



FECA

Florida Electric Cooperatives Association, Inc.

2916 Apalachee Parkway
Tallahassee, Florida 32301
(850) 877-6166
FAX: (850) 656-5485

-VIA ELECTRONIC FILING-

January 17, 2018

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

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

Dear Ms. Stauffer:

Enclosed please find Florida Electric Cooperatives Association's (FECA) supplemental filing in the above-referenced docket. The attached document (FECA's general answers) was inadvertently omitted from the original filing.

If you should have any questions regarding this transmittal, please contact me at (850) 877-6166, ext. 3.

Sincerely,

/s/ Michelle Hershel
Michelle Hershel
Director of Regulatory Affairs
Florida Electric Cooperatives Association
2916 Apalachee Parkway
Tallahassee, FL 32301
(850) 877-6166, ext. 3

Enclosures



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FECA's General Responses

Question 1: Between 2006 and 2017 Florida Electric Cooperatives Association's (FECA) member-cooperatives have consistently hardened facilities and put lines underground after evaluating the costs and benefits of doing so. Each distribution cooperative files a Standards of Construction report to the PSC annually. This report describes the activities pursued by each cooperative in various required areas in order to mitigate damage caused by extreme weather. Stronger and taller poles are being utilized and undergrounding is pursued when viable, especially in new subdivisions. In addition to the PSC reporting requirements, FECA's member-cooperatives who are Rural Utilities Services (RUS) borrowers are required, under the terms of their financial arrangements, to abide by the strict RUS guidelines and standards for construction and maintenance of facilities, including building to extreme loading standards when necessary.

Question 2: After clarifying discussions with PSC staff, we believe the Commission wants information on the root causes of damaged infrastructure. Most of the damage to electric cooperatives' electric facilities during the hurricanes came from trees on the lines and falling on other infrastructure.

Question 3: Electric cooperatives have a strong local connection to their communities and have established relationships with their local governments. Coordination with non-EOC related efforts with local governments is an on-going process and includes discussions on maintenance of rights-of-ways and any other projects involving the cooperative.

Question 4: All of FECA's electric cooperative have established relationships with their local EOCs and are in constant contact with EOC personnel before, during

and after a storm event. Storm preparation and restoration are discussed with local EOCs including identifying critical infrastructures. This contact may be in person or via e-mails, telephones or texts. All contact numbers for key staff at the cooperative are given to local EOCs to ensure communication remains open at all times.

FECA provides the State EOC with contact for information for all of its employees. FECA's storm book includes all EOC staff emails and telephone numbers. If necessary and requested, FECA will have a person on hand at the State EOC during an event but we have not found this particularly more useful or beneficial.

For Questions 5-11:

FECA does not believe its member-cooperatives encountered any interconnection problems with customer-owned solar generation during any of the hurricanes that occurred in 2015-2017. At this time, we do not believe our members are contemplating any major changes to rules or tariffs pertaining to utility interconnections with customer-owned solar generation. In addition, no problems or failures were reported at Seminole's utility-scale solar generator.