

Susan D. Ritenour
Secretary and Treasurer
and Regulatory Manager

One Energy Place
Pensacola, Florida 32520-0781

Tel 850.444.6231
Fax 850.444.6026
SDRITENO@southernco.com



January 30, 2006

Ms. Mary Anne Helton
Staff Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850

Dear Ms. Helton:

RE: FPSC Infrastructure Workshop held on January 23, 2006

In response to your request at the January 23, 2006 Staff Workshop, attached are Gulf Power Company's post-workshop comments addressing possible short-term and long-term initiatives that Gulf is evaluating to help minimize damage to our transmission and distribution facilities against future storms.

As discussed at the Workshop, Gulf Power Company continually strives to provide the very best customer service in every aspect of our business. Gulf looks forward to working with you on these complex and critical issues for our industry in Florida.

Please give me a call at 850-444-6231 if you have any questions.

Sincerely,

Susan D. Ritenour (lew)

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Attachment

cc: Beggs and Lane
Jeffrey A. Stone, Esquire

**Gulf Power Company's Comments
Requested From**

**FPSC Infrastructure Workshop
January 23, 2006**

In addition to the short and long term items itemized below, Gulf Power has many initiatives already in place which address the FPSC's current concerns with the ability of transmission and distribution systems to withstand new storms. These existing initiatives include:

- Gulf continues to facilitate overhead to underground conversion requests through a department dedicated to such requests.
- Gulf continues a front line construction philosophy. This promotes the construction of facilities on road right-of-ways which permits easy access to maintain and repair.
- Gulf installs main line underground feeders in concrete duct banks.
- Gulf continues its efforts with local municipalities to develop tree ordinances that facilitate Gulf's vegetation management activities.
- Gulf continues its commitment to a 10 year pole inspection cycle. The inspection process will be enhanced as described below.

Items which Gulf views as possible short term solutions (to be completed by June 1, 2006):

- Gulf Power is constructing an interim EOC to be used during the 2006 storm season. This interim EOC will be used in the event of a hurricane producing a storm surge the height of that seen during Katrina. Also, Gulf is planning to permanently relocate its EOC further inland as described below in the long term solutions.
- Gulf Power's Transmission System restoration plan will be supported by Southern Company's *Transmission Emergency Response Plan* (TERP). The TERP will be developed and maintained to serve as restoration guidelines to consistently provide a quick response and proper coordination of emergency restoration efforts.
- Prior to each storm season Gulf will patrol and correct problems on main circuits serving essential facilities.
- Gulf will install storm guying for new installations of regulator stations and transformer bank poles where practical.
- Gulf will begin collaborating with independent weather services and universities to determine areas most vulnerable to storm surges. This effort will address the need for updated and more accurate "slosh" (Sea, Lake and Overland Surges from Hurricanes) models to show possible storm surge scenarios and the impacted transmission and distribution facilities.

- In areas not prone to storm surge, the number one contributor to storm outages are trees. In order to enhance Gulf's existing vegetation management process, Gulf requests governmental assistance with the following:
 - Increasing the ability of utilities to conduct vegetation management activities outside the road right-of-way or easement when necessary to eliminate vegetative conditions that pose a hazard to power lines.
 - Discouraging the planting of trees outside of the right-of-way or easement that, when mature, could grow into or fall into a power line.
- As stated above, Gulf will continue its 10 year cycle on distribution pole inspection. In addition, through the Pole Manager software implemented in 2005, Gulf will improve pole data collection and from such data begin development of accurate pole maps.
- As a part of Gulf's plans to develop options for making underground distribution equipment more resistant to storm surges, Gulf will conduct a pilot program for stainless steel flush mounted switch gear; utilize existing land topography and buildings to help shield pad mounted equipment from storm surges; and modify pad designs to incorporate anchoring.
- Gulf will implement a pilot program incorporating the use of secondary spool racks. This pilot will evaluate how damage could be mitigated to overhead transformer stations when trees or other debris impact overhead service drops.
- Gulf will initiate a detailed post storm data collection process to provide improved storm damage analysis and data collection. This process would be in addition to Gulf's current restoration process, which it finds to be very effective. It is essential that the new data collection process be conducted as a parallel process that would not hamper the existing restoration process.

Items which Gulf views as possible long term solutions (to be initiated after current storm season):

- Gulf plans on constructing a new permanent Emergency Operating Center incorporating the best design features seen in other EOCs along with the latest technology. This facility will be located further inland than the current EOC. This relocation is based on the evaluation of current facility locations against storm surges similar to those seen in the impact zone of Hurricane Katrina. Although storm surges of that magnitude are unprecedented in our service area, a storm surge similar to that produced by Hurricane Katrina could cause unprecedented damage.
- Gulf will use the "slosh" (Sea, Lake and Overland Surges from Hurricanes) maps developed under the short term solutions to evaluate hardening options for facilities located in the identified most vulnerable areas.
- In an effort to capitalize on opportunities to apply solutions to "hardening" distribution facilities from storms, Gulf will expand its current planning processes to facilitate cooperative efforts with local governments.
- Where practical, Gulf will install storm guying for regulator stations and transformer bank poles on existing installations.
- Gulf will endeavor to develop infrastructure maps showing all utilities (OH & UG) to facilitate joint "hardening" options where needed. This will have to be a collaborative effort among all utility companies in Gulf Power's service area.

- Gulf will collaborate with fellow IOU's to develop and evaluate a "hardening road map" for transmission and distribution facilities.
- Gulf is continuing the development of a Distribution Geographic Information System (DistGIS) which will replace its existing mapping system. The new application has the ability to hold and query more detailed data (i.e. pole and structure GIS locations) on the transmission and distribution system.
- Gulf will seek the collaboration of universities on our research. Gulf will establish a single point of contact to lead this effort with universities, with Georgia Tech's National Electric Energy Testing Research and Applications Center (NEETRAC) and with the Southern Company Distribution Research Advisory Team (DRAT).