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October 17, 2006

Ms. Blanca S. Bayo, Director  
Division of the Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee FL 32399-0870

Dear Ms. Bayo:

Re: Docket No. 060198-EI

Enclosed are Gulf Power Company's comments to Staff's proposed annual performance metric requirements related to the Storm Preparedness Plans to be filed in the above referenced docket.

Sincerely,

*Susan D. Ritenour (lw)*

lw

cc: Beggs and Lane  
Russell A. Badders, Esquire

## **GULF POWER COMPANY'S**

### **COMMENTS ON STAFF'S PROPOSED STORM INITIATIVE METRICS**

**Docket No. 060198-EI**

**October 17, 2006**

Thank you for the opportunity to provide comments to Staff's proposed annual performance metric requirements related to the Storm Preparedness Plans. Gulf Power Company has included specific comments to the proposed performance metrics in this filing where possible and is requesting clarification on other proposed items in order to fully develop comments that could help facilitate discussions at the October 30 Workshop. Gulf is also working with the other electric IOUs which may result in additional joint comments for the workshop. We look forward to working with Staff to provide the most meaningful comments on these very important issues.

#### **Initiative 1 – Three-Year Vegetation Cycle**

##### Gulf's Comments:

- Request clarification on Item (J) of the Table. What is Staff's intent regarding Outage Restoration Costs?
- The metrics call for the reporting of the number of hotspot trims in Item (G). This metric will be cumbersome and time consuming to track and report. Gulf would recommend collecting miles of line cleared by trim type (hotspot vs. maintenance) instead.

#### **Initiative 2 – Joint-Use Pole Attachment Audits for the Year**

##### Gulf's Comments:

- Gulf should be able to answer part a) with a percent, although determining the percent by feeder or lateral is not an item Gulf currently performs.
- Part d) is the only one that can reasonably be answered each year without a long response under this heading. Gulf performs a five year pole attachment audit contractually with other joint use attachers and pole owners. Therefore, Gulf's annual response will not be a percentage of our system completed, as the larger IOU's may be doing. Every five years, Gulf will perform the joint use pole count audit to collect data on this and other requested data.
- Gulf performs a complete and comprehensive field survey of all joint-use poles once every 5 years (all of our contracts state that they may not be performed at intervals more often than this). This survey identifies by company, how many actual attachments they have made on Gulf's poles. This information is then used to compare actuals to the reported number of attachments each company has submitted with Gulf, and if they are in the correct geographic areas per each companies' contract. Next, Gulf checks the number of permitted attachments we have on record and if they are not the same as what

the survey has shown, then an invoice is generated based on the difference to reflect the new and correct billing levels with appropriate back billing charges.

- Regarding the Joint-Use Attachment Audits Table, Gulf's offers the following comments:
  1. Request definition of leased distribution pole attachments.
  2. Does this data request refer to poles Gulf is attached to and owned by others, or poles Gulf owns with others and attached to them?
- Request clarification on what is meant by pole rents and jurisdictional in paragraph following the table.

### **Initiative 3 – Six-Year Inspection Cycle for Transmission Structures**

#### Gulf's Comments:

- Request clarification on Staff's definitions for "circuits" and "towers" as used in this initiative.
- As part of its groundline inspection program, Gulf currently checks to ensure the pole strength is sufficient for the pole loading at that location which consequently ensures compliance with the NESC at the time the pole was installed. If the pole does not meet the requirements, it is then replaced and Gulf will report this data.

### **Initiative 4 – Storm Hardening Activities for Transmission Structures**

#### Gulf's Comments:

- Staff's request to describe how the specific activities were selected and why they are better than some unnamed alternative will be difficult. Request clarification on this data request.
- Request clarification on the level and nature of input by local communities and governments regarding transmission structures. There could be many such entities which could result in conflicting requests.

### **Initiative 5 – Geographic Information System (GIS)**

#### Gulf's Comments:

- For distribution overhead input, Gulf assumes the definition of "asset" equates to poles and for distribution underground input, Gulf assumes the definition of asset equates to transformers and switchgears. Request clarification from Staff on this point.
- Using poles as a metric would show what is currently in GIS and what remains to be added and progress in capturing poles without equipment on them and clearance poles through our pole inspection process.

## **Initiative 6 – Post-Storm Data Collection and Forensic Analysis**

### Gulf's Comments:

- Gulf has finalized data collection needs and data collection forms and is in the process of developing the software layout for computerized collection of field data on hand held computers.
- There are still issues that need to be resolved concerning GIS integration and final report formats, but Staff's proposed data request appears to be consistent with Gulf's expectations related to forensic data collection and reporting.

## **Initiative 7 – Outage Data Differentiating Between Overhead and Underground Systems**

### Gulf's Comment:

- Staff's proposed underground and overhead data request appears to be consistent with Gulf's expectations of compiling data from available TCMS data that is requested for any storm.

## **Initiative 8 – Increase Coordination with Local Governments**

### Gulf's Comments:

- Staff's proposed local government coordination data request contains valuable suggestions, but could be difficult to administer. Because Gulf has multiple contacts and activities on almost a daily basis with local governments, quantifying and measuring all the efforts could become cumbersome, costly and counterproductive.
- Measuring and counting activities is rarely as accurate as measuring results. We believe that is the case here and suggest that rather than measuring activities – which will vary depending on storm opportunities, company programs, etc... – that we measure the results achieved by letting the counties and cities grade our interactions, programs, events and ongoing coordination efforts. For instance – some counties have hurricane drills twice a year, some have none. Some counties have active emergency operation centers, some have very small scale operations. This makes it difficult to judge, compare and measure overall what the utility's effectiveness is if you just count contacts.
- Gulf's suggested plan for implementation of local government coordination metrics includes the following:

During the last quarter of each year an evaluation sheet be prepared by the Emergency Operation Director of each county the utility serves that details the company's interactions with emergency operations and the confidence the local government has in the utility's coordination and cooperation.

Suggested questions for the annual evaluation sheet would include:

1. Did the utility participate in all emergency drills during the year?  
How many were held?
2. Is the utility responsive to emergency operation requests for critical facility restorations?
3. Did the utility have an ongoing presence in the Emergency Operation Center before, during and after the hurricane.
4. Has the utility identified specific personnel as contacts for local governments? Are you confident that you can find a receptive utility representative at any time of the day or night?
5. Does the utility participate in public information releases and press briefings with the county?
6. Does the utility provide the public with hurricane information as matter of business during the course of the year?
7. Does the utility work well with the other utilities and agencies to put the public first before, during and after a hurricane?
8. Were there any operational or electrical system maintenance issues identified for improvement by emergency operation personnel?
9. In what areas do you think the utility can improve it's coordination with local government?
10. How do you think the general public would rate the utility's storm preparations and restoration efforts -- Poor, adequate or outstanding?

It would be the responsibility of the utility to ensure each county completes an evaluation and submits them to the FPSC. This process would let local leaders know that the utility is accountable to them and to the state for effective, ongoing coordination.

This approach also allows flexibility within each local government area for the utility to work within the patchwork of local programs, organizations, different facilities and different restoration plans to do what is most effective in each location.

But at the same time this suggested plan gives the utility and the commission a clear picture of the effectiveness of the utility's overall efforts without creating an accounting system that only measures activities and not true results.

### **Initiative 9 – Collaborative Research**

#### Gulf's Comments:

- Project Planning Report
  1. It appears this proposed report is intended to require the IOUs to submit a report for each project being researched pursuant to the MOU and that this report would be required periodically as projects are added to Appendix A of the MOU. Request clarification from Staff.

2. It is appropriate for a project planning report to be submitted for each project approved by the steering committee, but not for each project identified. The Steering Committee will be continuously identifying and evaluating potential projects for research coordination, but, for a variety of reasons, may decide not to pursue certain projects. Research projects are considered approved when the project sponsors and PURC agree to amend Appendix A to the MOU. Appendix A includes a detailed description of the research to be facilitated by PURC. Inclusion of a research project in Appendix A indicates that all project sponsors are committed financially to moving forward with a project.
  3. Information requested in the report is reasonable.
  4. Suggest that report be submitted within a certain number of days, perhaps 21 days, after the steering committee vote to amend Appendix A to include new research projects.
- Annual Progress Report
    1. This report appears to be an annual status report of all projects approved by the Steering Committee. Confirm with Staff.
    2. Information requested in the report is reasonable.
  - Project Completion Summary Report
    1. It is reasonable for the Commission to receive an update on the concluded research projects; however, the information requested in this report would be more appropriately included in the annual report.
    2. The report should include an assessment of the “findings or outcome,” rather than the “success.”
  - Annual Report of the Collaborative Research Effort
    1. Same response as Project Completion Summary Report (see previous report response).

### **Initiative 10 – Disaster Preparedness and Recovery Plan**

#### Gulf’s Comments:

- Gulf will submit by March 1<sup>st</sup> of each year the disaster preparedness plan and other requested data described above.
- Staff’s proposed data request appears to be in agreement with Gulf’s expectations related to the disaster preparedness plan.