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July 15, 2019

Mr. Adam Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

IN RE: *PROPOSED ADOPTION OF RULE 25-6.030, F.A.C., STORM PROTECTION PLAN AND RULE 25-6.031, F.A.C., STORM PROTECTION COST RECOVERY CLAUSE, AND PROPOSED AMENDMENT OR REPEAL OF RULE 25-6.0143, USE OF ACCUMULATED PROVISION ACCOUNTS 228.1, 228.2, AND 228.4, RULE 25-6.034, STANDARD OF CONSTRUCTION, RULE 25-6.0341, LOCATION OF THE UTILITY'S ELECTRIC DISTRIBUTION FACILITIES, RULE 25-6.0342, ELECTRIC INFRASTRUCTURE STORM HARDENING, RULE 25-6.0343, MUNICIPAL ELECTRIC UTILITY AND RURAL ELECTRIC COOPERATIVE REPORTING REQUIREMENTS, RULE 25-6.0345, SAFETY STANDARDS FOR CONSTRUCTION OF NEW TRANSMISSION AND DISTRIBUTION FACILITIES, RULE 25-6.044, CONTINUITY OF SERVICE, RULE 25-6.0455, ANNUAL DISTRIBUTION SERVICE RELIABILITY REPORT, RULE 25-6.061, RELOCATION OF POLES, RULE 25-6.064, CONTRIBUTION-IN-AID-OF-CONSTRUCTION FOR INSTALLATION OF NEW OR UPGRADED FACILITIES, RULE 25-6.077, INSTALLATION OF UNDERGROUND DISTRIBUTION SYSTEMS WITHIN NEW SUBDIVISIONS, RULE 25-6.078, SCHEDULE OF CHARGES, RULE 25-6.081, CONSTRUCTION PRACTICES, RULE 25-6.115, FACILITY CHARGES FOR CONVERSION OF EXISTING OVERHEAD INVESTOR-OWNED DISTRIBUTION FACILITIES; DOCKET NO. 20190131-EU*

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket, are the Florida Municipal Electric Association's, Inc. ("FMEA's") Post-Workshop Comments.

Respectfully submitted,

/s/Dan O'Hagan

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: PROPOSED ADOPTION OF RULE 25-6.030, F.A.C., STORM PROTECTION PLAN AND RULE 25-6.031, F.A.C, STORM PROTECTION COST RECOVERY CLAUSE, AND PROPOSED AMENDMENT OR REPEAL OF Rule 25-6.0143, Use of Accumulated Provision Accounts 228.1, 228.2, and 228.4, Rule 25-6.034, Standard of Construction, Rule 25-6.0341, Location of the Utility’s Electric Distribution Facilities, Rule 25-6.0342, Electric Infrastructure Storm Hardening, Rule 25-6.0343, Municipal Electric Utility and Rural Electric Cooperative Reporting Requirements, Rule 25-6.0345, Safety Standards for Construction of New Transmission and Distribution Facilities, Rule 25-6.044, Continuity of Service, Rule 25-6.0455, Annual Distribution Service Reliability Report, Rule 25-6.061, Relocation of Poles, Rule 25-6.064, Contribution-in-Aid-of-Construction for Installation of New or Upgraded Facilities, Rule 25-6.077, Installation of Underground Distribution Systems within New Subdivisions, Rule 25-6.078, Schedule of Charges, Rule 25-6.081, Construction Practices, Rule 25-6.115, Facility Charges for Conversion of Existing Overhead Investor-owned

Docket No. 20190131-EU

Filed: July 15, 2019

**POST-WORKSHOP COMMENTS OF THE FLORIDA
MUNICIPAL ELECTRIC ASSOCIATION, INC.**

I. INTEREST OF FMEA

Florida Municipal Electric Association, Inc. (“FMEA”) is the statewide trade association for Florida’s 33 public power retail electric utilities.¹

Florida’s 33 communities represented by FMEA traverse the State from the Panhandle to the Southernmost Point. FMEA’s members include: the City of Alachua; the City of Bartow; the City of Blountstown; the City of Bushnell; the City of Chattahoochee; the City of Clewiston; the

¹ General information concerning FMEA as well as specific data about its public power members can be found at its website: www.publicpower.com.

City of Fort Meade; the Fort Pierce Utilities Authority; the City of Gainesville (Gainesville Regional Utilities); the City of Green Cove Springs; the Town of Havana; the City of Homestead; JEA (the City of Jacksonville); the City of Jacksonville Beach (Beaches Energy Services); the Utility Board of the City of Key West, Florida (Keys Energy Services); the Kissimmee Utility Authority; the City of Lake Worth Beach; the City of Lakeland (Lakeland Electric); the City of Leesburg; the City of Moore Haven; the City of Mount Dora; the Utilities Commission, City of New Smyrna Beach; the City of Newberry; the City of Ocala; the Orlando Utilities Commission; the City of Quincy; the City of St. Cloud; the City of Starke; the City of Tallahassee; the City of Wauchula; the City of Williston; the City of Winter Park; and the Reedy Creek Improvement District.

FMEA's municipal electric utility members are required to file annual storm hardening reports pursuant to Rule 25-6.0343 of the Florida Administrative Code, which may be subject to amendment in this docket.

II. COMMENTS IN SUPPORT OF THE FLORIDA ELECTRIC COOPERATIVES ASSOCIATION, INC.

For the reasons set forth therein, FMEA supports the Florida Electric Cooperatives Association, Inc.'s ("FECA's") post-workshop comments filed in this docket. Like FECA, FMEA believes that Rule 25-6.0343, F.A.C., should be amended to provide for a three-year storm hardening reporting requirement for municipal electric utilities and rural electric cooperatives. As explained in FECA's comments, this brings the municipal and cooperative utilities' reporting requirements more in line with those of the Investor Owned Utilities ("IOUs") and reduces administrative burden on both PSC and municipal/cooperative utility staffs, without reducing the quality or effectiveness of the reports.

III. CONCLUSION

For the foregoing reasons, including those set forth in FECA's post workshop comments, FMEA respectfully requests the Commission amend Rule 25-6.0343, F.A.C., to provide for a three-year storm hardening reporting requirement for municipal electric utilities and rural electric cooperatives, utilizing the amended rule language provided in Attachment A of the FECA post workshop comments.

Respectfully submitted,

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General Counsel & Chief Legal Officer

/s/ Dan O'Hagan

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