



February 1, 2008

VIA ELECTRONIC MAIL

Mr. John Baxter
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
jbaxter@psc.state.fl.us

Re: City of St. Petersburg Complaint #764779C; Undocketed

Dear Mr. Baxter:

Please find attached Progress Energy Florida, Inc.'s responses to Staff's data request regarding the above-referenced matter.

Thank you for your assistance with this matter. Should you have any questions, please call me at (727) 820-5184.

Sincerely,


John T. Burnett

JTB/lms
Attachments

**PROGRESS ENERGY FLORIDA, INC.'S RESPONSES TO DATA REQUEST
REGARDING THE CITY OF ST. PETERSBURG COMPLAINT #764779C**

Q1. Please provide a system map of the secondary line in dispute underneath Maximo Park in St. Petersburg.

Answer:

Please see Attachment A.

Q2. Where is the point of delivery for the secondary line in dispute underneath Maximo Park?

Answer:

The current point of delivery is at the customer-owned pole to which the relevant light fixture is attached.

Q3. Does Progress Energy have any copies of written agreements or recorded copies of oral agreements transferring ownership of the secondary line from the company to the City of St. Petersburg?

Answer:

No. Since the mid-1990's, PEF has not installed underground commercial service lines. Therefore, if an underground commercial service line was installed after that time, it was installed by the customer and is owned by the customer who installed it. In such a case, therefore, PEF would have no such agreements or records. If a service line was installed by PEF prior to that time, then PEF did not transfer ownership of that line to the customer that is served by that line. Rather, PEF maintains ownership of any such line until such time that the line fails. Once it fails, PEF informs the customer served by the failed line that the customer must install a new customer-owned service line just like any new customer taking service is required to do.

In this instance, the line in question was installed by PEF in 1982. Accordingly, PEF has maintained ownership of this line. At the time of a failure on this line, PEF follows the procedure outlined above: that is - PEF informs the customer of its obligation to install a new customer-owned service line just like any new customer taking service is required to do.

Q4. In changing Section III, Part D, Subsection 3 of the 2007 Requirements for Electric Service and Meter Installations Handbook, did Progress Energy receive formal Commission approval to no longer maintain existing commercial and industrial underground lines?

Answer:

No, because no such approval was required. As explained in response to Q3 above, PEF ceased installing and owning underground commercial service lines in the mid-1990s. Thus, all such services installed after that time are customer-owned. Despite this fact, PEF still receives calls from customers asking PEF to repair, replace and/or “maintain” underground commercial services even though PEF does not own them. The amendment to PEF’s 2007 Requirements for Electric Service and Meter Installations Handbook referenced above was made to simply clarify this point to customers- i.e. that PEF does not have responsibility for customer-owned equipment.

In instances where a customer is served by an underground commercial or industrial service line that PEF installed prior to 1994, PEF does not perform “maintenance” on those lines because there is not any sort of maintenance that is generally accepted by the electric industry that can be performed on those lines. Rather, the two options available for a failed underground service line are to repair the line if possible (e.g. in situations where the line is cut) or to replace it with a new line. As noted in response to Q3 above, when such a line fails, PEF temporarily restores service to a customer if possible and then informs the customer served by the failed line that the customer must install a new customer-owned service line just like any new customer taking service is required to do. This process is consistent with the one used in other similar situations such as in PSC Docket No. 961082-EI, Order No. PSC-96-1356-FOF-EI (approving a similar process for a change in service requirements regarding meter enclosures).

Q5. If so, please provide a copy of the FPSC letter, docket, or hearing where this occurred.

Answer:

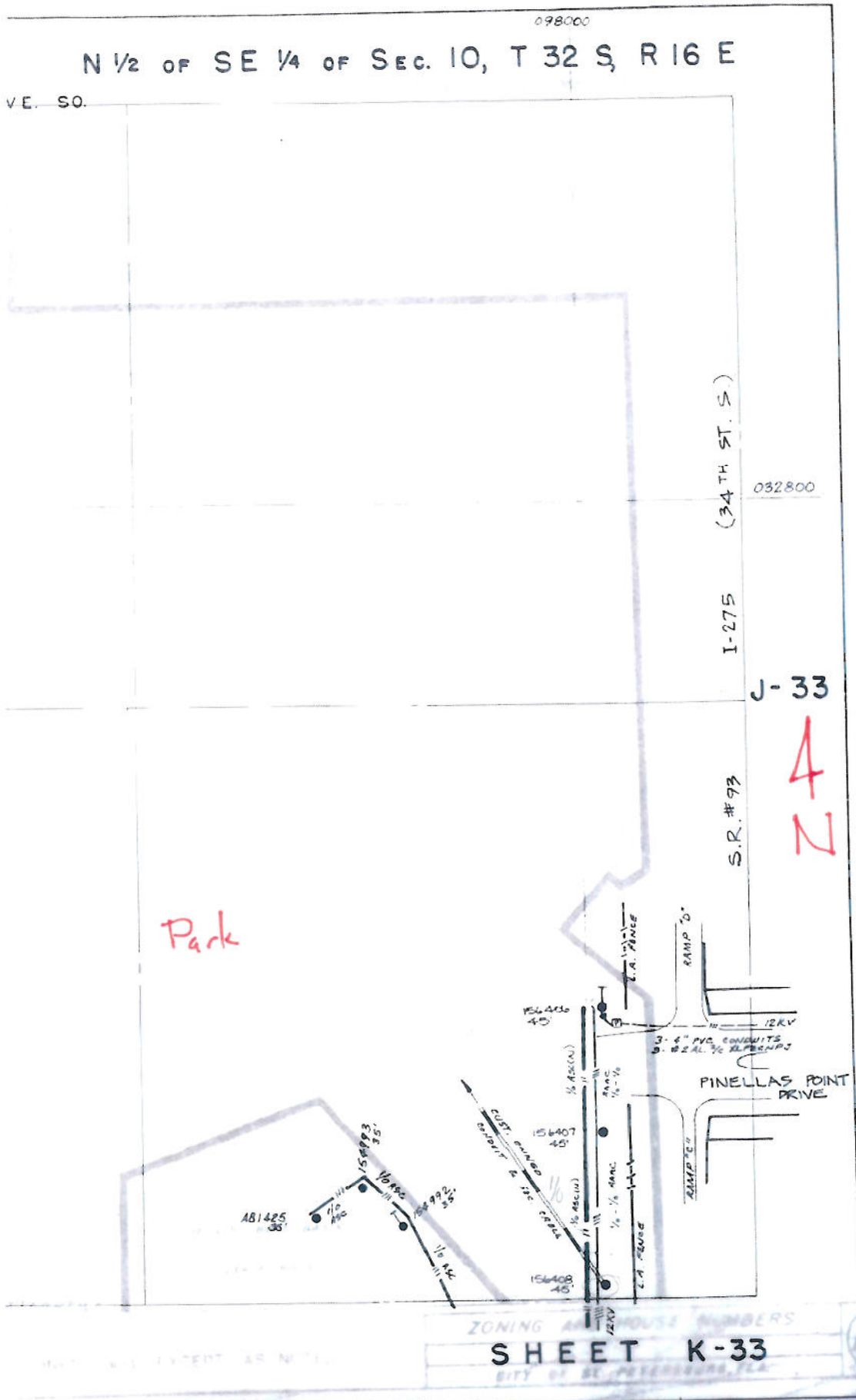
Not applicable. Please see PEF’s response to Q4 above.

Q6. If not, please explain why PEF believes adoption of this provision in its Requirements for Electric Service and Meter Installations does not violate Rule 25-6.037.

Answer:

Please see PEF’s response to Q4 above. Rule 25-6.037 requires PEF to maintain utility-owned equipment up to the customer’s point of delivery. If the equipment

in question is customer-owned and is beyond PEF's point of delivery, Rule 25-6.037 does not apply. If PEF owns the underground service line in question, then PEF follows the procedure outlined in PEF's responses to Q3 and Q4 above.



ZONING AND HOUSE NUMBERS
SHEET K-33
CITY OF ST. PETERSBURG, FLA.

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Approx. route of og service

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