ORIGINAL

MEMORANDUM

September 28, 2006

TO: DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE SERVICES

FROM: OFFICE OF THE GENERAL COUNSEL (GERVASI)

RE: DOCKET NO. 060198-EI - Requirement for investor-owned electric utilities to file ongoing storm preparedness plans and implementation cost estimates.

Attached are documents regarding the October 30, 2006 staff workshop including the Agenda and topics of discussion, to be filed in the above-referenced docket.

DATE DOCUMENT SENT TO CCA 9/28/06

RG
Attachment
I:/2006/060198/060198.rg.doc

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Patti Zellner

From: Rosanne Gervasi
Sent: Wednesday, September 27, 2006 4:58 PM
To: Patti Zellner
Subject: FW: Informal Request for Comments on Storm Initiatives Metrics - Scope of March 1st Reports (DN 060198-EI)
Attachments: 10 point plans report.doc; AGENDA.doc

Patti, I got the addresses I needed and sent the e-mail below. Could you please have it filed in DN 060198-EI, including the attachments? Thanks!

From: Rosanne Gervasi
Sent: Wednesday, September 27, 2006 4:57 PM
To: 'mcutshaw@fpuc.com'; 'dmyers@fpuc.com'; 'paul.lewisjr@pgnmail.com'; 'Lynn Adams'; 'wjstiles@tecoenergy.com'; 'htbryant@tecoenergy.com'; 'rgliving@southernco.com'; 'EJBATTAG@southernco.com'
Cc: Michael Gross; 'gene@penningtonlaw.com'; 'de.oroark@verizon.com'; Susan Masterton; 'James.Meza@bellsouth.com'; 'john.noland@henlaw.com'; 'swright@yvlaw.net'; 'bmoline@publicpower.com'; 'mhershel@feca.com'; 'billheth@iline.com'; 'lcox@llw-law.com'; Harold Mclean; Mary Anne Helton; Michael Cooke; Jim Breman; Tony Swearingen; Bob Trapp; Bill McNulty; Rosanne Gervasi
Subject: Informal Request for Comments on Storm Initiatives Metrics - Scope of March 1st Reports (DN 060198-EI)

A staff workshop with the electric IOUs has been scheduled and noticed for October 30, 2006, to gain consensus on the information that each electric IOU will submit annually on March 1st in response to Docket No. 060198-EI, In Re: Requirement for Investor-Owned Electric Utilities to File Ongoing Storm Preparedness Plans and Implementation Cost Estimates. Please find attached the information staff has proposed to be submitted annually by the electric IOUs on the storm initiatives. To facilitate the discussion at the workshop, please review and provide your response/feedback to staff's proposal on or before October 17, 2006. Please file your responses with the Division of Commission Clerk and Administration Services in Docket No. 060198-EI.

Staff envisions that the multiple reports required by March 1, including the Storm Initiatives Report (Order No. PSC-06-0781-PAA-EI), the Wood Pole Inspection Report (Order No. PSC-06-0144-PAA-EI), and the Distribution Reliability Report (Rule 25-6.0455), will be filed as a single cohesive document. Staff believes such a document will provide an in-depth review of the distribution reliability function and storm preparedness review for each utility. At the workshop, Staff intends to discuss its expected level of detail necessary to support the required data. Staff intends to pursue this in order to greatly reduce the need for multiple post-report filing data requests.

Feel free to contact me if you have any questions.

Thank you,

Rosanne Gervasi, Senior Attorney

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Tallahassee, FL 32399-0863
tel: (850) 413-6224
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AGENDA – Staff Workshop – October 30, 2006

Item 1 – Discussion of Ten Initiatives Reporting Requirements
Item 2 – Discussion of Annual Pole Inspection Report Requirement
Item 3 – Discussion of Annual Distribution Reliability Report Requirements

Initiative 1 – Three-Year Vegetation Cycle

Performance Metrics: Adjusted data includes only activities that are budgeted and included in the Company's filed vegetation management plan. Unadjusted data is to include all performance data including hurricane performance and all other vegetation caused outage events that the Company believes to be excludable pursuant to 25-6.0455, F.A.C. The difference between unadjusted data and adjusted data are the storm reliability performance metrics. Reports due March 1, 2007 should have both the data for the base year (2005) and the data for 2006. All variances from the Company's Program, if any, should be noted in this section of the report.

The tables below provide guidance for the data being sought by staff. If customer minutes of interruptions are not recorded or tracked, then provide an explanatory note and substitute whatever performance data is recorded.

System Vegetation Management Performance Metrics

	Feeders			Laterals		
	Unadjusted	Adjusted	Diff.	Unadjusted	Adjusted	Diff.
(A) Number of Outages						
(B) Customer Interruptions						
(C) Miles Cleared						
(D) Remaining Miles						
(E) Outages per Mile [A ÷ (C + D)]						
(F) Vegetation CI per Mile [B ÷ (C + D)]						
(G) Number of Hotspot trims						
(H) All Vegetation Management Costs						
(I) Customer Minutes of Interruption						
(J) Outage restoration costs						
(K) Vegetation Budget (current year)						
(L) Vegetation Goal (current year)						
(M) Vegetation Budget (next year)						
(N) Vegetation Goal (next year)						
(O) Trim-Back Distance						

Management Region Vegetation Management Performance Metrics

	Feeders			Laterals		
	Unadjusted	Adjusted	Diff.	Unadjusted	Adjusted	Diff.
(A) Number of Outages						
(B) Customer Interruptions						
(C) Miles Cleared						
(D) Remaining Miles						
(E) Outages per Mile [A ÷ (C + D)]						
(F) Vegetation CI per Mile [B ÷ (C + D)]						
(G) Number of Hotspot trims						
(H) All Vegetation Management Costs						
(I) Customer Minutes of Interruption						
(J) Outage restoration costs						
(K) Vegetation Budget (current year)						
(L) Vegetation Goal (current year)						
(M) Vegetation Budget (next year)						
(N) Vegetation Goal (next year)						
(O) Trim-Back Distance						

If additional metrics are used, then all such data and analysis should be included in this section of the report.

Comparison with a Three-Year Program: Provide a comparison of a three-year trim cycle program and the achieved performance of the program implemented on both an adjusted and unadjusted basis.

Feeder Comparison with A Three-Year Cycle Based Program

	Three-Year Cycle Program			Company Program		
	Unadjusted	Adjusted	Diff.	Unadjusted	Adjusted	Diff.
(A) Number of Outages						
(B) Customer Interruptions						
(C) Miles Cleared						
(D) Remaining Miles						
(E) Outages per Mile [A ÷ (C + D)]						
(F) Vegetation CI per Mile [B ÷ (C + D)]						
(G) Number of Hotspot trims						
(H) All Vegetation Management Costs						
(I) Customer Minutes of Interruption						
(J) Outage Restoration Costs						
(K) Trim-Back Distance						

Lateral Comparison with A Three-Year Cycle Based Program

	Three-Year Cycle Program			Company Program		
	Unadjusted	Adjusted	Diff.	Unadjusted	Adjusted	Diff.
(A) Number of Outages						
(B) Customer Interruptions						
(C) Miles Cleared						
(D) Remaining Miles						
(E) Outages per Mile [A ÷ (C + D)]						
(F) Vegetation CI per Mile [B ÷ (C + D)]						
(G) Number of Hotspot trims						
(H) All Vegetation Management Costs						
(I) Customer Minutes of Interruption						
(J) Outage Restoration Costs						
(K) Trim-Back Distance						

Support for continuation of the Company Program, rather than a Three-Year Cycle program, should be included in this section of the report. Include all tables and additional analysis supporting continuation of the Company Program in this section of the report.

Local Community Participation: A discussion addressing utility efforts to collect and use input from local communities and governments regarding (a) r-o-w tree clearing, (b) easement tree clearing, (c) hard-to-access facilities, (d) danger trees not within r-o-w or within easements where the utility has unobstructed authority to remove the danger tree, and (e) trim-back distances.

Danger Trees – Additional Questions

a) Number of danger trees removed? _____
b) Expenditures on danger tree removal? _____
c) Number of request for removals that were denied? _____
d) Avoided CI with danger trees removed (estimate)? _____
e) Avoided CMI with danger trees removed (estimate)? _____

Initiative 2 – Joint-Use Pole Attachment Audits for the year

Describe the extent of the audit and results pertaining to pole reliability and NESC safety matters. The intent is to assure the Commission that utilities know the status of their facilities and that reasonable efforts are taken to address pole reliability and NESC safety matters.

a) Percent of system audited. _____ feeders :____ laterals :____
b) Date audit conducted? _____
c) Date of previous audit? _____
d) List of audits conducted annually. _____

Joint-Use Attachment Audits – Distribution Poles

(A) Number of company owned distribution poles.	
(B) Number of company distribution poles leased.	
(C) Number of owned distribution pole attachments	
(D) Number of leased distribution pole attachments.	
(E) Number of authorized attachments.	
(F) Number of unauthorized attachments.	
(G) Number of distribution poles strength tested.	
(H) Number of distribution poles passing strength test.	
(I) Number of distribution poles failing strength test (overloaded).	
(J) Number of distribution poles failing strength test (other reasons).	
(K) Number of distribution poles corrected (strength failure).	
(L) Number of distribution poles corrected (other reasons).	
(M) Number of distribution poles replaced.	
(N) Number of apparent NESC violations involving electric infrastructure.	
(O) Number of apparent NESC violations involving 3rd party facilities.	

State whether pole rents are jurisdictional or non-jurisdictional. If pole rents are jurisdictional, then provide an estimate of lost revenue and describe the company's efforts to minimize the lost revenue.

Initiative 3 – Six-Year Inspection Cycle for Transmission Structures

Describe the extent of the inspection and results pertaining to transmission wires, towers, and substations for reliability and NESC safety matters. The intent is to assure the Commission that utilities know the status of their facilities and that reasonable efforts are taken to address transmission structure reliability and NESC safety matters.

Transmission Circuit, Substation and Other Equipment Inspections

	Activity		Current Budget		Next Year	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Total transmission circuits.						
(B) Planned transmission circuit inspections.						
(C) Completed transmission circuit inspections.						
(D) Percent of transmission circuit inspections completed.						
(E) Planned transmission substation inspections.						
(F) Completed transmission substation inspections.						
(G) Percent transmission substation inspections completed.						
(H) Planned transmission equipment inspections (other equipment).						
(I) Completed transmission equipment inspections (other equipment).						
(J) Percent of transmission equipment inspections completed (other equipment).						

Transmission Tower Structure Inspections

	Activity		Current Budget		Next Year	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Total transmission tower structures.						
(B) Planned transmission tower structure inspections						
(C) Completed transmission tower structure inspections.						
(D) Percent of transmission tower structure inspections completed.						

Transmission Pole Inspections

	Activity		Current Budget		Next Year	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Total number of transmission poles.						
(B) Number of transmission poles strength tested.						
(C) Number of transmission poles passing strength test.						
(D) Number of transmission poles failing strength test (overloaded).						
(E) Number of transmission poles failing strength test (other reasons).						
(F) Number of transmission poles corrected (strength failure).						
(G) Number of transmission poles corrected (other reasons).						
(H) Total transmission poles replaced.						

Initiative 4 – Storm Hardening Activities for Transmission Structures

Describe the extent of any upgrades to transmission structures for purposes of avoiding extreme weather, storm surge or flood-caused outages, and to reduce storm restoration costs. The intent is to assure the Commission that utilities are looking for and implementing storm hardening measures.

Hardening of Existing Transmission Structures

	Activity		Current Budget		Next Year	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Transmission structures scheduled for hardening.						
(B) Transmission structures hardening completed.						
(C) Percent transmission structures hardening completed.						

Describe the method of selecting each hardening activity. How does the utility know the activity is better than other activities? Which other activities did it consider? What input, if any, did local communities and governments have?

Initiative 5 – Geographic Information System (GIS)

Distribution OH Data Input

	Activity		Current Budget		Next Year	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Total number of system wide OH assets for input.						
(B) Number of OH assets currently on system.						
(C) Percent of OH assets already on system.						
(D) Annual OH assets targeted for input (goal).						
(E) Annual OH assets input to system (actual).						
(F) Annual percent of OH assets input.						

Distribution UG Data Input

	Activity		Current Budget		Next Year	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Total number of system wide UG assets for input.						
(B) Number of UG assets currently on system.						
(C) Percent of UG assets already on system.						
(D) Annual UG assets targeted for input (goal).						
(E) Annual UG assets input to system (actual).						
(F) Annual percent of UG assets input.						

Transmission OH Data Input

	Activity		Current Budget		Next Year	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Total number of system wide OH transmission assets for input.						
(B) Number of OH transmission assets currently on system.						
(C) Percent of OH transmission assets already on system.						
(D) Annual OH transmission assets targeted for input.						
(E) Annual OH transmission assets input to system.						
(F) Annual percent of OH transmission assets input.						

Transmission UG Data Input

	Activity		Current Budget		Next Year	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Total number of system wide UG transmission assets for input.						
(B) Number of UG transmission assets currently on system.						
(C) Percent of UG transmission assets already on system.						
(D) Annual UG transmission assets targeted for input.						
(E) Annual UG transmission assets input to system.						
(F) Annual percent of UG transmission assets input.						

Initiative 6 – Post-Storm Data Collection and Forensic Analysis

a) Has forensics team been established? _____
b) Have forensics measurements been established? _____ If yes, please describe/provide.
c) Has forensics database format been established? _____
d) Describe/provide GIS and forensics data tracking integration.
e) Describe/provide forensics and restoration process integration.(Established and documented processes to capture forensics data during the restoration process.)
f) Describe/provide any forensics data sampling methodology.
g) Describe/provide forensics reporting format used to report forensics results to the Company and the Commission.

Initiative 7 – Outage Data Differentiating Between Overhead and Underground Systems

Describe the extent of any upgrades or expansions of systems or processes implementing Initiatives 5, 6 and 7. For example, increases to existing plant performance tracking, processes to implement forensic analysis when needed such as outsource agreements, efforts to perform forensic analysis outside of a real storm event, etc. The intent is to assure the Commission that utilities are looking for and implementing storm hardening measures.

Overhead(OH) Storm Data – per System

a) Total storm outages per system.
b) Total storm outages per cause type.
c) Customers(C) served per system.
d) Customer Interruptions(CI) per system.
e) Customer Minutes of Interruption(CMI) per system.
f) Number of outage events(N) per system.
g) Storm SAIDI per system.
h) Storm CAIDI per system.
i) Storm SAIFI per system.
j) Storm L-bar per system.
k) Overhead equipment performance analysis by type per system.(wood pole vs. concrete pole, etc.)

Overhead(OH) Storm Data – per District

a) Total storm outages per district.
b) Total storm outages per cause type.
c) Customers(C) served per district.
d) Customer Interruptions(CI) per district.
e) Customer Minutes of Interruption(CMI) per district.
f) Number of outage events(N) per district.
g) Storm SAIDI per district.
h) Storm CAIDI per district.
i) Storm SAIFI per district.
j) Storm L-bar per district.
k) Overhead equipment performance analysis by type per district.(wood pole vs. concrete pole, etc.)

Underground(UG) Storm Data – per System

a) Total storm outages per system.
b) Total storm outages per cause type.
c) Customers(C) served per system.
d) Customer Interruptions(CI) per system.
e) Customer Minutes of Interruption(CMI) per system.
f) Number of outage events(N) per system.
g) Storm SAIDI per system.

h) Storm CAIDI per system.
i) Storm SAIFI per system.
j) Storm L-bar per system.
k) Underground equipment performance analysis by type per system.

Underground(UG) Storm Data – per District

a) Total storm outages per district.
b) Total storm outages per cause type.
c) Customers(C) served per district.
d) Customer Interruptions(CI) per district.
e) Customer Minutes of Interruption(CMI) per district.
f) Number of outage events(N) per district.
g) Storm SAIDI per district.
h) Storm CAIDI per district.
i) Storm SAIFI per district.
j) Storm L-bar per district.
k) Underground equipment performance analysis by type per district.

Initiative 8 – Increase Coordination with Local Governments

Describe extra tree trimming and underground ground conversion projects implemented. Describe any special considerations or options local governments attempted to secure and the utility's responses.

Are the companies regarding the buildup to a potential hurricane (even when one does not ultimately develop) as an opportunity for a test or dry run which can form the basis for evaluating their storm preparation and response plans? If yes, what quantifiable indices (metrics), if any, are the companies using to assess the effectiveness with which they began implementing Initiative #8? Examples might be as follows:

Ongoing Programs:

a) Number of city/county liaisons initiated. ____
b) Number of periodic communications initiated with cities/counties. ____
c) Number of restoration training and assistance programs conducted. ____
d) Number of city/county problem resolution plans. ____

Storm Preparation:

a) Number of communications links and contingency plans established. ____
b) Number of operational contingency plans developed for emergency services. ____
c) Number of public communications plans developed prior to, during & after the storm. ____
d) Number of city/county mitigation guidelines prepared and distributed. ____

Storm Restoration:

a) Number of emergency communication links maintained. ____
b) Number of priority emergency services restored. ____
c) For each tropical storm, hurricane and other emergency event impacting the utility's service area , what community coordination actions did the utility pursue not otherwise in a) and b) above____

In the last tropical storm (Alberto?) (Which did not come ashore in Florida as a hurricane), did the Company trigger its storm response Plan? If yes, did the Company include Initiative #8 (Increased Coordination with Local Government) in that storm response? If yes, what did the Company do? If no, Why not?

Are the companies planning to do a post mortem assessment of that effort along with a review of the overall storm response plan implementation? If yes, when will this assessment be available?

a) Provide any post-mortem assessment following

Initiative 9 – Collaborative Research

Project Planning Report: For each project identified by the Steering Committee, provide a report that includes the purpose, scope, objectives, research method, data inputs, expected costs and benefits, sources of funding, schedule, and findings to date.

Annual Progress Report: For each project previously identified by the Steering Committee for which ongoing research is being pursued but not completed, provide an annual report, including updates on all aspects of the Project Planning Report

Project Completion Summary Report: For each concluded project identified by the Steering Committee, provide a report that includes an assessment of the success of the research project, as well as any proposed implementation plan for any results or findings for each utility. Describe the benefits expected or realized as a result of plan implementation on storm hardening for each utility.

Annual Report of the Collaborative Research Effort: Provide a report to include an overall assessment of the collaborative research program to date, as described in the Memorandum of Understanding (MOU) dated August 1, 2006, including its operational and financial viability and future planning of the organization. Identify any extension of the MOU contemplated or finalized by the Steering Committee.

Describe the projects promoted, costs incurred, and benefits achieved. A single joint filing can address all collaborative research. Utilities should also discuss any additional independent activities in which it is engaged, such as EPRI, private research, or through universities.

Initiative 10 – Disaster Preparedness and Recovery Plan

Submit formal disaster preparedness plan annually by March 1st. Include disaster recovery training completed, pre-storm preparation and staging activities, post storm recovery plans, lessons learned, and plan modifications or changes.