

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: October 8, 2018
TO: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk
FROM: Samantha Cibula , Office of the General Counsel *S.M.C.*
RE: Docket No. 20011351-EI

Please file the attached materials in the docket file listed above.

Thank you.

Attachment

JOHN M. McKAY
President



THOMAS FEENEY
Speaker




THE FLORIDA LEGISLATURE
**JOINT ADMINISTRATIVE
PROCEDURES COMMITTEE**

Representative Donna Clarke, Chair
Senator Betty S. Holzendorf, Alternating Chair
Senator Bill Posey
Senator Ken Pruitt
Representative Nancy Argenziano
Representative Wilbert "Tee" Holloway

CARROLL WEBB, EXECUTIVE DIRECTOR
AND GENERAL COUNSEL
Room 120, Holland Building
Tallahassee, Florida 32399-1300
Telephone (850) 488-9110

MEMORANDUM

TO: Christiana T. Moore
FROM: John Rosner 
DATE: September 12, 2002
SUBJECT: Public Service Commission Rule 25-6.0455

RECEIVED
02 SEP 13 PM 1:49
FLA PUBLIC SERVICE COMM.
OFFICE OF THE
GENERAL COUNSEL

The rule incorporates three forms in subsections (1)(a) –(c). Please send me a copy of these forms. In addition, the rule should state the respective effective dates of the forms as well as the fact that the documents are incorporated by reference. See, section 120.55(1)(a)4., F.S.

cc: Mr. Harold McLean, General Counsel

128532
JR: CB C:\DATA\WORD\JR\25-6.DOC

STATE OF FLORIDA

COMMISSIONERS:
LILA A. JABER, CHAIRMAN
J. TERRY DEASON
BRAULIO L. BAEZ
MICHAEL A. PALECKI
RUDOLPH "RUDY" BRADLEY



OFFICE OF THE GENERAL COUNSEL
HAROLD A. MCLEAN
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

September 16, 2002

Mr. John Rosner
Joint Administrative Procedures Committee
Room 120, Holland Building
Tallahassee, Florida 32399-1300

Re: Rule 25-6.0455

Dear Mr. Rosner:

This letter is in response to your memorandum dated September 12, 2002, regarding the forms identified in the above rule. Copies of the three forms are enclosed.

I apologize for inadvertently failing to send you copies of the forms along with the rule proposal package. As you can see, the forms do not impose any requirement or solicit any information not specifically required by Rule 25-6.0455. Thus, because the forms do not meet the definition of "rule" in section 120.52(15), Florida Statutes, the requirements of section 120.55(1)(a)4. to state in the rule the respective effective dates of the forms and that they are incorporated by reference do not apply.

I hope this response satisfactorily addresses your concerns. Please do not hesitate to call me if you have questions.

Sincerely,

A handwritten signature in cursive script that reads "Christiana T. Moore".

Christiana T. Moore
Associate General Counsel

Enclosures

Primary Causes of Outage Events

Utility Name _____

Year _____

Cause (a)	Number of Outage Events(N) (b)	Average Duration (L-Bar) (c)	Average Restoration Time (CAIDI) (d)
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
All Other Causes			
System Totals			

Service Reliability Indices

Utility Name _____

Year _____

District or Service Area (a)	SAIDI (b)	CAIDI (c)	SAIFI (d)	MAIFle (e)	CEMI5 (f)
System Averages					

JOHN M. McKAY
President



THOMAS FEENEY
Speaker



THE FLORIDA LEGISLATURE
**JOINT ADMINISTRATIVE
PROCEDURES COMMITTEE**

Representative Donna Clarke, Chair
Senator Betty S. Holzendorf, Alternating Chair
Senator Bill Posey
Senator Ken Pruitt
Representative Nancy Argenziano
Representative Wilbert "Tee" Holloway

CARROLL WEBB, EXECUTIVE DIRECTOR
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Room 120, Holland Building
Tallahassee, Florida 32399-1300
Telephone (850) 488-9110

October 10, 2002

Mr. Christiana T. Moore
Associate General Counsel
Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

RECEIVED
02 OCT 15 PM 2:09
FLA PUBLIC SERVICE COM. H.
OFFICE OF THE
GENERAL COUNSEL

**Re: Public Service Commission
Proposed Rules 25-6.044 and 25-6.0455, F.A.C.**

Dear Ms. Moore:

Your request for certification of the amendments to rules 25-6.044 and 25-6.0455, F.A.C., dated October 9, 2002, have been received by our office. Mr. Rosner is out on annual leave until October 21, 2002. In his absence, your request for certification was brought to my attention. In reviewing the file I note Mr. Rosner's memo to you of September 12, 2002. Based upon your response dated September 16, 2002, we will file the requested certification with the Department of State, Bureau of Administration Code for October 18, 2002, which enables you to file the rules between October 18 and October 25, 2002. This action is taken based upon your request for certification. Upon his return, Mr. Rosner will complete his review of this file.

Sincerely,

Carroll Webb
Executive Director and
General Counsel

cc: Mr. Harold McLean, General Counsel

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

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GARY R. RUTLEDGE
GOVERNMENTAL CONSULTANTS
MARGARET A. MENDUNI
M. LANE STEPHENS

May 9, 2002

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

HAND DELIVERY

RECEIVED
02 MAY 10 AM 10:44
FLA PUBLIC SERVICE COMM.
OFFICE OF THE
GENERAL COUNSEL

Re: Docket No. 011351-EI

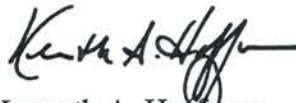
Dear Ms. Bayo:

Enclosed herewith for filing on behalf of Florida Power & Light Company, Florida Power Corporation, Tampa Electric Company and Gulf Power Company are an original and fifteen copies of Responses to the Staff Data Requests served by Staff Memorandum dated April 9, 2002 and related to the Statement of Estimated Regulatory Costs to be prepared by Staff in connection with proposed amendments to Rules 25-6.044 and 25-6.0455, Florida Administrative Code.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,


Kenneth A. Hoffman

KAH/rl

Enclosures

cc: Christiana Moore, Esq., with enclosure
Robert Vandiver, Esq., with enclosure

FPL\Bayo.506

Docket No. 011351-EI
Responses of Florida Power & Light Company,
Florida Power Corporation, Tampa Electric Company
and Gulf Power Company to Staff Data Requests served April 9, 2002

1. All can comply with the proposed rule requirements with minimal incremental costs. While all utilities are able to provide and comply with the proposed requirements, it is important to note that the level of accuracy for each utility could differ as a result of the various systems and processes utilized by each utility to capture and report outage information. These differences could result from things such as each utility's system capabilities, the utilization of those capabilities, estimating methods and techniques used by each utility, etc. While acknowledging that these differences exist, the utilities believe that the reported results would not be materially affected. However, if additional levels of detail or more accurate levels of information are determined necessary, significant modifications to existing systems and processes could be required that would result in incremental costs (one-time as well as recurring) for all utilities. The extent of the incremental costs would depend on the required level of accuracy.

2. There are no identified additional benefits from the proposed rule.

3. The "strawman" proposal submitted by the IOU's in November 2000 continues to represent a lower cost alternative method of accomplishing the requirements of the proposed rule.

4. No additional comments or cost estimates.

One Energy Place
Pensacola, Florida 32520

850.444.6111



November 29, 2000

Mr. William B. McNulty
Public Utilities Supervisor
Bureau of Electric Reliability
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

RECEIVED
00 DEC - 1 AM 10:57
FLORIDA PUBLIC SERVICE COMMISSION
DIVISION OF APPEALS

Dear Mr. McNulty,

As requested in your letter dated June 8, 2000, enclosed is the Florida IOU Reliability Committee's ("Committee") response regarding a "strawman" proposal for definitions and methodologies for measuring adequate electric service. As you are aware, one of this Committee's main objectives during the last three years was to assist the Staff in educating and enhancing the Commission's reliability reporting mechanisms. We believe this proposal achieves that by providing consistent and, more importantly, meaningful reliability data that should provide the necessary information for the Commission to monitor overall reliability. In some instances, we have omitted information that is currently being provided, e.g., N, L-Bar, and causes of outage information, because we believe it provides little or no benefit and, actions to improve these indices may actually incent behaviors that are not in our customers' best interests. We also have suggested providing more information in some cases, e.g., 5 year historical averages and planned corrective actions in areas within each utility's service territory that need improvement, because we feel it does provide the Commission with useful information.

The Committee believes that Staff and the Commission need to recognize that reliability is a function of many changing variables which fall under various degrees of being within the utility's control (e.g., system design, maintenance, restoration efforts, tree trimming, geographic location, weather, dig-ins, vehicle accidents, animal activity). All of which can change at the same time. Monitoring and managing reliability is complicated. Too much data can be confusing and can generate many questions, that, while they can be answered, may not provide any contributing improvement to reliability. It is for this reason that the Committee believes that a simple, bottom-line monitoring approach of overall reliability is appropriate for the Commission to adopt. The Florida IOU 1999 reliability indicator results demonstrate that the overall reliability in Florida is significantly better than the national average. With the proposed monitoring and reporting tools, we believe that the utilities and the Commission will have what is necessary to identify early warning signals, prevent a significant deterioration of reliability and maintain Florida's current favorable reliability ranking.

As part of our effort, the Committee reviewed FAC 25-6.044, 25-6.0455, 25-6.046, and 25-6.047. While we believe 25-6.046 and 25-6.047 require no changes, we do recommend changes to 25-6.044 and 25-6.0455. Attached, in legislative format, are the proposed revisions. In summary, the changes recommended are to: (1) Adopt the Institute of Electrical and Electronics Engineers, Inc. ("IEEE") definitions and standards for measuring reliability performance, i.e., SAIDI, CAIDI, and SAIFI (Maintain the more stringent >1 minute interruption standard in place of the IEEE's >5 minute interruption standard); (2) Report these indicator results annually along with a previous 5 year average; and (3) Provide areas that are targeted for improved performance. In adopting the SAIDI, CAIDI, and SAIFI indicators, the Commission would be utilizing the same reliability measurement standards adopted by the IEEE. This will provide the Staff and the Commission with consistently prepared, as well as, comparative data. The "Areas Targeted for Improved Performance Report" would list areas that experienced 5 or more breaker lockouts in a year, indicate repeat feeders from the previous year's list, identify the number of customers affected, show the CAIDI based on the number of breaker lockouts and identify planned corrective actions along with their completion dates. Even though most of the IOU's begin to analyze feeders prior to 5 interruptions, we believe the 5 or more outages cut-off is appropriate because our own experience shows that it is at this point that enough data has usually been collected to analyze and determine the appropriate corrective action. The addition of the plan and schedule for the corrective actions provides more meaningful information than the simple listing of the feeders, which has been previously provided.

Also, in your November 3 letter, other information was requested regarding customer surveys and procedures used to verify compliance with voltage standards. While this Committee is aware that customer surveys are performed by each utility, we are unaware of any survey questions and responses that are available that would be used to establish, quantitatively, an acceptable level of service for all of our customers. Regarding voltage standards compliance, each utility has specific practices/processes for verifying voltage compliance. Generally, however, voltage compliance is verified during several common stages for each utility. Initially, voltage requirements are considered and built into the original design criteria and then tested and verified prior to connecting a meter. Then, during the periodic planning review process, each feeder is reviewed and analyzed for various current, as well as future, considerations, e.g., load, power factor, and voltage. Finally, as a result of specific customer problems or inquiries, voltage measurements are taken and appropriate actions are implemented, if determined necessary.

Finally, we also understand that the Staff is interested in establishing some sort of quality and/or reliability standards. We caution the Staff that this is something that, if done, should be done very carefully and cautiously and with much dialogue between all parties.

Florida's utilities operate in a very harsh environment with varying weather patterns. As was discussed in several of our meetings this year, over the last 10 years, Florida shows the highest lightning flash density in the United States. In independent studies completed by both FP&L and FPC, lightning was the predominant weather factor showing a significant correlation to outages. Yet, even with the extreme lightning experienced in Florida, all Florida utilities compare quite favorably to the 1999 SAIDI national average of 118. Additionally, this comparison improves even more when Florida's IOU's are compared to the Southeast region.

In conclusion, monitoring and managing reliability is a very complicated and complex responsibility. Too much information can be confusing and may not provide answers to improving reliability. The Committee's proposal for new indicators and reports to monitor overall reliability are based on national and international standards and also provides the Commission with specific areas within each of the utilities service territories that are experiencing a higher level of interruptions. These indicators and reports will provide the Commission with the necessary information to appropriately monitor overall reliability.

We appreciate the opportunity to work with and provide our input to Staff on this matter.

Sincerely,



Edward J. Battaglia, P.E., Chairman
IOU Reliability Group

cc: Luis Delforn, Florida Power and Light
J. E. Horne, Florida Power Corp.
Dave Maxon, Florida Power Corp.
Jim Howard, Tampa Electric Co.
Don Myers, Florida Public Utilities

PART IV – GENERAL SERVICE PROVISIONS

25-6.044	Continuity of Service
25-6.045	Frequency Standards (Repealed)
25-6.0455	Annual Distribution Service Reliability Report
25-6.046	Voltage Standards
25-6.047	Constant Current Standards
25-6.048	Limiting Connected Load
25-6.049	Measuring Customer Service
25-6.050	Location of Meters
25-6.051	Rental Charge for Meters (Repealed)
25-6.052	Test Procedures and Accuracy Accuracy of Meters
25-6.053	Requirements as to Use of Instrument Transformers (Repealed)
25-6.054	Laboratory Testing Equipment
25-6.055	Portable Standards
25-6.056	Periodic Meter Tests
25-6.057	Methods of Meter Test (Repealed)
25-6.058	Determination of Average Meter Error
25-6.059	Meter Test by Request
25-6.060	Meter Test – Referee
25-6.061	Relocation of Poles
25-6.062	Inspection of Wires and Equipment
25-6.063	Temporary Service (Repealed)
25-6.064	Extension of Facilities

25-6.044 Continuity Reliability of Service.

(1) Definitions:

- (a) “Service Customer Interruption” (CI). An unplanned interruption of electric service greater than or equal to one minute due to a malfunction on the distribution system or a distribution-related outage caused by events on the utility’s side of customer meters, ~~which is triggered by load management restoration.~~ The term does not include interruptions due to momentary circuit breaker operations, ~~hurricanes,~~ named storms by the National Hurricane Center, tornadoes ~~verified by the National Weather Service,~~ ice on lines, planned load management, or electrical disturbances on the generation or transmission system, or any event that required activation of an EOC. Any other excludable interruption must be submitted to and approved by the Director of Safety and Electric Reliability.
- (b) “Customer Minutes of Interruption” “Customer Interruption Duration” (CMI \pm). The time interval, in minutes, between the time when a utility first becomes aware of a service interruption and the time of restoration of service to a customer affected by that service interruption.
- (c) “System Interruption Time” The total customer minutes of service interruption experienced on a utility’s system during a given time period, determined by summing the total minutes of Customer Interruption Duration for all interruptions during that time period. The total minutes of Customer Interruption Duration for an individual interruption is calculated by summing the Customer Interruption Duration for each customer affected by that individual interruption (estimated if actual data is not available). “Total number of customers served” (C). The total number of customers served on the last day of the reporting period.
- (d) “Number of Service Interruptions (N). The sum of service interruptions for the entire distribution system, or whichever portion of the distribution system which is being reviewed. “System Average Interruption Duration Index” (SAIDI). The average time the customers are interrupted. In equation form:

$$\text{SAIDI} = \frac{\text{Sum of all Customer Minutes Interrupted (CMI)}}{\text{Total number of Customers served (C)}}$$

- (e) ~~“Average length of a Service Interruption (L-Bar)”~~ The time interval, in minutes, between the time when the utility first becomes aware of a service interruption and restoration of service to the last customer affected by that service interruption, summed for all service interruptions occurring during a given time period, and divided by the Number of Service Interruptions in the same time period. “Customer Average Interruption Duration Index” (CAIDI). The average time required to restore service to the average customer per customer interruption. In equation form:

$$\text{CAIDI} = \frac{\text{Sum of Customer Minutes Interrupted (CMI)}}{\text{Total number of Customer Interruptions (CI)}}$$

- (f) ~~“System Average Interruption Frequency Index” (SAIFI). The average frequency of customer interruptions per customer. In equation form:~~

$$\text{SAIFI} = \frac{\text{Total number of Customer Interruptions (CI)}}{\text{Total number of Customers served (C)}}$$

- (2) Each utility shall keep a record of the cause of each sustained customer interruption, ~~and shall categorize the cause as one or more of the following: lightning, tree or limb contacting line, animal, line downed by vehicle, dig in, substation outage, line transformer failure, salt spray on insulator, corrosion, other, or unknown, and shall further identify whether the initiating event occurred on overhead or underground distribution lines.~~
- (3) Each utility shall make all reasonable efforts to prevent interruptions of service and when such interruptions occur shall attempt to restore service within the shortest time practicable consistent with safety.
- (4) When the service is necessarily interrupted or curtailed for prolonged periods and for the purpose of working on the system, it shall be done at a time which, when at all practicable, will cause the least inconvenience to customers and all such scheduled interruptions shall be preceded by adequate notice whenever practicable to affected customers.
- (5) The provisions of this rule shall not apply to customers receiving service under interruptible rate classifications.

Specific Authority: 366.05(1), F.S.

Law Implemented: 366.03, 366.04(2)(c), 366.04(5), 366.05, F.S.

History: New 7/29/69, formerly 25-6.44 amended 2/25/93.

25-6.045 Frequency Standards.

Specific Authority: 366.05(1), F.S.

Law Implemented: 366.05(1), F.S.

History: Amended 7/29/69, formerly 25-6.45. Repealed 2/25/93.

25-6.0455 Annual Distribution Service Reliability Report.

(1) Each utility shall file a written Distribution Service Reliability Report with the ~~Director of the Commission's Division of Electric and Gas~~ Director of Safety and Electric Reliability on or before March 1st of each year, covering the preceding calendar year. The report shall contain the following information:

- (a) the utility's total number of service interruptions (N), categorized by cause as specified in Rule 25-6.044, and the average length of service interruptions experienced (L-Bar). The utility's SAIDI, CAIDI, SAIFI for year end.
- (b) Other approved exclusions with a description of the exclusion and its SAIDI impact calculated based on the total number of customers served on the last day of the reporting period.
- (c) identification of the three percent of the utility's feeders with the highest number of feeder breaker interruptions. Each feeder shall be identified by its number, substation.

and general location as well as the estimated number of customers in each service class served by the feeder circuit, as well as the number of service interruptions (N) and average length of service interruption (L-Bar) for the feeder. The utility's previous five (5) year average for SAIDI, CAIDI, SAIFI.

- (d) The utility's **Areas Targeted for Improved Performance** based on circuits with breaker lockouts greater than or equal to five (> 5). Each circuit shall have the following information provided: circuit number; substation name and address, whether it was on the previous year's report; number of breaker lockouts; number of customers affected; CAIDI (based on the number of breaker lockouts); corrective action planned; and date of corrective action. The total number of company circuits will also be provided.

Specific Authority: 366.05(1), F.S.

Law Implemented: 366.03, 366.04(2) (c) & (f), 366.04(5), 366.05, 366.05(7), F.S.

History: New 2/25/93.

ANNUAL DISTRIBUTION RELIABILITY REPORT

(year)

(Utility)

RELIABILITY INDICES FOR YEAR END

System Average Interruption Duration Index = SAIDI

SAIDI = (Sum of All Customer Minutes Interrupted (CMI) / Total number of Customers Served (C)) = _____ = _____

Customer Average Interruption Duration Index = CAIDI

CAIDI = (Sum of Customer Minutes Interrupted (CMI) / Total number of Customer Interruptions (CI)) = _____ = _____

System Average Interruption Frequency Index = SAIFI

SAIFI = (Total Number of Customer Interruptions (CI) / Total Number of Customers Served (C)) = _____ = _____

OTHER EXCLUSIONS

Description: _____

SAIDI Impact : _____

PREVIOUS 5 YEAR AVERAGE RELIABILITY INDICES

System Average Interruption Duration Index = SAIDI

SAIDI = _____

Customer Average Interruption Duration Index = CAIDI

CAIDI = _____

System Average Interruption Frequency Index = SAIFI

SAIFI = _____

**CITY OF WINTER PARK**401 PARK AVENUE SOUTH
WINTER PARK, FLORIDA 32789-4386(407) 599-3234
FAX (407) 599-3436OFFICE OF THE
CITY COMMISSION

BARBARA DORITY DE VANE

September 21, 2001

James E. Breman
Public Service Commission
Division of Safety & Electric Reliability
2540 Shumard Oaks Blvd.
Tallahassee, FL 32399-0862

ORIGINAL

Re: Reliability Workshop set for 10:00 a.m. on September 26, 2001

Dear Mr. Breman:

I have reviewed the proposed rule changes regarding electric service distribution reliability measurement and reporting and I offer the following comments.

I fully support any effort to improve reliability in electric service and increased accountability of the providers. I support the credit to each customer that experiences more than five outages during a calendar year. Without this type of penalty, there is no real incentive for the utility to improve reliability.

We suggest the following modifications:

1. 25-6.0455(1)(b) This information should be provided for all primary circuits (feeders) instead of only those with more than two outages. This will make service reliability of all feeders a matter of public record. These reports should be available on the PSC web site for review. The City of Winter Park has experienced great difficulty getting reliability information on the feeders in Winter Park from Florida Power Corporation. Upon our request, the Public Service Commission provided us information on those feeders appearing on the worst 3% list, but did not have the information on the rest of the feeders in Winter Park.
2. The information provided by the utilities including SAIDI, CAIDI, SAIFI, MAIFI and CEM2 should be subject to audit inspection by

Public Service Commission
September 19, 2001
Page 2

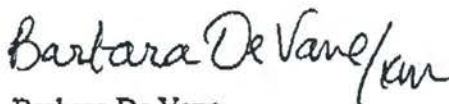
ORIGINAL

the Public Service Commission or its designee or consultant. Without audit authority, the data is much more subject to improper manipulation.

3. Undergrounding of utilities would go a long way to improve reliability in many situations and should reduce maintenance cost to the provider. The Investor-Owned Utilities use the PSC as their excuse for not placing lines underground. They say that the PSC won't allow them to recover the cost of undergrounding in rate base. If this is true, there should be criteria established to begin to require a certain percentage of the lines to be placed underground each year. While this would not be a quick process, each little bit would improve the state-wide system.

I am encouraged to see the PSC proposing changes to improve reliability and accountability. If there is anything I can do to help, please let me know.

Sincerely,



Barbara De Vane
Vice Mayor

cc: Public Service Commissioners
Mayor & City Commissioners
City Manager

STATE OF FLORIDA

COMMISSIONERS:
E. LEON JACOBS, JR., CHAIRMAN
J. TERRY DEASON
LILA A. JABER
BRAULIO L. BAEZ
MICHAEL A. PALECKI



DIVISION OF SAFETY & ELECTRIC RELIABILITY
JOSEPH D. JENKINS
DIRECTOR
(850) 413-6700

Public Service Commission

November 19, 2001

Mr. Gary Livingston
c/o Gulf Power Company
101 North Monroe Street
Tallahassee, Florida

Dear Mr. Livingston:

Enclosed are photographs taken of Gulf Power's distribution lines in contact with vegetation. These lines should be cleared as soon as possible.

Sincerely,

Joseph D. Jenkins
Director

JDJ:w
Enclosure

✓ cc: Chris Moore

RECEIVED
01 NOV 19 PM 12:00
FLORIDA PUBLIC SERVICE COM.
DIVISION OF APPEALS



Tree trimming problem
in Panama City, 10/1/01



RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
KENNETH A. HOFFMAN
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MARTIN P. McDONNELL
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R. DAVID PRESCOTT
HAROLD F. X. PURNELL
MARSHA E. RULE
GARY R. RUTLEDGE
GOVERNMENTAL CONSULTANTS
MARGARET A. MENDUNI
M. LANE STEPHENS

March 4, 2002

Christiana Moore, Esq.
Florida Public Service Commission
Division of Appeals
Room 301G
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

HAND DELIVERY

RE: Docket Number 011351-EI

Dear Chris:

On behalf of Florida Power and Light Company, Florida Power Corporation, Gulf Power Company, Tampa Electric Company and Florida Public Utilities Company (the "IOUS"), I would again like to thank Staff for its consideration of our suggested revisions to the revised drafts of the proposed amendments to rules 25-6.044 and 25-6.0455 discussed at the February 21, 2002 Staff Workshop. As we suggested at the workshop, we believe it would be appropriate to defer consideration of the CEMI5 definition and reporting requirement and to reschedule consideration of those provisions upon the conclusion of the rate cases in which CEMI5 reporting and refund/penalty provisions have been placed at issue in adversarial proceedings before the Commission. Indeed, the most efficient course of action may be to defer action on the entire set of proposed rule amendments pending the conclusion of these rate cases.

As part of the IOUS' suggested comments at the February 21 workshop, we offered the following language changes and additions for Staff's consideration, which I am confirming in writing per your request:

RECEIVED
02 MAR -4 PM 4: 38
FLORIDA PUBLIC SERVICE COM.
DIVISION OF APPEALS

Rule 25-6.044

1. Paragraph (1) - - Add the following definition of "Emergency Service Interruption":

An unplanned, however, necessary interruption that is initiated by the utility or at the request of a governmental agency for customer restoration efforts, utility personnel or public safety concerns. Customers are not typically notified in advance of these outages.

but

2. Paragraph (1) - - Add the following definition of "Momentary Interruption Event":

An interruption of duration limited to the period required to restore service by an interrupting device. This would include all reclosing operations which result in zero voltage and which occur before a five minute window of no interruption occurrences.

3. Paragraph (1)(b) - - Remove the definition of "Average Duration of Outage Events (L-Bar)".

4. Paragraph (1)(f) - - insert the word "events" after the word "interruption."

5. Paragraph (2)-- amend second sentence to read as follows:

The utility shall record each Outage Event as planned, unplanned or emergency and shall identify the point of origination such as generation facility, transmission line, transmission substation equipment, or other distribution equipment.

Rule 25-6.0455

1. Replace L-Bar with CAIDI in the reporting requirements language of paragraph (1)(a) and the Draft Form PSC/ERC 102-1 attached to the proposed amended rules.

2. Paragraph (1)(b) - - amend second sentence to state as follows:

For each primary circuit so identified the utility shall report the primary circuit identification number or name, substation origin, general location, number of affected customers by service class served, Number of Outage Events (N), Average Duration of Outage Events (L-Bar), Average Service Restoration Time (CAIDI), whether

Page 3
March 4, 2002

the same circuit is being reported for the second consecutive year, the number of years the primary circuit was reported on the 3% Feeder List in the past five years, and the corrective action date of completion.

Thank you for your consideration of these comments. Please call if you have any questions.

Sincerely,



Kenneth A. Hoffman

KAH/knb

cc: Mr. Joe Jenkins
Mr. Jim Breman
Mr. Bill McNulty
Mr. Roland Floyd
IOU Reliability Committee
Interested Parties of Record

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500 South Orange Avenue
Orlando, FL 32802

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FLORIDA PUBLIC SERVICE COMM.
DIVISION OF APPEALS

March 14, 2002

Christiana Moore, ESQ
Florida Public Service Commission
Division of Appeals Room 301 G
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket # 011351-EI

Dear Christiana:

On behalf of Orlando Utilities Commission, I enclose my comments regarding the February 21st workshop. The following issues are related to Continuity of Service and Reliability Reporting:

Issue #1 CEMi5

The CEMi5 index as a measure of poor electric reliability is not totally accurate. To assume that the utility has mismanaged the electric distribution system any time a customer experiences more than five outages can be incorrect. The utility has little to no control over certain outage events such as car hit poles, cable dig-ins, and falling trees.

There are many outage events that the utility can influence, at least to some extent. These include failed equipment, vegetation, animals and lightning. I would suggest the outages that the utility has control over be the ones included in the CEMi5 index.

I understand and support your desire to make utilities accountable for durations and frequency of outages but disagree with the CEMi5 as it is now calculated.

Issue #2 Replacing L-Bar with CAIDI

The L-Bar statistic is the best measure of a utility's response time. It measures the time between when the utility first becomes aware of the outage until the outage is restored. It treats each customer equally regardless of how big or how small the outage is.

Orlando Utilities uses the L-Bar statistic as its main performance measurement. Not only do we keep the statistic on a service area level but we also track the top 50 customers using the L-Bar statistic. We believe so strongly in the relevance of the L-Bar statistic that our annual reliability goals are based on achieving an L-Bar of 60 minutes.

The CAIDI index is directly affected by the number of customers associated with the outage and therefore not a true measure of customer outage time. While OUC tracks this indicator, we believe that L-Bar along with SAIDI offers a better measurement of service reliability. They also provide the necessary internal and external trending that we require.

Part of the argument against the L-Bar statistic centered on the issue of partial restoration and how L-Bar accounts for multiple restoration steps. The L-Bar statistic should be modified to allow for tracking partial restoration of outage events. While I agree that the number of outages (N) will be increased its effect should be minimal.

To support this argument, I have attached a chart showing the total number of feeder lockouts for the past five years. The lockouts have been separated by service area and fiscal year. Furthermore, they are grouped by one-step restoration vs. multiple restoration steps. In summary, 77% of the lockouts required only one step in order to restore service to the entire feeder.

In addition, we randomly selected one month to determine what percent of the service interruptions required multiple restoration steps. For this sampling (December 2001), it was determined that of the 199 outages, only 4% required multiple restoration steps.

Issue #3 Emergency Service Interruption

Another item discussed was the addition of an outage category for "Emergency Service Interruptions". This type of interruption would be excluded from the L-Bar and SAIDI calculations much like scheduled outages already are.

There are many situations such as burnt jumpers and broken insulators, where a feeder breaker has to be opened in order to safely resolve the problem. Using this definition to deal with these situations seems only logical.

However, the abuse of this definition could open up many possibilities to exclude outage events under the "emergency" header. A utility could essentially postpone maintenance activities and address broken/failed equipment under the "Emergency Service Interruption" category without having to be accountable for the outage.

I would suggest that some accountability as to the usage of this category be implemented. This could be accomplished by requiring a breakdown of outages that fall into this category.

Secrets to Success

In order to provide a higher level of service to our customers, OUC has radically changed the way it responds to outages in recent years. We now deploy multiple layers of response staff to expedite power restoration. Single-man electric trouble trucks work around the clock providing 24 hour coverage eliminating delays associated with calling in personnel after an outage occurs. The construction group schedules a contingent of personnel whose shifts extend into evening hours and who can be immediately redirected from performing routine work to resolve trouble calls. Furthermore, if a backlog of trouble calls should occur during workday hours, OUC construction crews provide assistance.

This past year OUC continued to sharpen its focus on providing the most reliable electric service possible. We kept service interruptions to a minimum and, most importantly, kept our customers happy. We concentrate on working hard for our customers and maintaining "Main Street" vs. "Wall Street" relationships with the communities we serve.

Sincerely,



Bradley D. Chase

Director – Operations

Attachments

Feeder Lockout Data
Single vs. Multiple Steps in Restoration

		Orlando		St Cloud	
		Single Step	>1 Step	Single Step	>1 Step
FY 98	10/97	4	1	4	1
	11	3	1	0	0
	12	8	2	3	1
	1/98	10	0	1	1
	2	18	5	2	1
	3	4	2	0	0
	4	5	0	1	0
	5	7	2	0	0
	6	10	2	7	1
	7	9	1	1	0
8	44	1	1	0	
9	32	0	1	1	
		154	17	21	6
Percentage		90%	10%	78%	22%
FY 99	10/98	7	2	0	0
	11	9	2	3	2
	12	4	2	1	0
	1/99	4	3	3	2
	2	5	4	2	0
	3	6	1	1	1
	4	5	1	1	1
	5	5	1	2	2
	6	22	4	1	0
	7	11	3	3	3
8	11	1	10	3	
9	6	4	1	0	
		95	28	28	14
Percentage		77%	23%	67%	33%
FY 00	10/99	7	4	1	1
	11	5	3	0	0
	12	7	2	0	0
	1/00	31	3	2	1
	2	3	0	0	0
	3	4	2	0	0
	4	6	3	0	0
	5	4	2	0	0
	6	16	7	4	1
	7	15	6	4	2
8	6	2	3	2	
9	8	3	2	1	
		112	37	16	8
Percentage		75%	25%	67%	33%

Feeder Lockout Data
Single vs. Multiple Steps in Restoration

		Single Step	>1 Step	Single Step	>1 Step
FY01	10/00	4	2	0	0
	11	3	1	2	2
	12	15	4	0	0
	1/01	2	1	0	0
	2	6	2	1	0
	3	12	4	2	2
	4	3	2	2	0
	5	7	6	14	4
	6	16	9	8	2
	7	11	5	6	1
	8	8	2	2	1
	9	17	4	3	1
		104	42	40	13
Percentage		71%	29%	75%	25%
FY 02	10/01	15	7	1	0
	11	4	3	1	0
	12	3	0	0	0
	1/02	4	1	0	0
	2				
	3				
	4				
	5				
	6				
	7				
8					
	9				
		26	11	2	0
Percentage		70%	30%	100%	0%
Subtotals		491	135	107	41
Percent		78%	22%	72%	28%
% of lockouts requiring only one step to restore =					77%
% of lockouts requiring more than one step to restore =					23%