Marguerite Lockard

From:	Linda Boles
Sent:	Wednesday, October 17, 2007 3:20 PM
То:	Marguerite Lockard
Ce:	'Browne, Maria'; Keino Young; Lisa Bennett; Katherine Fleming; Rick Mann; Beth Keating; Nancy Sims; Susan Masterton; 'john.burnett@pgnmail.com'; 'de.oroark@verizon.com'; 'john_butler@fpl.com'; 'lwillis@ausley.com'; 'RAB@beggslane.com'; 'swright@yvlaw.net'; Adam Teitzman
Subject	:: Docket 070298

Marguerite, as I was finalizing the transcript in the above-referenced docket, I realized that the prefiled direct testimony of Mickey Harrelson was missing page 12. I contacted Maria Browne's office, who forwarded the prefiled testimony via e-mail in its entirety. I have printed the missing page 12 and inserted it into the transcript. I'm also forwarding a copy of Page 12 to you so that it can be filed and scanned in the Clerk's office.

Thanks, Linda Boles

DOCUMENT NUMBER-DATE

FPSC-COMMISSION CLERK

wind measuring devices and other data collection devices to study the performance of the various grades of construction. The Plan also calls for the conversion of 19 specific Interstate and major thoroughfare crossings from overhead lines to underground. In my opinion, these also qualify as EWL projects because they assure that the lines crossing these important highways will not fall into the road. My recommendation is that these highway crossings also be evaluated for the feasibility of applying storm guying to EWL standards as FPL and GULF plan to do with such crossings.

8 Q. Is the Company's Plan to adopt NESC EWL criteria only for Interstate and major 9 thoroughfare crossings and one distribution pilot project, a prudent, practical and cost 10 effective way to meet the Commission's objectives of ensuring electrical system reliability 11 and reducing storm restoration cost and outages?

12 A. Yes. First, I agree with Progress's overall conclusion that EWL is not the right 13 construction criteria to apply throughout its service territory. Second, I agree that it is 14 prudent, practical and cost effective to pilot EWL criteria on a feeder in Pinellas Co, and 15 to also test the performance of EWL construction using wind measuring devices. *See* 16 PEF's Resp. to Staff Interrog. No. 4; Progress August 7, 2007, Plan Supplement.

17 Q. Please explain why you believe that EWL is not the right construction criteria to apply
18 throughout Progress's service territory.

A. Progress's Plan to maintain its current standard of Grade C as a system-wide application is
prudent, practical and cost effective. Grade C construction, when properly maintained,
meets the NESC requirements for distribution facilities, while still ensuring a reliable,
storm-hardy system. As noted by Jason Cutliffe, on behalf of Progress Energy, "the EWL
standard would have no appreciable benefit for PEF's distribution poles with respect to
preventing wind-caused damage" and "other coastal utilities and utilities that experience
tornados, support the fact that the EWL standard has no appreciable wind damage

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