

Matilda Sanders

From: Nanci_Nesmith@fpl.com
Sent: Monday, November 13, 2006 3:22 PM
To: Filings@psc.state.fl.us
Subject: Electronic Filing for Docket No. 060531-EU - Florida Inspection Program Deviations.

ORIGINAL
Power & Light Company's Response: Pole

Attachments: FPL Pole Inspection Deviations 11-13-06.doc



FPL Pole
action Deviatic

Electronic Filing

a. Person responsible for this electronic filing:

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b. Docket No. 060531-EU - Review of All Electric Utility Wooden Pole Inspection Programs.

c. Document is being filed on behalf of Florida Power & Light Company.

d. There are a total of 3 pages.

e. The document attached for electronic filing is Florida Power & Light Company's Response: Pole Inspection Program Deviations.

(See attached file: FPL Pole Inspection Deviations 11-13-06.doc)

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- ECR _____
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- OPC _____
- RCA _____
- SCR _____
- SGA _____
- SEC 1 _____
- OTH _____

DOCUMENT NUMBER-DATE

10421 NOV 13 06

FPSC-COMMISSION CLFRK

ORIGINAL

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November 13, 2006

- VIA ELECTRONIC DELIVERY -

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk and
Administrative Services
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Boulevard, Room 110
Tallahassee, FL 32399-0850

Re: Docket No. 060531-EU

Dear Ms. Bayó:

In Order No. PSC-06-0778-PAA-EU, entered in this docket on September 18, 2006, the Commission ordered each electric IOU to file in this docket additional data that supports its deviation from any of the pole-inspection requirements set forth in Order No. PSC-06-0144-PAA-EI within 30 days after the consummating order is issued in this docket. Consummating Order No. PSC-06-0855-CO-EU was issued on October 13, 2006. Order No. PSC-06-0778-PAA-EU identified two instances in which FPL deviated from the aforementioned pole-inspection requirements. Accordingly, I am enclosing for filing in the above docket a document entitled "FPL Response: Pole Inspection Program Deviations," which explains and justifies FPL's practices of (i) not excavating around poles that are surrounded by concrete or pavement, and (ii) not excavating transmission poles except when warranted by sounding.

If there are any questions regarding this transmittal, please contact me at 561-304-5639.

Sincerely,

/s/ John T. Butler

John T. Butler

Enclosure

Cc: Counsel for parties of record (w/encl.)

DOCUMENT NUMBER-DATE

10421 NOV 13 06

FPSC-COMMISSION CLERK

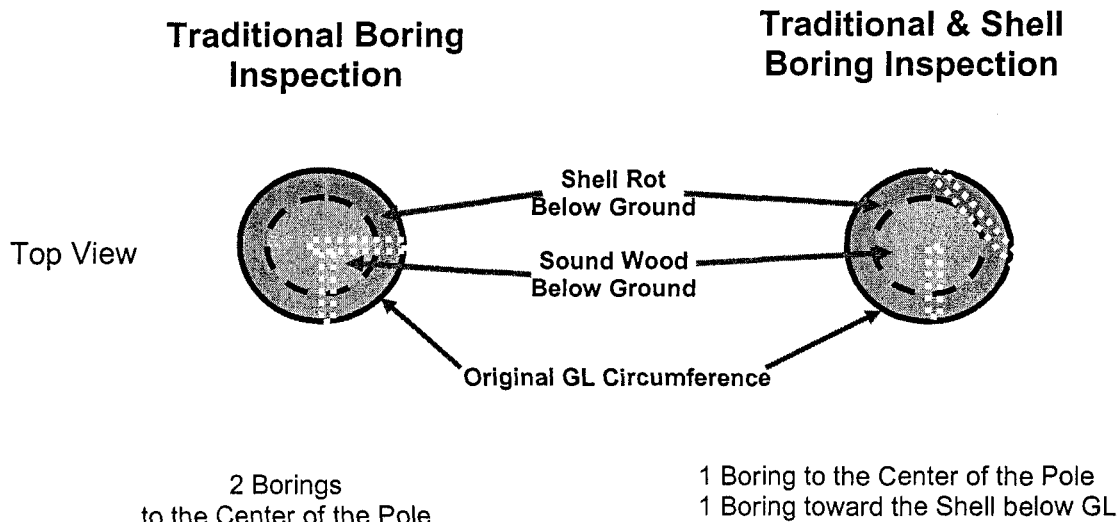
FPL Response: Pole Inspection Program Deviations

(1) No excavation of poles surrounded by concrete or pavement

All Southern pine poles that can not be excavated for such reasons as set in pavement or presence of electric risers, are to be inspected using the following process:

- 1) Poles are visually inspected above ground level to check for woodpecker holes, cracks, etc. Poles that do not pass visual inspection are scheduled for replacement; if poles pass this inspection, they are sounded & bored.
- 2) Poles are sounded from ground level to as high as the inspector can reach in order to locate interior pockets of decay. For boring, Osmose has developed a variation on the traditional boring procedure that better addresses the decay conditions specific to Florida. This ground level inspection method is referred to as "Shell Boring". The drill bit is placed and aimed so it will inspect the outer shell of the pole below ground. Southern yellow pine poles are bored both into the heart of the pole and into the outer shell below ground. The shell boring procedure used by Osmose increases the accuracy of inspection, since shell rot is the predominant decay pattern. This method complies with FPL's pole inspection specification Section 4.4.4 - "Poles set in concrete or pavement shall be bored at least twice with the bored holes at 90 degrees from each other at the groundline down at a 45 degree angle into the pole and the boring sample checked for decay or voids.
- 3) Once step 2 is completed, poles are internally treated with woodfume.

The above-described was developed by Osmose and is the standard inspection method utilized in Florida for poles that can not be excavated. This field condition is also encountered by Osmose in other states of the country. The standard method utilized requires drilling both borings at ground line at a 45 degree angle to a depth of the center line of the poles.



Osmose, the industry leader in wood pole inspections, considers this inspection procedure to be the best method available for poles that can not be excavated. Based on their experience, Osmose believes that this inspection method identifies priority poles with extensive below-grade decay.

Additional inspection devices and technology are currently under evaluation by Osmose. If any changes in inspection technology occur that it is proven to be more accurate and effective than current methods, it will be added to FPL inspection specifications and implemented by Osmose to increase inspection efficiency.

(2) No excavation of transmission poles except when warranted by sounding

FPL has established an intensive transmission wood pole inspection program. In 1998, FPL increased the frequency of its climbing inspections on 100% of its wood transmission poles to 3, 4, or 8 year cycles, exceeding the guidelines in the RUS bulletin. FPL increased the frequency because of inspection results and historical performance of components, such as insulators & cross-arms, located above ground-line. In June 2006, FPL again increased the frequency of its inspection on 100% of its transmission poles, regardless of material, to 3, 4, or 6 year cycles. The majority (70-75%) of the maintenance work identified from these climbing inspections are located above ground-line.

As part of this inspection program, FPL uses a conservative approach for ground-line assessments of wood transmission poles. Ground line inspections consist of sounding the pole around its circumference and scraping the wood for identifying decay or voids. Inspectors occasionally will excavate around ground line to help the evaluation if sounding warrants further investigation. If decay or voids are present, inspectors reject wood transmission poles for ground-line deterioration regardless if the remaining cross-sectional area still meets or exceeds the National Electrical Safety Code (NESC) requirements. All rejections result in pole replacements.

The above inspection approach has resulted in zero (0) wood transmission structure failures because of ground-line or subsurface deterioration over the past seven years. In addition to being effective, FPL uses this conservative inspection program in facilitating the phase out of wood transmission structures. Over time, these wood poles are replaced with FPL's current design standard of concrete.

FPL also believes back-fill material and compaction are key components for transmission structural performance. The structure capacity is reduced when back-fill material and compaction are reduced. FPL limits the amount of locations where disturbance of existing soil compaction occurs by only requiring excavation if warranted by sounding.

However, to further evaluate its current inspection process, FPL will conduct subsurface inspections (via excavation) on a statistical sample population of wood transmission poles previously inspected with current methods between January-August 2006. This population will consist of wood transmission poles identified both with and without decay/voids. FPL will use a different inspection contractor from the one who performed the original inspection.

FPL will analyze this data to determine the value of the excavation requirement. In its March 2007 pole inspection filing, FPL will provide an update of this analysis and any recommendations for conducting future inspections.