Docket 20170215-EU

Review of electric utility hurricane preparedness and restoration actions.

From:
Okefenoke EMC Nahunta GA

Composed by:
Travis Page
Manager of Distribution Services
To:
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Florida Power & Light Company (ken.rubin@fpl.com, kevin.donaldson@fpl.com)
Florida Public Utilities Company (bkeating@gunster.com)
Gulf Power Company (jastone@southernco.com, rab@beggslane.com)
Tampa Electric Company (jbeasley@ausley.com)
Municipal Group (AZubaly@publicpower.com)
Lee County (dennie.hamilton@lcec.net)
Cooperative Group (mhoreshel@feca.com)

Re: Docket No. 20170215-EU - Review of electric utility hurricane preparedness and restoration actions.

To Whom It May Concern:

By this letter, the Commission staff requests that each utility provide responses to the following data requests.

Underground Facilities

1. For each year, please complete the following tables summarizing the number of miles of transmission and distribution underground facilities by county from 2006 through 2017.

<table>
<thead>
<tr>
<th>Year</th>
<th>County</th>
<th>Overhead to Underground</th>
<th>New Construction</th>
<th>Total Miles</th>
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N/A.
Okefenoke REMC is approximately 73% overhead and 27% Underground Distribution.

Forensic Data
2. For Hurricanes Hermine, Matthew, Irma, Maria, and Nate, please provide a complete copy of the utility’s post-storm forensic review of damaged infrastructure. If a forensic review was not performed or not documented, please explain why. N/A

Coordination
3. For Hurricanes Hermine, Matthew, Irma, Maria, and Nate, please provide the name, frequency, and description of non-Emergency Operations Centers related coordination efforts with local governments before, during, and after restoration, including the following.
   a. Storm preparation
   b. Critical infrastructure
   c. Tree trimming, planting or relocation of trees
   d. Hardening and underground projects
   e. Shared facilities
   f. Other

Per Okefenoke REMC Disaster Restoration Plan, We have dedicated no less than 2 employees with multiple private phone lines for communication to EMS, Local and Statewide Law Enforcement as well as EMA offices within all counties we serve in
Georgia and Florida. These communication lines are operational through all stages of Pre-storm, Storm and Post-storm activities.

4. Please complete the following tables on county and state Emergency Operations Centers staffing for Hurricanes Hermine, Matthew, Irma, Maria, and Nate.

### Staffing for County Emergency Operations Centers

<table>
<thead>
<tr>
<th>Number of Utility Personnel</th>
<th>Function</th>
<th>Total Man-Hours</th>
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</table>

N/A

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N/A

### Staffing for State Emergency Operations Center

<table>
<thead>
<tr>
<th>Number of Utility Personnel</th>
<th>Function</th>
<th>Total Man-Hours</th>
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N/A

Solar

5. Please provide the following information for utility interconnections with customer-owned solar generation that did not operate as designed and consistent with the tariff during the extreme weather events that occurred in 2015 through 2017.

**No failure to operate properly conditions were reported**

a. The number of failures. **N/A**

b. A description of the cause or causes of such failures. **N/A**

c. Possible failure remediation and associated cost. **N/A**

d. Discuss whether the failures contributed to an increase or decrease in the utility’s service restoration time and, if possible, provide an estimate of the duration impact. **N/A**
e. Discuss whether the failures contributed to an increase or decrease in the utility’s service restoration costs and, if possible, provide an estimate of the restoration cost impact. N/A

6. Please provide the following information for utility interconnections with customer-owned solar generation that operated as designed and consistent with the tariff during the extreme weather events that occurred in 2015 through 2017.

**All customer owned solar generation operated as designed and tested.**

a. Discuss whether these interconnections contributed to an increase or decrease in the utility’s service restoration time and, if possible, provide an estimate of the duration impact.

No Impact

b. Discuss whether these interconnections increased or decreased the utility’s service restoration costs and, if possible, provide an estimate of the restoration cost impact.

No Impact

7. Without compromising safety, are there changes to the utility’s interconnection with customer-owned solar generation that would enable the customer’s facilities to be energized by its solar generation should the utility be unable to provide electric service due to a future storm damaging utility infrastructure?

**IEEE1547 Address these concerns. No change required**

a. If yes, please provide the following information:
• Please describe the suggested changes to the utility’s interconnection.
• If the utility is not pursuing the interconnection changes please explain why.

N/A

8. Without compromising safety, please describe potential changes to a customer’s facilities that the customer can implement to enable the customer’s facilities to be energized by its solar generation should the utility be unable to provide electric service due to a future storm event that damages utility infrastructure. Include in your response whether the utility makes it a practice to inform the customer of such options.

_per article 690 of NEC, Customers must have a solar interconnection disconnect located near service entrance and accessible to utility and emergency personnel. This disconnect provided an isolation point for the customer solar system._

_Okefenoke REMC incorporates this requirement in the interconnection policy. This isolation point is verified during internal engineering review._

9. Without compromising safety, please describe any potential changes to rules or tariffs pertaining to utility interconnections with customer-owned solar generation that would enable the customer’s facilities to be energized by its solar generation should the utility be unable to provide electric service due to a future storm event that damages utility infrastructure.

_With regard to “Islanding”, Priority should be placed on Safety of Utility Workers and General Public._

10. Please provide the following information for utility interconnections with utility-scale solar generation that did not operate as designed during the extreme weather events that occurred in 2015 through 2017.
a. The number of failures.

b. A description of the cause or causes of such failures.

c. Possible failure remediation and associated cost.

d. Discuss whether the failures contributed to an increase or decrease in the utility's service restoration time and, if possible, provide an estimate of the duration impact.

e. Discuss whether the failures contributed to an increase or decrease in the utility's service restoration costs and, if possible, provide an estimate of the restoration cost impact.

N/A

11. Please provide the following information for utility interconnections with utility-scale solar generation that operated as designed during the extreme weather events that occurred in 2015 through 2017.

a. Discuss whether these interconnections contributed to an increase or decrease in the utility’s service restoration time and, if possible, provide an estimate of the duration impact.

No Impact.

b. Discuss whether these interconnections increased or decreased the utility’s service restoration costs and, if possible, provide an estimate of the restoration cost impact.

No Impact.
Please file all responses electronically no later than January 18, 2018 from the Commission’s website at www.floridapsce.com, by selecting the Clerk’s Office tab and Electronic Filing Web Form. Please contact me at wtaylor@psc.state.fl.us or at 850.413.6175 if you have any legal questions, or contact Emily Knoblauch for technical questions at eknoblau@psc.state.fl.us or at 850.413.6632.

Sincerely,

/s/Wesley Taylor

Wesley Taylor
Attorney

cc: Office of Commission Clerk
Office of Public Counsel (kelly.jr@leg.state.fl.us, sayler.erik@leg.state.fl.us)