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April 18, 2014

**-VIA ELECTRONIC FILING –**

Ms. Carlotta S. Stauffer  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

**Re: FPL Petition for Change to Pole Inspection and Load Assessment Requirements  
of Order PSC-06-0144-PAA-EI**

Dear Ms. Stauffer:

I enclose for electronic filing in the above docket Florida Power & Light Company's Petition for Change to Pole Inspection and Load Assessment Requirements of Order PSC-06-0144-PAA-EI, together with Exhibits A and B to the Petition.

If there are any questions regarding this transmittal, please contact me at (561) 304-5633.

Sincerely,

*s/ Scott A. Goorland*  
Scott A. Goorland

Enclosure

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light )  
Company’s Petition for Change )  
to pole inspection and load )  
assessment requirements of )  
Order PSC-06-0144-PAA-EI )  
\_\_\_\_\_ )

Docket No. \_\_\_\_\_

Filed: April 18, 2014

**PETITION OF FLORIDA POWER & LIGHT  
COMPANY FOR CHANGE TO POLE INSPECTION AND  
LOAD ASSESSMENT REQUIREMENTS OF ORDER PSC-06-0144-PAA-EI**

**NOW, BEFORE THIS COMMISSION**, through undersigned counsel, comes Florida Power & Light Company (“FPL” or the “Company”), and pursuant to Sections 366.04 and 366.05, Florida Statutes, hereby petitions for approval of changes from the requirements of Order No. PSC-06-0144-PAA-EI, in Docket No. 060078-EI (issued February 27, 2006). Specifically, FPL requests: 1) a change in the exemption approved by the Commission in Order No. PSC-08-0615-PAA-EI, in Docket No. 080219-EI (issued September 23, 2008), from the requirement to excavate for inspections of Chromium Copper Arsenate (“CCA”) poles that are less than 16 years of age, so that the exemption applies to poles that are less than 28 years of age; and 2) an exemption from the requirement to perform strength impact (“load”) assessments during FPL’s second eight-year pole inspection cycle (2014-2021) on any pole that had a load assessment test result during the first eight-year inspection cycle of less than 80% of full load. In support of the Petition, FPL states as follows:

1. The name and address of the Petitioner is:  
  
Florida Power & Light Company  
700 Universe Blvd  
Juno Beach, FL 33408

2. Any pleading, motion, notice, order or other document required to be served upon the petitioner or filed by any party to this proceeding should be served upon the following individuals:

Kenneth A. Hoffman Vice President, Regulatory Affairs Florida Power & Light Company 215 South Monroe Street, Suite 810 Tallahassee, FL 32301 Phone: 850-521-3919 Fax: 850-521-3939 Email: ken.hoffman@fpl.com	Scott A. Goorland Principal Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 Phone: 561-304-5639 Fax: 561-691-7135 Email: scott.goorland@fpl.com
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3. The Florida Public Service Commission (“Commission”) has jurisdiction pursuant to Sections 366.04, 366.05, Florida Statutes.

4. FPL is a corporation organized and existing under the laws of the State of Florida and is an electric utility as defined in § 366.02(2), F.S.

5. This Petition is being filed consistent with Rule 28-106.201, Florida Administrative Code. The agency affected is the Commission, located at 2540 Shumard Oak Boulevard, Tallahassee, FL 32399. This case does not involve reversal or modification of an agency decision or an agency’s proposed action. Therefore, subparagraph (c) and portions of subparagraphs (b), (e), (f) and (g) of subsection (2) of that rule are not applicable to this Petition. In compliance with subparagraph (d), FPL states that it is not known which, if any, of the issues of material fact set forth in the body of this Petition may be disputed by any others who may plan to participate in this proceeding. The discussion below demonstrates how the petitioner’s substantial interests will be affected by the agency determination.

## I. Background

6. Order No. PSC-06-0144-PAA-EI required each electric investor-owned utility (“IOU”) to implement an eight-year wood pole inspection cycle and submit annual reports.

Specifically, each IOU was ordered to:

- 1) Implement an eight-year wood pole inspection program utilizing the sound and bore technique for all wood poles;
- 2) Include excavation of all Southern Pine poles and other pole types as appropriate per Rural Utilities Service (RUS) Bulletin 1730B-121;
- 3) Perform strength impact/load assessments on poles with attachments added since original pole installation, if records of such pole attachment strength impact assessments are not maintained after the time of original pole installation; and,
- 4) File annual pole inspection reports with the Division of Economic Regulation by March 1 of each year.

7. The Commission also ordered each IOU to submit a comprehensive wood pole inspection plan to the Commission’s Director of Economic Regulation by April 1, 2006. For these plans, each utility was required to include:

*“...its plan for pole-specific data gathering, pole inspection program enforcement, and collocated poles inspections (how poles shared by two or more companies will be inspected). The plans shall also identify any pole inspection standards utilized by the electric IOU that supersede those of the NESC and any other details necessary to understand its pole inspection program.”*

Order No. PSC-06-0144-PAA-EI, at page 9.

8. The Commission noted that flexibility was necessary to afford each IOU the ability to deal with individual circumstances, stating:

*“The Commission recognizes that each IOU may face utility-specific circumstances. It is therefore appropriate to afford some flexibility in the manner in which the individual IOU plans implement the requirements of this order ... To the extent that any IOU’s plan deviates in any material respect from the requirements of this order, staff is directed to present its recommendation regarding the plan to the Commission for further consideration in light of the utility’s specific circumstances.”*

Order No. PSC-06-0144-PAA-EI, at page 9.

9. FPL's Wood Pole Inspection Plan was submitted on March 31, 2006.

10. On August 3, 2006, the Commission initiated Docket No. 060531-EU to review material deviations from the requirements of Order No. PSC-06-0144-PAA-EI contained within the IOU wood pole inspection plans. During that review, the Commission found that some of the IOUs' wood pole inspection plans contained certain deviations from the recommended excavation process. Specific to CCA poles, the Commission found that Gulf Power Company ("Gulf") proposed to perform no excavation in its inspections of CCA poles under 15 years old.

11. In Order No. PSC-07-0078-PAA-EU, Docket No. 060531-EU (issued January 29, 2007), at pages 5 and 6, the Commission reviewed and approved Gulf's proposed deviation:

*"In Order No.PSC-06-0778-PAA-EU, we found that Gulf's plan "deviates from the Order in that it does not include excavation of CCA poles under 15 years old." Subsequently, Gulf provided additional data and has augmented its inspection program to include excavation for a sample of an estimated 330 CCA poles under15 years of age."*

*"Gulf states that its criterion for not excavating around CCA poles under 15 years old is based on an inspection matrix that was developed with the close cooperation of Gulf's pole inspection contractor, Osmose, Inc. Gulf submitted data from its contractor to support the inspection matrix used at Gulf, specifically for CCA poles."*

*"According to Gulf, Osmose's study of the data revealed that rejection of CCA poles began with poles in the 16-20 year age group, hence Gulf established the age criterion (15 years old) for excavation."*

*"We find that Gulf has reasonably addressed this deviation cited in Order No. PSC-06-0778-PAA-EU that its inspection program does not include full excavation around CCA wood poles under 15 years of age. This criterion appears to be based on Osmose's study of the data compiled from the inspection of poles inspected from 2002 - 2005 in Southeastern states. As part*

*of our annual review, we will analyze data from Gulf and other utilities to assess whether a lower age criterion/or full excavation is warranted.”*

As a result, Gulf does not have to excavate around CCA poles under 15 years of age as part of its wood pole inspection process.

12. Based on data available at the time, in 2008 FPL, in conjunction with Progress Energy Florida (now Duke Energy Florida) and Tampa Electric Company (the “Joint Petitioners”) sought similar approval by the Commission to exclude excavation from their inspection process for CCA poles that are less than 16 years of age (i.e., up to and including 15 years of age). The data showed that, as was the case with Gulf, there was a significantly lower rejection rate for CCA poles that were less than 16 years of age, compared to the rejection rates for older CCA poles. Accordingly, excavating CCA poles under the age of 16 was not significantly beneficial to the purpose of the pole inspection program yet contributed substantially to the cost of the program. Therefore, the Joint Petitioners proposed to discontinue excavation and sound and bore inspections on all CCA poles under the age of 16. Visual inspections and overload analyses would still be performed on all CCA poles regardless of age. The Joint Petitioners later agreed to modify their request to propose to continue sound and bore inspections for all CCA poles under the age of 16, but to eliminate the requirement to perform full excavation on these poles, and instead perform excavation sampling on these poles. The Commission approved the Joint Petitioners’ modified request. Order No. PSC-08-0615-PAA-EI, Docket No. 080219-EI (issued September 23, 2008).

## **II. FPL’s Proposed Extension of the CCA Inspection Exemption**

13. FPL’s approved exemption on excavation was based on data available at that time which showed that the rejection rate for poles under the age of 16 was 0.08%. As a result of

completing its first eight-year pole inspection cycle from 2006-2013, FPL now has significantly more data on CCA pole failures. This new data indicates that CCA poles up to the age of 28 have the same low failure rate of 0.08% that FPL originally measured for poles under the age of 16.

14. Based on this new information, FPL requests an expansion of the exemption approved by the Commission in Order No. PSC-08-0615-PAA-EI from the requirement to excavate for inspections of CCA poles, so that the exemption applies to poles that are less than 28 years of age. Under this exemption, FPL would not be required to excavate for inspections of CCA poles that are less than 28 years of age. Exhibit A to this Petition supports FPL's request, and provides a summary of FPL's findings on CCA poles from FPL's first eight-year cycle.

15. FPL projects an incremental savings of approximately \$1.0 million annually, or \$8.1 million over the eight-year cycle, as a result of this deviation from its pole inspection excavation requirements. By visually inspecting as well as performing excavation and sound and bore inspections on all CCA poles over the age of 27, FPL will continue to maintain a high standard for CCA pole integrity.

### **III. Pole Load Assessments**

16. Order No. PSC-06-0144-PAA-EI requires FPL to conduct pole load assessments on an eight-year cycle to appropriately account for pole attachment impacts. FPL currently performs load assessment tests on all poles in order to determine if they meet the allowable load required by NESC standards. For the reasons described below, FPL requests an exemption from Order No. PSC-06-0144-PAA-EI, so that it would not be required to perform load assessments during its second eight-year pole inspection cycle (2014-2021) on

any pole for which the load assessment performed during the first eight-year inspection cycle (2006-2013) showed that the pole was loaded to less than 80% of its full load.

17. During FPL's first eight-year cycle, it was appropriate to perform load assessment tests on all poles because FPL did not yet have a consistent and comprehensive base of data on the existing loading of its poles. However, as a result of the data gathered in the initial eight-year pole inspection cycle inspection test results, together with analyses conducted in support of this request, FPL has determined that (1) the vast majority of FPL's poles were not close to their 100% loading, (2) the risk associated with not conducting load assessments during FPL's second eight-year cycle on poles which were previously determined to be loaded at below 80% of full loading is extremely low; and (3) significant cost savings will be realized.

18. To support this request FPL selected a statistically valid random sample of 384 poles from across its system that were load assessed during the first eight-year cycle. A sample size of 384 for the population produces a result with a 95% confidence level. The results of this sample are contained in Exhibit B to this Petition. As shown in Exhibit B, not a single one of the 328 poles that was tested at less than 80% of full load in the first cycle now exceeds full load – with the vast majority of these testing significantly lower than 80% of full load.

19. FPL projects an incremental savings of approximately \$528,000 annually or approximately \$4.2 million over the full second eight-year pole inspection cycle for this load assessment test exemption. By continuing to perform load assessment tests on all poles with an initial load assessment test of 80% of full load or greater, FPL will continue to ensure its poles are at safe load levels.

WHEREFORE, FPL respectfully requests the Commission to enter an order granting this petition and approving of the following two changes from the requirements of Order No. PSC-06-0144-PAA-EI: 1) a change in the exemption approved by the Commission in Order No. PSC-08-0615-PAA-EI, from the requirement to excavate for inspections of Chromium Copper Arsenate (“CCA”) poles that are less than 16 years of age, so that the exemption applies to poles that are less than 28 years of age; and 2) an exemption from the requirement to perform strength impact (“load”) assessments during FPL’s second eight-year inspection cycle on any pole that had a load assessment test result during the first eight-year inspection cycle of less than 80% of full load.

**DATED** this 18<sup>th</sup> day of April, 2014.

FLORIDA POWER & LIGHT COMPANY

/s/ Scott A. Goorland

R. Wade Litchfield  
Vice President and General Counsel  
John T. Butler  
Assistant General Counsel – Regulatory  
Scott A. Goorland  
Principal Attorney  
Florida Power & Light Company  
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Juno Beach, FL 33408-0420  
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# **EXHIBIT A**

## EXHIBIT A

### FLORIDA POWER & LIGHT COMPANY CCA POLE EXCAVATION FAILURES

#### INITIAL CCA POLE INSPECTION RESULTS (2006-2007)

AGE (YEARS)	CCA POLES INSPECTED	CUMULATIVE FAILED INSPECTION	% OF TOTAL
<b>&lt;16</b>	<b>34,856</b>	<b>28</b>	<b>0.08%</b>

Above from Page 5, July 17, 2008 Staff Recommendation

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#### UPDATED CCA POLE INSPECTION RESULTS: 2006-2013

AGE (YEARS)	CCA POLES INSPECTED	CUMULATIVE FAILED INSPECTION	% OF TOTAL
<b>&lt;28</b>	<b>565,139</b>	<b>455</b>	<b>0.08%</b>

FPL's updated inspection results (2006-2013) indicate that CCA poles <28 years old failed at the same low rate as the CCA poles <16 years old in FPL's initial 2006-2007 analysis.

# **EXHIBIT B**

**EXHIBIT B**  
**FLORIDA POWER LIGHT CO.**  
**<80% LOAD SAMPLE**

SUBSTATION	COUNTY	FEEDER	Original Inspection Date	Original GRADE B	Pilot Study GRADE B	Pilot Study <100% = Pass & >100% = Fail
GARDEN	MIAMI-DADE	4139	06/2009	7	16	PASS
COCONUT GROVE	MIAMI-DADE	437	10/2009	8	42	PASS
ORTIZ	LEE	3864	04/2009	8	42	PASS
CLARK	SARASOTA	538	08/2007	13	22	PASS
OLYMPIA HEIGHT	DADE	8931	08/2007	13	20	PASS
LITTLE RIVER	MIAMI-DADE	635	07/2012	14	18	PASS
BULOW	FLAGLER	2034	10/2011	14	15	PASS
COLUMBIA	COLUMBIA	1135	03/2008	15	17	PASS
ORANGETREE	COLLIER	7363	03/2010	16	20	PASS
MASTER	MIAMI-DADE	5532	05/2010	16	32	PASS
CORAL REEF	MIAMI-DADE	5836	01/2010	16	15	PASS
CATCHMENT	PALM BEACH	9762	12/2011	16	19	PASS
CRANE	MARTIN	7161	09/2009	17	21	PASS
SHERMAN	OKEECHOBEE	6063	04/2011	17	28	PASS
COX	BREVARD	7062	02/2011	18	18	PASS
TOMOKA	VOLUSIA	6062	06/2012	18	21	PASS
MCCALL	CHARLOTTE	7961	08/2011	18	35	PASS
ALLIGATOR	COLLIER	3569	08/2007	18	25	PASS
CHAPEL	BROWARD	6964	08/2011	18	21	PASS
DELTONA	VOLUSIA	4063	12/2012	19	30	PASS
SATELLITE	BREVARD	4131	04/2007	19	8	PASS
ST JOE	FLAGLER	2364	02/2009	19	19	PASS
PRINGLE	FLAGLER	10361	07/2011	19	20	PASS
ACREAGE	PALM BEACH	6767	12/2007	19	21	PASS
MCMEEKIN	PUTNAM	533	10/2010	19	23	PASS
MIAMI	MIAMI-DADE	145	05/2008	19	28	PASS
TAYLOR	VOLUSIA	4836	05/2010	19	18	PASS
FLAGLER BEACH	FLAGLER	1462	07/2007	19	35	PASS
WOODLANDS	BROWARD	3232	10/2007	19	76	PASS
MACCLENNY	BAKER	961	07/2008	20	23	PASS
ACREAGE	PALM BEACH	6762	11/2007	20	23	PASS
COPANS	BROWARD	5631	07/2008	20	28	PASS
CLEVELAND	CHARLOTTE	4433	02/2010	20	24	PASS
HOLLY HILL	VOLUSIA	1036	04/2008	20	30	PASS
HOLLY HILL	VOLUSIA	1037	05/2008	20	27	PASS
PEMBROKE	BROWARD	2433	03/2008	20	19	PASS
ULETA	MIAMI-DADE	6331	11/2011	21	21	PASS
MURDOCK	CHARLOTTE	2064	12/2009	21	21	PASS
LIVE OAK	SUWANNEE	632	04/2010	21	23	PASS
SISTRUNK	BROWARD	139	03/2007	22	23	PASS
MACCLENNY	BAKER	963	05/2010	22	28	PASS
LOXAHATCHEE	PALM BEACH	7665	05/2012	22	23	PASS
SOUTH BAY	PALM BEACH	3633	08/2010	22	21	PASS
62ND AVE	DADE	1731	04/2007	22	26	PASS
CHULUOTA	SEMINOLE	7262	07/2009	23	28	PASS
REGIS	FLAGLER	6364	04/2012	23	40	PASS
REGIS	FLAGLER	6364	04/2012	23	40	PASS
ORANGETREE	COLLIER	7361	05/2012	23	31	PASS
SOUTH BAY	PALM BEACH	3632	08/2010	23	27	PASS

**EXHIBIT B  
FLORIDA POWER LIGHT CO.  
<80% LOAD SAMPLE**

SUBSTATION	COUNTY	FEEDER	Original Inspection Date	Original GRADE B	Pilot Study GRADE B	Pilot Study <100% = Pass & >100% = Fail
MIAMI SHORES	MIAMI-DADE	3440	10/2010	23	26	PASS
ORTIZ	LEE	3864	04/2009	23	22	PASS
LABELLE	HENDRY	2464	01/2010	23	21	PASS
SHERMAN	MARTIN	6063	05/2011	23	31	PASS
OKEECHOBEE	OKEECHOBEE	1636	06/2008	23	20	PASS
ADAMS	ST LUCIE	8462	01/2012	23	29	PASS
PAYNE	SARASOTA	2832	10/2008	24	34	PASS
SCOTTSMOOR	BREVARD	5061	07/2011	24	38	PASS
HIELD	BREVARD	8165	01/2012	24	45	PASS
MELBOURNE	BREVARD	535	03/2007	24	43	PASS
SAN MATEO	PUTNAM	8431	02/2012	24	32	PASS
MCMEEKIN	PUTNAM	531	10/2010	24	41	PASS
MILAM	MIAMI-DADE	8164	02/2010	24	27	PASS
LAUREL	SEMINOLE	831	12/2008	25	41	PASS
COCOA	BREVARD	434	10/2008	25	45	PASS
PALATKA	PUTNAM	431	05/2009	25	25	PASS
CAPRI	COLLIER	4061	02/2008	25	24	PASS
MIMS	BREVARD	2232	09/2009	25	22	PASS
PANACEA	SARASOTA	8864	11/2009	25	26	PASS
TARTAN	PALM BEACH	7864	04/2011	25	30	PASS
MARGATE	BROWARD	2262	12/2009	25	31	PASS
HOLLY HILL	VOLUSIA	1036	04/2008	25	50	PASS
STARKE	BRADFORD	3161	10/2012	25	26	PASS
PACIFIC	ALACHUA	3732	10/2008	25	23	PASS
HOLLYWOOD	BROWARD	240	06/2010	25	24	PASS
PHILLIPPI	SARASOTA	3037	05/2009	26	36	PASS
REGIS	FLAGLER	6362	09/2012	26	40	PASS
GLADEVIEW	MONROE	2236	01/2011	26	28	PASS
GARDEN	MIAMI-DADE	4141	07/2009	26	36	PASS
BULOW	VOLUSIA	2033	11/2011	26	21	PASS
SABAL	ST LUCIE	8761	01/2010	26	31	PASS
HOLLYBROOK	BROWARD	6168	07/2009	26	37	PASS
ADAMS	ST LUCIE	8462	12/2011	26	34	PASS
MURDOCK	CHARLOTTE	2065	05/2010	26	26	PASS
TUTTLE	SARASOTA	4533	12/2008	27	31	PASS
CHULUOTA	SEMINOLE	7261	02/2012	27	37	PASS
MCMEEKIN	PUTNAM	531	10/2010	27	36	PASS
AVOCADO	MIAMI-DADE	10063	03/2012	27	30	PASS
TRAIL RIDGE	CLAY	1331	10/2007	27	33	PASS
GATLIN	SAINT LUCIE	10463	08/2012	27	20	PASS
HOLLYBROOK	BROWARD	6166	09/2007	27	32	PASS
LABELLE	HENDRY	2461	05/2012	28	38	PASS
SOUTHSIDE	BROWARD	5531	09/2007	29	43	PASS
SYKES CREEK	BREVARD	1731	05/2007	29	40	PASS
COVE	MARTIN	8264	01/2012	29	38	PASS
ROSS	PALM BEACH	8161	09/2007	29	40	PASS
FOUNTAIN	PALM BEACH	5633	09/2009	29	13	PASS
TARTAN	PALM BEACH	7864	04/2011	29	34	PASS
NASH	COLUMBIA	6131	03/2009	29	35	PASS

**EXHIBIT B**  
**FLORIDA POWER LIGHT CO.**  
**<80% LOAD SAMPLE**

SUBSTATION	COUNTY	FEEDER	Original Inspection Date	Original GRADE B	Pilot Study GRADE B	Pilot Study <100% = Pass & >100% = Fail
VERENA	BROWARD	637	04/2010	30	56	PASS
YULEE	NASSAU	1463	06/2011	30	42	PASS
DEERFIELD BEAC	BROWARD	3531	01/2011	30	41	PASS
STARKE	BRADFORD	3161	10/2012	30	43	PASS
INDIAN RIVER	BREVARD	2131	11/2012	30	36	PASS
PALM BAY	BREVARD	1633	11/2007	31	28	PASS
REGIS	FLAGLER	6364	04/2012	31	37	PASS
COVE	MARTIN	8264	10/2011	31	34	PASS
QUANTUM	PALM BEACH	7936	09/2012	31	33	PASS
COUNTRY CLUB	MIAMI-DADE	5934	01/2008	31	46	PASS
ULETA	MIAMI-DADE	6340	02/2012	31	50	PASS
DEEPCREEK	CHARLOTTE	6363	04/2008	31	32	PASS
SAN MATEO	PUTNAM	8432	09/2009	31	38	PASS
MCCALL	CHARLOTTE	7962	09/2011	31	31	PASS
BRADENTON	MANATEE	234	02/2007	32	38	PASS
COLLEGE	SEMINOLE	4634	02/2008	32	63	PASS
SCOTTSMOOR	BREVARD	5061	06/2011	32	34	PASS
RIVERTON	ST JOHNS	5762	04/2011	32	31	PASS
MARION	MIAMI-DADE	2734	02/2008	32	39	PASS
WESTWARD	PALM BEACH	4037	01/2008	32	41	PASS
SEBASTIAN	INDIAN RIVER	5761	07/2007	32	39	PASS
PALM BAY	BREVARD	1632	07/2007	33	40	PASS
ACME	PALM BEACH	5265	06/2007	33	51	PASS
ORANGETREE	COLLIER	7361	08/2012	33	40	PASS
JASMINE	MIAMI-DADE	10566	04/2012	33	24	PASS
COLONIAL	LEE	2636	01/2011	33	39	PASS
NOTRE DAME	CHARLOTTE	6862	11/2011	33	41	PASS
BARNA	BREVARD	6931	10/2012	33	26	PASS
WESTWARD	PALM BEACH	4034	01/2008	33	49	PASS
ROSS	PALM BEACH	8169	09/2010	34	47	PASS
ORANGETREE	COLLIER	7364	07/2012	34	40	PASS
TITUSVILLE	BREVARD	333	04/2008	34	33	PASS
WESTON VILLAGE	MIAMI-DADE	7832	08/2008	34	38	PASS
DEEPCREEK	CHARLOTTE	6361	04/2008	34	76	PASS
LABELLE	HENDRY	2461	05/2012	34	40	PASS
SHERMAN	OKEECHOBEE	6063	04/2011	34	42	PASS
ADAMS	ST LUCIE	8461	12/2008	35	28	PASS
HARRIS	BREVARD	3635	01/2008	36	49	PASS
WIREMILL	BAKER	1562	11/2012	36	34	PASS
ACME	PALM BEACH	5264	08/2008	36	45	PASS
FRANKLIN	SARASOTA	6465	03/2010	36	30	PASS
ESTERO	LEE	3966	05/2009	36	93	PASS
COPANS	BROWARD	5635	11/2009	36	44	PASS
HOMELAND	PALM BEACH	8666	09/2011	37	33	PASS
SOUTH BAY	PALM BEACH	3632	09/2010	37	59	PASS
INTERNATIONAL	MIAMI-DADE	10264	05/2008	37	43	PASS
ALEXANDER	PALM BEACH	8561	12/2007	37	52	PASS
PEACOCK	ST LUCIE	11662	07/2009	37	54	PASS
RAVENSWOOD	BROWARD	3135	11/2008	37	42	PASS

**EXHIBIT B**  
**FLORIDA POWER LIGHT CO.**  
**<80% LOAD SAMPLE**

SUBSTATION	COUNTY	FEEDER	Original Inspection Date	Original GRADE B	Pilot Study GRADE B	Pilot Study <100% = Pass & >100% = Fail
COURTENAY	BREVARD	1935	01/2009	38	47	PASS
ENGLEWOOD	SARASOTA	768	08/2008	38	32	PASS
RIVIERA	PALM BEACH	3134	10/2007	38	61	PASS
COCOPLUM	CHARLOTTE	3263	11/2009	38	44	PASS
QUANTUM	PALM BEACH	7931	07/2012	38	35	PASS
BOCA TEECA	PALM BEACH	4237	04/2007	38	47	PASS
IVES	MIAMI-DADE	6737	11/2012	38	41	PASS
TITUSVILLE	BREVARD	331	06/2008	38	44	PASS
GLENDALE	INDIAN RIVER	7563	06/2012	38	34	PASS
ST AUGUSTINE	ST JOHNS	232	01/2007	39	35	PASS
ST JOE	FLAGLER	2361	07/2010	39	49	PASS
RAINBERRY	PALM BEACH	9634	03/2008	39	56	PASS
PRIMAVISTA	ST LUCIE	5533	10/2009	39	37	PASS
ENGLEWOOD	SARASOTA	768	09/2008	39	50	PASS
ESTERO	LEE	3968	04/2009	40	45	PASS
GERMANTOWN	PALM BEACH	4839	05/2007	40	68	PASS
LABELLE	HENDRY	2464	04/2010	40	39	PASS
EAGLE	FLAGLER	2962	04/2012	40	42	PASS
SAN MATEO	PUTNAM	8431	03/2012	40	52	PASS
VERENA	BROWARD	633	04/2010	42	53	PASS
COCOA	BREVARD	434	10/2008	42	40	PASS
LABELLE	HENDRY	2461	05/2012	42	46	PASS
EDISON	LEE	3631	03/2010	42	37	PASS
CRANE	MARTIN	7162	01/2010	42	31	PASS
COLUMBIA	COLUMBIA	1132	03/2008	42	53	PASS
CASTLE	MANATEE	4661	06/2010	43	48	PASS
ACREAGE	PALM BEACH	6761	12/2007	43	98	PASS
JUPITER	PALM BEACH	1833	06/2009	43	59	PASS
CAPRI	COLLIER	4061	01/2008	43	50	PASS
BIRD	DADE	6931	05/2007	43	27	PASS
CRANE	MARTIN	7162	01/2010	43	40	PASS
DELMAR	PALM BEACH	6935	01/2010	43	47	PASS
FLAGLER BEACH	FLAGLER	1466	10/2008	44	46	PASS
MCCALL	CHARLOTTE	7962	09/2011	44	47	PASS
PAHOKEE	PALM BEACH	834	01/2011	44	75	PASS
SEAGULL	MIAMI-DADE	10163	08/2011	44	33	PASS
ADAMS	ST LUCIE	8462	12/2011	44	58	PASS
KACIE	ST JOHNS	4731	08/2007	45	68	PASS
PACIFIC	ALACHUA	3732	10/2008	45	49	PASS
MCCALL	CHARLOTTE	7961	06/2011	45	80	PASS
DEL TRAIL	PALM BEACH	5867	01/2011	45	52	PASS
SANDALFOOT	PALM BEACH	5039	07/2009	45	53	PASS
CLEVELAND	CHARLOTTE	4431	08/2012	45	36	PASS
MILITARY TRAIL	PALM BEACH	3031	08/2008	46	63	PASS
CLEVELAND	CHARLOTTE	4431	07/2012	46	39	PASS
PRINGLE	FLAGLER	10361	06/2011	47	53	PASS
PAHOKEE	PALM BEACH	834	01/2011	47	68	PASS
OLYMPIA HEIGHT	DADE	8931	08/2007	47	59	PASS
LOXAHATCHEE	PALM BEACH	7663	07/2007	47	46	PASS

**EXHIBIT B**  
**FLORIDA POWER LIGHT CO.**  
**<80% LOAD SAMPLE**

SUBSTATION	COUNTY	FEEDER	Original Inspection Date	Original GRADE B	Pilot Study GRADE B	Pilot Study <100% = Pass & >100% = Fail
CATCHMENT	PALM BEACH	9764	12/2011	47	40	PASS
HIELD	BREVARD	8165	02/2012	48	56	PASS
PALATKA	PUTNAM	432	06/2009	48	53	PASS
METRO	LEE	6165	09/2007	48	39	PASS
OLYMPIA HEIGHT	MIAMI-DADE	8936	04/2012	48	66	PASS
MURDOCK	CHARLOTTE	2065	06/2010	48	63	PASS
WELLBORN	SUWANNEE	9332	06/2012	48	48	PASS
STIRLING	BROWARD	1739	01/2011	48	39	PASS
BABCOCK	BREVARD	4263	07/2010	49	60	PASS
YULEE	NASSAU	1463	06/2011	49	49	PASS
REGIS	FLAGLER	6363	07/2012	49	59	PASS
COVE	MARTIN	8263	11/2011	49	60	PASS
COCOPLUM	SARASOTA	3264	08/2008	49	63	PASS
ELY	BROWARD	2634	09/2011	49	49	PASS
LABELLE	HENDRY	2461	06/2012	49	57	PASS
OSLO	INDIAN RIVER	2937	06/2009	49	53	PASS
ONEIL	NASSAU	7761	01/2012	50	56	PASS
MIAMI SHORES	MIAMI-DADE	3440	10/2010	50	37	PASS
ESTERO	LEE	3961	05/2009	50	42	PASS
REGIS	FLAGLER	6362	09/2012	51	58	PASS
MCCALL	CHARLOTTE	7961	08/2011	51	65	PASS
BOCA TEECA	PALM BEACH	4241	04/2007	51	71	PASS
AVOCADO	MIAMI-DADE	10062	05/2011	51	94	PASS
NOTRE DAME	CHARLOTTE	6862	12/2011	51	73	PASS
CLEVELAND	CHARLOTTE	4433	02/2010	51	57	PASS
ADAMS	ST LUCIE	8461	12/2008	51	44	PASS
DEAUVILLE	MIAMI-DADE	1941	04/2008	52	72	PASS
HARBOR	CHARLOTTE	3766	02/2012	52	65	PASS
NASH	COLUMBIA	6133	11/2008	52	65	PASS
STIRLING	BROWARD	1736	02/2011	52	48	PASS
ST AUGUSTINE	ST JOHNS	233	01/2007	52	48	PASS
INTERSTATE	SARASOTA	8162	09/2011	53	51	PASS
EDGEWATER	VOLUSIA	1936	08/2008	53	76	PASS
PINE RIDGE	COLLIER	4363	06/2010	53	56	PASS
SARASOTA	SARASOTA	164	11/2012	55	88	PASS
IMPERIAL	LEE	7063	04/2011	55	72	PASS
SUNILAND	MIAMI-DADE	6533	12/2009	55	60	PASS
CRESCENT CITY	PUTNAM	631	10/2009	55	74	PASS
ADAMS	ST LUCIE	8462	01/2012	55	71	PASS
INDRIO	ST LUCIE	7464	03/2012	56	53	PASS
SHERIDAN	BROWARD	7033	04/2008	56	64	PASS
ENGLEWOOD	CHARLOTTE	767	11/2008	57	59	PASS
LAKE PARK	PALM BEACH	3931	06/2007	57	75	PASS
DEEPCREEK	CHARLOTTE	6361	04/2008	57	68	PASS
ADAMS	ST LUCIE	8462	12/2011	57	67	PASS
COX	BREVARD	7061	01/2011	58	79	PASS
REGIS	FLAGLER	6362	09/2012	58	61	PASS
FLAGLER BEACH	FLAGLER	1465	12/2009	58	72	PASS
MCCALL	CHARLOTTE	7961	10/2011	58	52	PASS

**EXHIBIT B**  
**FLORIDA POWER LIGHT CO.**  
**<80% LOAD SAMPLE**

SUBSTATION	COUNTY	FEEDER	Original Inspection Date	Original GRADE B	Pilot Study GRADE B	Pilot Study <100% = Pass & >100% = Fail
PERRINE	MIAMI-DADE	4236	07/2008	58	40	PASS
PENNSUCO	MIAMI-DADE	7161	06/2008	58	81	PASS
OLYMPIA HEIGHT	MIAMI-DADE	8936	03/2012	58	62	PASS
DEEPCREEK	CHARLOTTE	6363	04/2008	58	78	PASS
EDISON	LEE	3638	03/2010	58	82	PASS
PLANTATION	BROWARD	1632	11/2007	58	95	PASS
SHERMAN	OKEECHOBEE	6064	07/2011	58	64	PASS
ADAMS	ST LUCIE	8461	12/2008	58	73	PASS
SANFORD	SEMINOLE	133	09/2009	59	59	PASS
SUMMIT	COLLIER	9062	09/2012	59	88	PASS
GARDEN	MIAMI-DADE	4136	07/2009	59	40	PASS
OPA LOCKA	MIAMI-DADE	1233	03/2008	59	89	PASS
WILLOW	VOLUSIA	3834	03/2010	59	56	PASS
IXORA	CHARLOTTE	7862	09/2007	59	58	PASS
SISTRUNK	BROWARD	137	01/2007	60	65	PASS
MCARTHUR	BROWARD	2736	11/2007	60	90	PASS
INTERSTATE	SARASOTA	8162	09/2011	61	52	PASS
CORTEZ	MANATEE	662	06/2008	61	53	PASS
JUPITER	PALM BEACH	1836	11/2007	61	70	PASS
STARKE	BRADFORD	3161	10/2012	61	76	PASS
CORTEZ	MANATEE	635	02/2008	62	63	PASS
COCOPLUM	SARASOTA	3264	08/2008	62	81	PASS
AURORA	BREVARD	2532	01/2011	63	81	PASS
WIREMILL	BAKER	1562	11/2012	63	79	PASS
COCONUT GROVE	DADE	432	08/2007	63	93	PASS
TUTTLE	SARASOTA	4535	03/2009	64	61	PASS
PUNTA GORDA	DE SOTO	1537	09/2010	64	78	PASS
FULFORD	MIAMI-DADE	1433	04/2010	64	74	PASS
MCDONNELL	BREVARD	3934	02/2008	64	30	PASS
OAKES	PALM BEACH	6235	09/2010	65	62	PASS
PALATKA	PUTNAM	433	06/2009	65	73	PASS
BELLE GLADE	PALM BEACH	933	01/2010	65	63	PASS
GERMANTOWN	PALM BEACH	4834	04/2007	65	68	PASS
RIVERTON	ST JOHNS	5761	04/2011	66	83	PASS
NORTON	PALM BEACH	4533	04/2009	66	98	PASS
FLORIDA CITY	DADE	3135	04/2007	66	61	PASS
GREYNOLDS	MIAMI-DADE	2534	05/2010	66	74	PASS
BOULEVARD	MIAMI-DADE	8733	08/2009	66	43	PASS
HIELD	BREVARD	8162	07/2012	67	79	PASS
HASTINGS	ST JOHNS	334	02/2010	67	90	PASS
JOG	PALM BEACH	7236	05/2012	67	94	PASS
ROTONDA	CHARLOTTE	5662	11/2011	67	75	PASS
BONITA SPRINGS	COLLIER	2168	04/2011	68	76	PASS
GLADEVIEW	MIAMI-DADE	2235	01/2010	68	78	PASS
GARDEN	MIAMI-DADE	4141	07/2009	68	93	PASS
RINEHART	SEMINOLE	7933	01/2008	69	73	PASS
LAWRENCE	MIAMI-DADE	5131	03/2011	69	81	PASS
FULFORD	MIAMI-DADE	1435	05/2010	69	97	PASS
ORANGEDALE	SAINT JOHNS	1862	10/2012	69	90	PASS

**EXHIBIT B**  
**FLORIDA POWER LIGHT CO.**  
**<80% LOAD SAMPLE**

SUBSTATION	COUNTY	FEEDER	Original Inspection Date	Original GRADE B	Pilot Study GRADE B	Pilot Study <100% = Pass & >100% = Fail
TURNPIKE	SAINT LUCIE	6161	11/2012	69	89	PASS
PALMA SOLA	MANATEE	2561	01/2007	69	74	PASS
ELY	BROWARD	2632	10/2009	70	97	PASS
LIVE OAK	SUWANNEE	632	04/2010	70	76	PASS
GATLIN	ST LUCIE	10465	08/2011	70	80	PASS
CORTEZ	MANATEE	661	05/2008	71	72	PASS
LEWIS	ST JOHNS	2631	01/2007	71	64	PASS
PALM AIRE	BROWARD	3635	02/2008	71	91	PASS
GLADEVIEW	MIAMI-DADE	2232	11/2010	71	71	PASS
IONA	LEE	1762	01/2008	71	78	PASS
DRIFTWOOD	BROWARD	2037	02/2008	71	76	PASS
ORANGEDALE	SAINT JOHNS	1861	11/2012	72	61	PASS
CASTLE	MANATEE	4661	05/2010	73	35	PASS
GATEWAY	LEE	8462	03/2011	73	94	PASS
GENERAL ELECTRIC	VOLUSIA	1534	01/2008	73	99	PASS
BRADENTON	MANATEE	234	02/2007	74	78	PASS
COCOPUM	SARASOTA	3262	09/2009	74	41	PASS
FLAGLER BEACH	FLAGLER	1464	01/2010	74	84	PASS
SEABOARD	MIAMI-DADE	3638	03/2009	75	79	PASS
DEAUVILLE	DADE	246	09/2007	75	73	PASS
OAKLAND PARK	BROWARD	434	12/2008	75	83	PASS
TURNPIKE	ST LUCIE	6162	08/2009	75	65	PASS
SHERMAN	OKEECHOBEE	6064	06/2011	75	72	PASS
CLEVELAND	CHARLOTTE	4431	08/2012	76	82	PASS
HUNTINGTON	BROWARD	8163	04/2011	76	65	PASS
HIELD	BREVARD	8163	02/2012	78	68	PASS
PALATKA	PUTNAM	433	06/2009	78	71	PASS
LABELLE	HENDRY	2464	04/2010	78	76	PASS
OAKLAND PARK	BROWARD	439	01/2009	78	33	PASS
AUBURN	SARASOTA	5762	01/2012	79	77	PASS
ONECO	MANATEE	2931	07/2010	79	86	PASS
ORTIZ	LEE	3865	02/2009	79	93	PASS
ORTIZ	LEE	3862	04/2009	79	90	PASS
EAGLE	FLAGLER	2962	04/2012	79	97	PASS
ELKTON	ST JOHNS	5832	09/2011	80	81	PASS
NOTRE DAME	CHARLOTTE	6862	12/2011	80	87	PASS
SCOTTSMOOR	BREVARD	5061	06/2011	81	82	PASS
ST AUGUSTINE	ST JOHNS	235	01/2007	81	51	PASS
LIVE OAK	SUWANNEE	632	04/2012	81	91	PASS
SISTRUNK	BROWARD	133	02/2007	82	41	PASS
TERMINAL	PALM BEACH	2134	06/2007	82	91	PASS
HAWKINS	BROWARD	2936	03/2011	82	91	PASS
NASH	COLUMBIA	6133	11/2008	82	97	PASS
MELBOURNE	BREVARD	534	02/2007	83	86	PASS
ST AUGUSTINE	ST JOHNS	234	01/2007	83	141	FAIL
CRYSTAL	BROWARD	3731	06/2008	83	36	PASS
DELTONA	VOLUSIA	4063	12/2012	84	90	PASS
DEAUVILLE	MIAMI-DADE	1940	03/2008	84	31	PASS
VALENCIA	BROWARD	6265	07/2012	84	97	PASS

**EXHIBIT B**  
**FLORIDA POWER LIGHT CO.**  
**<80% LOAD SAMPLE**

SUBSTATION	COUNTY	FEEDER	Original Inspection Date	Original GRADE B	Pilot Study GRADE B	Pilot Study <100% = Pass & >100% = Fail
BABCOCK	BREVARD	4262	09/2008	85	73	PASS
PINE RIDGE	COLLIER	4363	06/2010	86	96	PASS
ABERDEEN	PALM BEACH	8862	09/2008	86	87	PASS
KENDALL	DADE	4331	03/2007	88	181	FAIL
WOODS	MANATEE	6964	06/2011	89	118	FAIL
REGIS	FLAGLER	6365	04/2012	89	52	PASS
LAKE BUTLER	UNION	431	05/2008	89	98	PASS
WESTWARD	PALM BEACH	4033	02/2008	89	97	PASS
FLAGLER BEACH	FLAGLER	1464	01/2010	90	85	PASS
CLINTMOORE	PALM BEACH	5464	08/2008	90	97	PASS
ORANGETREE	COLLIER	7361	06/2012	91	86	PASS
ORANGETREE	COLLIER	7364	09/2012	91	97	PASS
OKEECHOBEE	OKEECHOBEE	1635	05/2008	91	84	PASS
ROSEDALE	INDIAN RIVER	10763	03/2012	92	94	PASS
CRANE	ST LUCIE	7163	09/2009	92	83	PASS
MATANZAS	FLAGLER	2535	08/2012	93	86	PASS
RIVERSIDE	MIAMI-DADE	535	08/2010	93	25	PASS
ALLIGATOR	COLLIER	3562	03/2007	95	75	PASS
COCOPLUM	SARASOTA	3264	07/2008	95	94	PASS
TESORO	SAINT LUCIE	11961	09/2012	95	79	PASS
INDRIO	ST LUCIE	7462	03/2012	95	91	PASS
PROCTOR	SARASOTA	5161	03/2010	96	79	PASS
AURORA	BREVARD	2536	02/2011	96	108	FAIL
GOLDEN GATE	COLLIER	4967	10/2012	96	90	PASS
HUDSON	PUTNAM	1635	03/2009	97	95	PASS
TITUSVILLE	BREVARD	336	06/2008	97	68	PASS
FAIRMONT	BROWARD	734	02/2010	99	118	FAIL
ROSS	PALM BEACH	8166	09/2007	99	53	PASS
SAN MATEO	PUTNAM	8433	08/2009	99	94	PASS
CASTLE	MANATEE	4661	05/2010	103*	72	PASS
COLONIAL	LEE	2636	02/2011	105**	93	PASS
JETPORT	LEE	5063	01/2009	108*	96	PASS
HARBOR	CHARLOTTE	3766	01/2012	110**	91	PASS
MACCLENNY	BAKER	963	05/2010	111*	61	PASS
IXORA	DESOTO	7862	03/2007	111*	78	PASS
INDRIO	ST LUCIE	7462	03/2012	112**	88	PASS
ELKTON	ST JOHNS	5831	09/2011	124**	54	PASS
SOUTH BAY	PALM BEACH	3632	08/2010	132*	95	PASS
METRO	LEE	6166	07/2008	133*	74	PASS
FULFORD	MIAMI-DADE	1435	04/2010	150*	99	PASS
CORKSCREW	LEE	7461	12/2008	160*	69	PASS

\* Pole Replaced  
\*\* Pole Reinforced