM

To: Filings@psc.state.fl.us

Cc: Jennifer Brubaker; Rosanne Gervasi; john_butler@fpl.com; sdriteno@southernco.com; paul.lewisjr@pgnmail.com; RegDept@tecoenergy.com; jenglish@fpuc.com; Harold Mclean; FCTA; cdudley@bcmdm.com; Janice Caluda; klayton_fennell@cable.comcast.com; bill_ferry@cable.comcast.com; diane.culpepper@mybrighthouse.com; Keith Gregory; Kevin Hyman; Tim Gage; bgluckma@mediacomcc.com; alison_jenkin@cable.comcast.com; Barbara Bonowicz; Bret Perkins; brian_rankin@comcast.com; ccraib@mediacomcc.com; christopher_mcdonald@cable.comcast.com; Cody J. Harrison; dgarofano@atlanticbb.com; grace_manno@comcast.com; jane.bremer@adelphia.com; jmcknight@mediacomcc.com; jpagano@advancedcable.net; john_sullivan@comcast.com; julie.patterson@twcable.com; katyodonnell@mediacomcc.com; kay.jackson@cox.com; kmaguire@atlanticbb.com; John Spalding; Kristen Weathersby; Sandra Sigmund; wesley.benton@cox.com; bkerr@atlanticbb.com; gene.white@mybrighthouse.com; joe.crone@twcable.com; john_norton@cable.comcast.com; mark.o'ceallaigh@cox.com; mickeyharrelson@yahoo.com; scheller@advancedcable.net; srouth@mediacomcc.com

Subject: Docket No. 060198 - FCTA Comments on 7-14-06 Informal Meeting

Attachments: 060198 - Comments from 7-14-06 Workshop.doc

CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
RCA _____
SCR _____
SGA _____
SEC _____
OTH _____

A. The person responsible for this electronic filing is:

Michael A. Gross
Vice President, Regulatory Affairs and Regulatory Counsel
Florida Cable Telecommunications Association
246 E. 6th Avenue
Tallahassee, FL 32303
850/681-1990
850/681-9676 (fax)
mgross@fcta.com

B. The docket number and title is:

In Re: Docket No. 060198- IE - Requirement for investor-owned electric utilities to file ongoing storm preparedness plans and implementation cost estimates.

C. This document is filed on behalf of the Florida Cable Telecommunications Association, Inc.

D. The Comments are a total of 3 pages.

E. Attached are the Florida Cable Telecommunications Association's Comments on the July 14, 2006 Informal Meeting Regarding Storm Implementation Plans Which the Utilities have Filed in Response to Order No. PSC-06-0351-PAA-EI.

Thank you,

Martha Johnson
Regulatory Assistant
Florida Cable Telecommunications Association
246 E. 6th Avenue
Tallahassee, FL 32303
850/681-1990
850/681-9676 (fax)

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Requirement for investor-owned electric utilities to file ongoing storm preparedness plans and implementation cost estimates.	**Docket No. 060198-EI**
	Filed: July 26, 2006

/

The Florida Cable Telecommunications Association's Comments on the July 14, 2006 Informal Meeting Regarding Storm Implementation Plans Which the Utilities have Filed in Response to Order No. PSC-06-0351-PAA-EI

FCTA members have experienced the devastation of facilities and the associated long power outages caused by the recent hurricanes in Florida. Damages totaling many millions of dollars have been caused to cable TV facilities, along with similar damage to power and telephone lines and poles.

The FCTA and its members appreciate the tremendous amount of work already done by the FPSC and the power companies in Florida to improve hurricane preparedness and recovery. Our members agree that pole structure failure including the guy wires and other structural components are a major cause of both power outages and damage to communications cables.

The most effective effort to reduce widespread and lengthy power outages is Initiative # 3 to inspect transmission poles and substations and, it is assumed, to take remedial or corrective actions to repair or restore transmission lines and substations to design strengths and performance criteria.

Initiative #4 to harden transmission structures will help greatly to keep the power supply available to substations in communities near to and far from the immediate impact area of hurricanes. If the power transmission source(s) to substation(s) fails, all effective means of distribution line hardening are useless so long as the transmission and or substation remains out. Priority one is reliability and restoration strategies for (a) power generation stations (b) power transmission lines and (c) power substations. Many hours and days of power outages were suffered after hurricanes Charlie and Wilma because of transmission line outages alone.

Distribution lines have generally much smaller poles, but they are much more numerous than transmission line structures. Distribution line and pole failures cause localized power outages. The major causes of problems with distribution lines during hurricanes are: trees, tree limbs, flying building and other debris, poles rotten at the ground line, and broken or ineffective guy wires. Therefore, priority two should be initiative #1 vegetation management or tree trimming.

The previously ordered eight-year inspection cycle for wood distribution pole strength including guy wire inspection, if it requires remediation of defects found, will be effective in reducing power outages and damage to communications lines. We would place priority #3 on this requirement of Order No. PSC-06-0144-PAA-EI in Docket No. 060078-EI.

Docket No. 060173-EU proposes that some distribution lines be built to extreme wind standards and therefore affects wind loading assessment on poles audited for cable attachments. Audits of joint-use attachments are required in Order No. 06-0351. Therefore we are also making comments on the increased strength requirements.

Since reliability of transmission lines is most critical to the prevention of widespread and prolonged power outages and the transmission poles or structures are taller and frequently in inaccessible locations, increased design strength for transmission structures and tree clearing where required will be very effective in reducing power outages. The effectiveness of increased strength of design for distribution poles will have limited effect because of several factors.

Distribution lines and poles are often surrounded by trees and buildings, particularly in urban areas. It is not effective to build stronger distribution lines, only to have them brought down by tall trees and flying debris. Urban areas are also where the greatest concentration of communications cables are attached to distribution poles. It is rare that a distribution pole is broken by wind force alone, resulting from the added wind load caused by communications cable attachments.

Another common cause of wood pole failures is cascading of solid (strong) poles because an adjacent pole breaks in high wind because of rot or other defect. Pole inspection with appropriate remediation together with periodic storm guying is effective to minimize cascading.

Soft soil made worse by heavy rain causes many distribution poles to lean or fall. This is actually a design problem which can be addressed in a number of ways including compacting stone into the pole holes around the poles and storm guying.

Initiative 2 is the requirement in Docket No. 060198-EI to audit joint-use distribution pole attachments <u>including pole strength assessments</u>. This requirement could demand an unreasonable portion of available resources with marginal improvement of power reliability if detailed pole loading analysis is done on all joint-use poles. We recommend a sampling approach such as Gulf Power is proposing to further determine the actual extent of problems and effectiveness of appropriate remediation.[1] Accountability for

[1] Item 3 within Gulf Power's proposal on Initiative 2 states: "Will verify attachments that have been made pursuant to current joint-use agreement through a 5 year cycle." In litigation pending between the FCTA and Gulf Power at the FCC, *Florida Cable Telecommunications Ass'n, Inc., et al. v. Gulf Power Co.;* EB Docket No. 04-381, 3 of the 4 cable operators involved do not formally have "current" joint-use agreements, so

overloading which is identified will be important. The pole loading for power, telephone, cable TV, and others should be separately calculated to produce the total pole loading.

A communication cable does add wind load to a pole line. Multiple cables obviously add more load. Proper engineering design requires considering the effects of all pole attachments on the pole. Measures should be taken to assure that adequate engineering is performed on new lines and new attachments. Power lines and facilities alone and in combination with communications can overload poles. Auditing of the effect of existing lines on pole loading and poles should be well planned to be adequate and cost effective.

There is widespread consensus among power, telephone, and cable TV companies that the transmission and substation inspection, transmission pole hardening, tree-trimming (vegetation management) and distribution pole inspection initiatives will be very effective in reducing the number and length of power outages. We believe these initiatives should move forward with the oversight required by the Florida Public Service Commission. We also urge that the analysis of loading of existing poles be carefully evaluated before finalizing the requirements of Docket No. 060198-EI and Docket No. 060173-EU.

Prepared by:

M.T. (Mickey) Harrelson
Professional Engineer
P.O. Box 432
McRae, GA 31055

On behalf of the Florida Cable Telecommunications Association

---

more appropriate language for Gulf Power in Item 3, Initiative 2, would call for Gulf Power to check whether attachments have been approved/permitted under a joint-use agreement or other existing arrangements.