



Florida Power & Light Company, 215 S. Monroe Street, Suite 810, Tallahassee, FL 32301

Scott Goorland
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
(561) 304-5633
(561) 691-7135 (Facsimile)

November 8, 2010

VIA HAND DELIVERY

Ms. Ann Cole
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

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COMMISSION
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Re: Docket No. 100266-EI – Review of 2010 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, F.A.C., submitted by Florida Power & Light Company

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Power & Light Company (“FPL”) are an original and 5 copies of FPL’s response to Staff’s Data Request dated November 1, 2010.

Please contact me should you or your Staff have any questions regarding this filing.

Sincerely,

Scott Goorland
Scott Goorland

Enclosure

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an FPL Group company

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Docket No. 100266-EI
November 1, 2010 FPSC Staff Data Request

Please refer to the 2nd set of revisions FPL would like to have made to the storm hardening recommendation.

1. **Please refer to Attachment F, Initiative 3- Six-Year Transmission Inspection Program. FPL states transmission pole inspections costs were \$4.8 M with \$43.6 M in follow-up work for 2006-2008.**

- a. **Please provide all supporting documentation for these costs.**

As reported in FPL's March Filing, <u>Storm Prep Initiative No. 3*</u>	(\$ Millions)			
	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>Total</u>
Inspections	1.4	1.4	2.0	4.8
Follow-up work – pole replacements	13.5	14.8	15.3	43.6

* These costs are documented in FPL's annual reliability/storm preparedness filings that were made in 2008-2010. For 2007 – see attached page 74 of FPL's March 2008 filing; for 2008 – see attached page 73 of FPL's March 2009 filing; and for 2009 – see attached page 56, FPL's March 2010 filing.

- b. **Did FPL mean to state 2007-2009 for transmission pole inspection and follow-up instead of 2006-2008?**

To clarify, the \$4.8M (inspections) and \$43.6M (follow-up work) were the total actual costs incurred in 2007-2009 (see a. above). However, all follow-up work identified through inspections in a given year is actually performed the following year. Therefore, the \$43.6M of follow-up work/pole replacements costs incurred during 2007-2009 were associated with follow-up work identified during the 2006-2008 inspections.

2. **Please refer to Attachment F, Initiative 4- Hardening of Existing transmission Structures. Please provide all supporting documentation for the total cost of 2007-2009 transmission hardening of \$16.4 M.**

As reported in FPL's March Filing, <u>Storm Prep Initiative No. 4*</u>	(\$ Millions)			
	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>Total</u>
Replace wood transmission structures	4.7	4.3	2.7	11.7
Ceramic post transmission line insulators	1.8	1.6	1.3	4.7
Total	6.5	5.9	4.0	16.4

* These costs are documented in FPL's annual reliability/storm preparedness filings that were made in 2008-2010. For 2007 - see attached page 78 of FPL's March 2008 filing; for 2008 – see attached page 77 of FPL's March 2009 filing; and for 2009 – see attached page 60, FPL's March 2010 filing.

3. **Where FPL states "Cost not provided," please provide actual cost for these initiatives.**

Initiative 2 Total costs for performing joint use pole attachment audits are not specifically tracked/budgeted by FPL. For example, joint use poles are inspected as part of FPL's system-wide eight-year pole inspection program. While FPL captures total inspection

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costs associated with this program, its does not distinguish these costs between joint use poles and non-joint use poles.

Initiative 4 Transmission hardening costs for 2010 were not specifically budgeted by FPL, as discussed on page 60 (attached) of FPL's March 2010 filing.

Initiative 8 Costs associated with FPL's storm preparation coordination efforts with local governments (e.g., conducting joint meetings, quarterly e-mail communications to city/county governments, monthly newsletters, Community Outreach presentations, etc.) are not specifically tracked/budgeted. FPL does not track these specific types of costs as they are usually combined with other on-going local government issues/discussions.

Initiative 9 For 2007-2009, FPL's allocated costs (costs are shared among the project sponsors) associated with the PURC's collaborative research on hurricane hardening were approximately \$205K. For 2010, FPL's allocated costs are estimated to be \$5K.

Wood Transmission Structure Inspections

	2009		2009		2010	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Total number of wood transmission poles.	n/a	21,716	n/a	n/a	18,510	n/a
(B) Number of transmission poles strength tested. (C)	3,605	5,827	\$2.0M*	\$2.0M*	2,677	\$1.8M*
(C) Number of transmission poles passing strength test.	n/a	4,267	n/a	n/a	n/a	n/a
(D) Number of transmission poles failing strength test (overloaded).	n/a	10	n/a	n/a	10	n/a
(E) Number of transmission poles failing strength test (other reasons).	n/a	581	n/a	n/a	n/a	n/a
(F) Number of transmission poles corrected (strength failure).	13	13	\$0.0M	n/a	n/a	n/a
(G) Number of transmission poles corrected (other reasons).	581	581	\$0.0M	n/a	684	n/a
(H) Total transmission poles replaced.	594	3,206**	\$14.8M ***	\$15.3M ***	694	\$20.0M** *

* FPL does not budget or track expenditures based on structure materials. As such, the dollar amounts shown in the table above represent all transmission structure inspections regardless of materials.

** The replacement quantities shown in the table above represents the total of transmission structures replaced not only through its condition assessment program, but also from relocations, proactive rebuilds, and system expansion.

*** The dollar amounts shown are only for FPL's condition assessment follow-up program.

Appendix

Appendix 1: FPSC Table: Transmission Hardening

Single Pole Un-Guyed Wood Transmission Structures

	2009		2009		2010	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Transmission structures scheduled for hardening.	n/a	n/a	\$2.7M*	n/a	n/a	n/a
(B) Transmission structures hardening completed.	n/a	483	n/a	\$2.7M*	n/a	n/a
(C) Percent transmission structures hardening completed.	n/a	n/a	n/a	100%	n/a	n/a

In 2006, FPL's began its Transmission hardening initiative by targeting replacement of single pole un-guyed wood structures. In 2008, FPL enhanced its hardening initiative to include replacement of all wood transmission structures over the next 25 to 30 years. This year will be the last time FPL reports on the single pole un-guyed wood pole program as these structures will be incorporated in the enhanced initiative.

Replace All Wood Transmission Structures

	2009		2009		2010	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Transmission structures scheduled for hardening.	944	n/a	n/a	n/a	694**	n/a**
(B) Transmission structures hardening completed.	n/a	3,206	n/a	n/a	n/a	n/a
(C) Percent transmission structures hardening completed.	n/a	340%	n/a	n/a	n/a	n/a

Ceramic Post Transmission Line Insulators

	2009		2009		2010	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Transmission structures scheduled for hardening.	392	n/a	\$1.3M	n/a	72	n/a*
(B) Transmission structures hardening completed.	n/a	1,055	n/a	\$1.3M	n/a	n/a
(C) Percent transmission structures hardening completed.	n/a	269%	n/a	100%	n/a	n/a

*Even though FPL has established in 2007 budget items for both transmission hardening programs and will be able to track expenditures within these specific budget activities, it will not be able to separate costs for these types of improvement made within other normal business activities such as maintenance, relocations, proactive rebuilds, and system expansion.

** These wood poles will be replaced with concrete /steel structures during our maintenance activities, therefore no budget is shown.

Wood Transmission Structure Inspections

	2008		2008		2009	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Total number of wood transmission poles.	n/a	23,682	n/a	n/a	20,772	n/a
(B) Number of transmission poles strength tested. (C)	3,931	4,908	\$1.58M*	\$1.44M*	3,605	\$1.8M to \$2.0M*
(C) Number of transmission poles passing strength test.	n/a	4,267	n/a	n/a	n/a	n/a
(D) Number of transmission poles failing strength test (overloaded).	n/a	14	n/a	n/a	n/a	n/a
(E) Number of transmission poles failing strength test (other reasons).	n/a	627	n/a	n/a	n/a	n/a
(F) Number of transmission poles corrected (strength failure).	13	13	\$0.0M	n/a	14	n/a
(G) Number of transmission poles corrected (other reasons).	581	581	\$0.0M	n/a	653	n/a
(H) Total transmission poles replaced.	594	1968**	\$13.1M ***	\$14.8M ***	667	\$14.8M***

* FPL does not budget or track expenditures based on structure materials. As such, the dollar amounts shown in the table above represent all transmission structure inspections regardless of materials.

** The replacement quantities shown in the table above represents the total of transmission structures replaced not only through its condition assessment program, but also from relocations, proactive rebuilds, and system expansion.

*** The dollar amounts shown are only for FPL's condition assessment follow-up program.

Wood Transmission Structure Inspections

	2007		2007		2008	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Total number of wood transmission poles.	n/a	23,682	n/a	n/a	n/a	n/a
(B) Number of transmission poles strength tested. (C)	4,237	3,535****	\$1.3M*	\$1.4M*	3,955	\$1.7M to \$1.89M*
(C) Number of transmission poles passing strength test.	n/a	2,941	n/a	n/a	n/a	n/a
(D) Number of transmission poles failing strength test (overloaded).	n/a	13	n/a	n/a	n/a	n/a
(E) Number of transmission poles failing strength test (other reasons).	n/a	581	n/a	n/a	n/a	n/a
(F) Number of transmission poles corrected (strength failure).	9	9	\$0.0M**	n/a	13	n/a
(G) Number of transmission poles corrected (other reasons).	352	352	\$0.0M**	n/a	581	n/a
(H) Total transmission poles replaced.	361	1471**	\$12.2M***	\$13.5M***	594	\$12.3M***

* FPL does not budget or track expenditures based on structure materials. As such, the dollar amounts shown in the table above represent all transmission structure inspections regardless of materials.

** The replacement quantities shown in the table above represents the total of transmission structures replaced not only through its condition assessment program, but also from relocations, proactive rebuilds, and system expansion.

*** The dollar amounts shown are only for FPL's condition assessment follow-up program.

**** Inspected more concrete / steel structures to meet 6-year requirement.

Appendix

Appendix 1: FPSC Table: Transmission Hardening

Single Pole Un-Guyed Wood Transmission Structures

	2008		2008		2009	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Transmission structures scheduled for hardening.	294	467	\$4.38M*	\$4.28M*	n/a	n/a
(B) Transmission structures hardening completed.	294	467	\$4.38M*	\$4.28M*	n/a	n/a
(C) Percent transmission structures hardening completed.	100%	165%	100%	97.7%	n/a	n/a

In 2006, FPL's began its Transmission hardening initiative by targeting replacement of single pole un-guyed wood structures. In 2008, FPL enhanced its hardening initiative to include replacement of all wood transmission structures over the next 25 to 30 years. This year will be the last time FPL reports on the single pole un-guyed wood pole program as these structures will be incorporated in the enhanced initiative.

Replace All Wood Transmission Structures

	2008		2008		2009	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Transmission structures scheduled for hardening.	n/a	1966	n/a	n/a	944	\$12M*
(B) Transmission structures hardening completed.	n/a	1966	n/a	n/a	944	\$12M*
(C) Percent transmission structures hardening completed.	n/a	100%	n/a	n/a	100%	100%

Ceramic Post Transmission Line Insulators

	2008		2008		2009	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Transmission structures scheduled for hardening.	445	593	\$1.8M	\$1.6M	392	\$1.3M
(B) Transmission structures hardening completed.	445	593	\$1.8M	\$1.6M	392	\$1.3M
(C) Percent transmission structures hardening completed.	100%	133%	100%	89%	100%	100%

*Even though FPL has established budget items for both transmission hardening programs and will be able to track expenditures within these specific budget activities, it will not be able to separate costs for these types of improvement made within other normal business activities such as maintenance, relocations, proactive rebuilds, and system expansion.

Appendix

Appendix 1: FPSC Table: Transmission Hardening

Single Pole Un-Guyed Wood Transmission Structures

	2007		2007		2008	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Transmission structures scheduled for hardening.	282	339	\$5.1M*	\$4.67M*	229**	\$4.38M**
(B) Transmission structures hardening completed.	282	339	\$5.1M**	\$4.67M**	229**	\$4.38M**
(C) Percent transmission structures hardening completed.	100%	120%	100%	92%	100%	100%

* In 2007, FPL established separate budget items for both transmission hardening programs and will be able to track expenditures within these specific budget activities; however, it will not be able to identify and track expenditures for these types of improvements made within other normal business activities such as maintenance, relocations, proactive rebuilds, and system expansion.

** In 2008, FPL will budget \$4.38M to replace 229 SPUWs under the SPUW hardening program. Additional SPUW's will be budgeted and replaced under other programs. FPL will not be able to identify and track expenditures for these additional SPUWs made within other normal business activities such as maintenance, relocations, proactive rebuilds, and system expansion.

Ceramic Post Transmission Line Insulators

	2007		2007		2008	
	Goal	Actual	Budget	Actual	Goal	Budget
(A) Transmission structures scheduled for hardening.	467	773	\$2.2M**	\$1.84M	445	\$1.8M
(B) Transmission structures hardening completed.	467	773	\$2.2M**	\$1.84M	445	\$1.8M
(C) Percent transmission structures hardening completed.	100%	166%	100%	84%	100%	100%

** In 2007, FPL established separate budget items for both transmission hardening programs and will be able to track expenditures within these specific budget activities; however, it will not be able to identify and track costs for these types of improvements made within other normal business activities such as maintenance, relocations, proactive rebuilds, and system expansion.