

**Ruth Nettles**

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**Sent:** Wednesday, August 08, 2007 4:59 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Susan Masterton  
**Subject:** Docket Nos. 070297, 070298, 070299 and 070301-EI: Embarq's Initial Responses to Staff's Preliminary Draft Issues  
**Attachments:** 070297-070301-EI- Cole Embarq Issues 8.8.2007.doc

**ORIGINAL**

**Filed on Behalf of:** Susan S. Masterton

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**Docket No.** 070297, 070298, 070299, and 070301-EI

**Title of filing:** Embarq's Intial Responses to Staff's Preliminary Draft Issues  
**Filed on behalf of:** Susan Masterton

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ORIGINAL



**EMBARQ**

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August 8, 2007

Ann Cole  
Office of Commission Clerk  
Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0870

Re: Docket Nos. 070297, 070298, 070299, and 070301-EI; Embarq Florida, Inc.'s

Dear Ms. Cole:

Enclosed for filing on behalf of Embarq Florida, Inc. are Embarq's Initial Responses to Staff's Preliminary Draft Issues.

Copies are being served on the parties in this docket pursuant to the attached certificate of service.

If you have any questions regarding this electronic filing, please do not hesitate to call me at 850/599-1560.

Sincerely,

s/ Susan S. Masterton  
Susan S. Masterton

Susan S. Masterton  
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FPSC-COMMISSION CLERK

**Embarq Florida, Inc.'s Initial Responses to Staff's Preliminary Draft Issues  
Dockets 070297-EI – 070301-EI**

- 1. Does the Company's Plan meet the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties? [Rule 25-6.0342(2)]**

Embarq understands that Staff is removing this issue as redundant of issue number 14 below.

- 2. Does the Company's Plan address the extent to which, at a minimum, the Plan complies with the National Electric Safety Code (ANSI C-2) [NESC] that is applicable pursuant to subsection 25-6.0345(2), F.A.C. [Rule 25-6.0342(3)(a)]**

**FPL:** Embarq has no position at this time.

**PEC:** Embarq has no position at this time.

**TECO:** Embarq has no position at this time.

**GULF:** Embarq has no position at this time.

- 3. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)]**

**FPL:** Embarq has no position at this time.

**PEC:** Embarq has no position at this time.

**TECO:** Embarq has no position at this time.

**GULF:** Embarq has no position at this time.

- 4. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system,**

**including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]**

**FPL:** Embarq has no position at this time.

**PEC:** Embarq has no position at this time.

**TECO:** Embarq has no position at this time.

**GULF:** Embarq has no position at this time.

- 5. Does the Company's Plan address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and geographical boundaries and other applicable operational considerations? [Rule 256.0342(3)(b)3]**

**FPL:** Embarq has no position at this time.

**PEC:** Embarq has no position at this time.

**TECO:** Embarq has no position at this time.

**GULF:** Embarq has no position at this time.

- 6. Does the Company's Plan address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(c)]**

**FPL:** Embarq has no position at this time.

**PEC:** Embarq has no position at this time.

**TECO:** Embarq has no position at this time.

**GULF:** Embarq has no position at this time.

- 7. Does the Company's Plan address the extent to which the placement of new and replacement distribution facilities facilitate safe and efficient access for installation and maintenance pursuant to Rule 25- 6.0341, F.A.C? [Rule 25-**

**6.0342(3)(d)]**

**FPL:** Embarq has no position at this time.

**PEC:** Embarq has no position at this time.

**TECO:** Embarq has no position at this time.

**GULF:** Embarq has no position at this time.

**8. Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]**

**FPL:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**PEC:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**TECO:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding,

Embarq reserves the right to revise its position.

**GULF:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**9. Does the Company's Plan provide a detailed description of the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3. are to be made? [Rule 25-6.0342(4)(b)]**

**FPL:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**PEC:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**TECO:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an

ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**GULF:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**10. Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]**

**FPL:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**PEC:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**TECO:** Embarq has received information from the Company that appears to provide the necessary detail related to

Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**GULF:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**11. Does the Company's Plan provide an estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]**

**FPL:** Embarq has no position at this time.

**PEC:** Embarq has no position at this time.

**TECO:** Embarq has no position at this time.

**GULF:** Embarq has no position at this time.

**12. Does the Company's Plan provide an estimate of the costs and benefits, obtained pursuant to subsection (6) below, to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages realized by the third-party attachers? [Rule 25-6.0342(4)(e)]**

**FPL:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq is currently reviewing the information provided and revising its costs based on the additional detail provided. Embarq understands that it is currently contemplated that details for years

2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its costs and position on this issue, based on these revisions.

**PEC:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq is currently reviewing the information provided and revising its costs based on the additional detail provided. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its costs and position on this issue, based on these revisions.

**TECO:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Based on the information provided, it appears TECO's current plan will have no cost impact on Embarq. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its costs and position on this issue, based on these revisions.

**GULF:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq is currently reviewing the information provided and revising its costs based on the additional detail provided. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that

the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its costs and position on this issue, based on these revisions.

**13. Does the Company's Plan include written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSI C-2) that is applicable pursuant to Rule 25-6.034, F.A.C.? [Rule 25-6.0342(5)]**

**FPL:** Embarq is in the process of reviewing the Company's Attachment Standards and Procedures included with the plan and the affect of those standards and procedures on Embarq's current operations, if any.

**PEC:** Embarq is in the process of reviewing the Company's Attachment Standards and Procedures included with the plan and the affect of those standards and procedures on Embarq's current operations, if any.

**TECO:** Embarq is in the process of reviewing the Company's Attachment Standards and Procedures included with the plan and the affect of those standards and procedures on Embarq's current operations, if any.

**GULF:** Embarq is in the process of reviewing the Company's Attachment Standards and Procedures included with the plan and the affect of those standards and procedures on Embarq's current operations, if any.

**14. Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties.[ Ride 25-6.0342(1) and (2)].**

**FPL:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq is currently reviewing the information provided and preparing revised estimates of its cost/benefit analysis based on the additional detail provided. Embarq understands that it is

currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**PEG:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq is currently reviewing the information provided and preparing revised estimates of its cost/benefit analysis based on the additional detail provided. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**TECO:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Based on the information provided, it appears TECO's current plan will have no cost impact on Embarq. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a result of this proceeding, Embarq reserves the right to revise its position.

**GULF:** Embarq has received information from the Company that appears to provide the necessary detail related to Embarq for the Company's storm hardening plans for Calendar Year 2007. Embarq is currently reviewing the information provided and preparing revised estimates of its cost/benefit analysis based on the additional detail provided. Embarq understands that it is currently contemplated that details for years 2008 and 2009 will be finalized through an ongoing process and review and that the parties are currently working to reach a stipulation on this process. To the extent that the Company's plan is revised as a

result of this proceeding, Embargo reserves the right to revise its position.

## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic and U.S. mail this 8<sup>th</sup> day of August, 2007, to the following:

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s/Susan S. Masterton

Susan S. Masterton