

Gregory C. Brubaker
Associate General Counsel



Florida Public Service Commission
Tallahassee, Florida 32399-0850
Frontier.com

November 1, 2022

Via UPS

Florida Public Service Commission
Office of Commission Clerk
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

REDACTED

RECEIVED-FPSC
2022 NOV -2 AM 10:30
COMMISSION
CLERK

Re: **Request for Confidential Treatment**
Docket 2022000-OT; Frontier Florida LLC Emergency Response and Storm
Restoration Procedures and Protocols

To Whom It May Concern:

In accordance with Rule 25-18.020, Florida Administrative Code, Frontier Florida LLC hereby files its Emergency Management Plan. For the reasons set forth below, Frontier requests confidential treatment of the Plan under Rule 25-22.006(4)(a) and is, therefore, filing an original and two redacted copies of it.

The information set forth in the body of the Plan on pages 3 – 8 and 12 – 18 is confidential under Fla. Stat. §§ 366.093(3)(c), as it contains information relating to Frontier’s security measures, systems, and procedures, and Fla. Stat. § 119.0725(2)(b), as it contains information relating to critical infrastructure. The information set forth in the body of the Plan on pages 19 – 38 is confidential under Fla. Stat. § 366.093(3)(f) because it contains certain employee personnel information.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG 1 redacted
- GCL _____
- IDM _____
- CLK _____

Florida Public Service Commission
Office of Commission Clerk
November 1, 2022
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If you have any questions regarding this matter, please do not hesitate to contact me at 260.241.3606 or via email.

Best regards,



Gregory C. Brubaker
gregory.c.brubaker@ftr.com

Enclosures

cc: Penelope Buys (cover letter via electronic mail; redacted Plan via UPS)

FL State EMP - East Region

Last Updated 09/22/2022 6:11 PM UTC by GOELLNER,
LEONARD F (SPCLST, QUALITY ASSURANCE SR)

Published 10/26/2022 3:51 PM UTC



FRONTIER CONFIDENTIAL

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1. Purpose

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

2. Scope

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. Assumptions

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. Strategy

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. Activation Triggers

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5.1. Natural Disasters

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5.2. Damage to Premise

[REDACTED]

[REDACTED]

| [REDACTED]

5.3. Loss of Utility Supply

| [REDACTED]
| [REDACTED]
| [REDACTED]

5.4. Disclosure of Sensitive Information

| [REDACTED]

5.5. Labor Strike

| [REDACTED]
| [REDACTED]

5.6. Act of War / Terrorism / Sabotage

| [REDACTED]
| [REDACTED]
| [REDACTED]

5.7. Pandemic

| [REDACTED]
| [REDACTED]

6. State Requirements

6.1. State Statutes and Rules

Memorandum dated September 12, 2007 and 25-18.020 Pole Safety, Inspection, Maintenance, and Vegetation Management effective May 1, 2022

6.2. Plan Content Requirements

At a minimum, staff believes that a hurricane preparedness plan should include the following items:

- Storm Monitoring
- Emergency Governance
- Standard Operating Procedures for emergencies
- Business Unit preparedness plans
- Asset Preparation
- Asset Inventory
- Contractor and Vendor List
- Recovery / Restoration efforts
- Plan testing

25-18.020 Emergency response and storm restoration procedures and protocols.

(a) The procedures and protocols must include the following:

1. A description of the communications services provider's procedures and protocols for communicating with federal, state, and local emergency operations officials;

2. A description of how the public can contact the communication services provider to report issues with its poles, such as broken poles, downed overhead facilities, or obstructive vegetation

- **The public can contact Frontier toll free 1.800.921.8101 to report issues with poles. Additional consumer information can be found on Frontier's emergency resources page <https://frontier.com/resources/emergency-preparation#> . .**

3. A description of the communication services provider's procedures to repair and replace damaged poles and overhead facilities, including protocols for coordinating with public utilities, through emergency response and storm restoration efforts.

- Following a storm event, Frontier will conduct a facilities damage assessment and will work in conjunction with other pole owners, electric utilities, and/or third party attachers to determine the appropriate entity to lead the repair or replacement of infrastructure and the order of preference for repairing aerial facilities. If Frontier owns a damaged pole with no electric utility facilities on it, Frontier will replace the pole and reattach its aerial facilities. Once completed, Frontier will notify other attachers that they are permitted to move their cables to the new pole. If Frontier owns a damaged pole that also has electric utility facilities attached, or if Frontier has aerial facilities on a damaged pole that it does not own, Frontier will wait for notification from the electric utility that the pole has been replaced and Frontier is permitted to reattach its aerial facilities. In a major storm event impacting electric utility-owned poles, the electric utility will coordinate replacement and broadly notify impacted attachers once rebuilding is completed in a designated area. Upon notification, Frontier will proceed with reattaching to the electric utility poles throughout the area.

6.3. Commission Filing Requirements

Per Memorandum dated September 12, 2007, ILECs were to file their plan with the PSC on recovery measures taken in the event of a hurricane and include storm preparedness measures

25-18.020 (b) If the communication services provider makes changes to its emergency response and storm restoration procedures and protocols, the communication services provider must file the updated emergency response and storm restoration procedures and protocols with the Division of Engineering within 30 days of the change.

6.4. Commission Notification Rules

25-18.020(c) Every 3 years (effective Nov. 1 2025) notify the Division of Engineering in writing that Frontier has reviewed its emergency response and storm restoration procedures and protocols.

6.5. Commission Contacts

n/a

6.6. 911 Disruption Notification

n/a

6.7. Commission Specified Outage Level Response, Recovery or Restoration Strategies

n/a

6.8. Emergency Drill Requirements

n/a

7. ERC Activation

7.1. ERC National Contacts - INFORMATIONAL MEMBERS

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7.3. FL ERC Core Team

[Redacted text block containing approximately 13 lines of obscured content]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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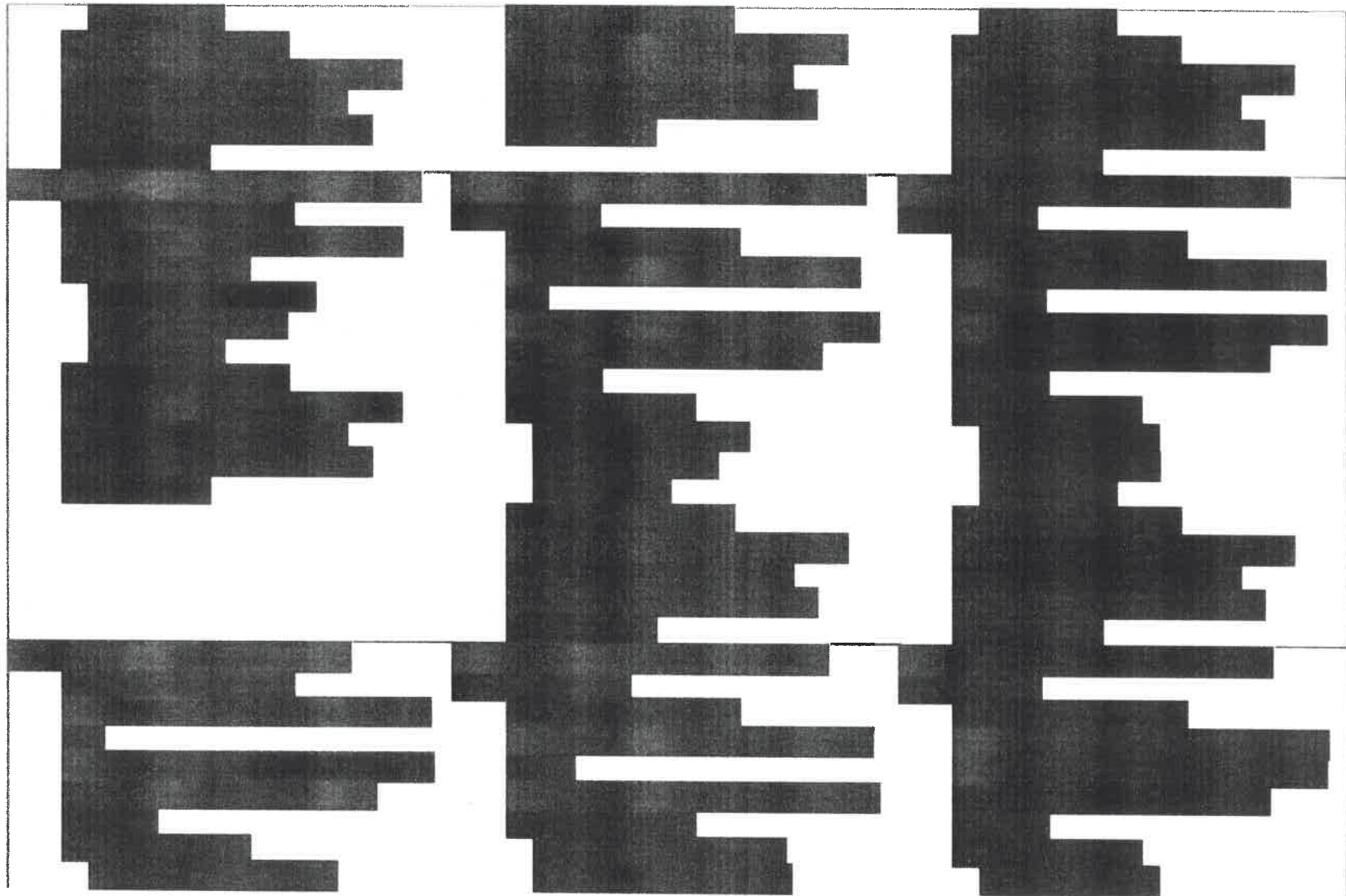
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A. Appendix Associated Personnel Contact Info

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[REDACTED]	[REDACTED]	[REDACTED]

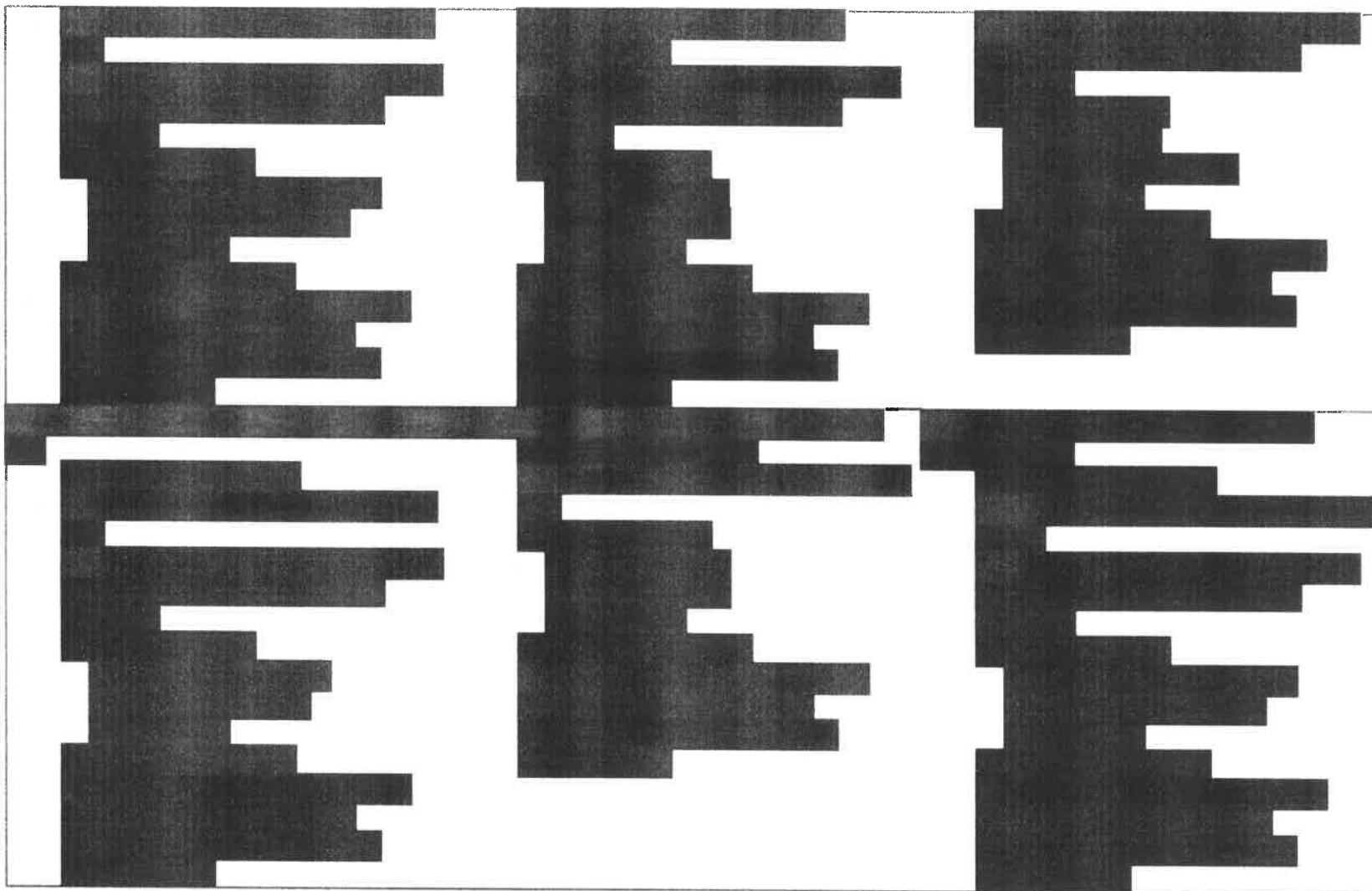
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[REDACTED]	[REDACTED]	[REDACTED]

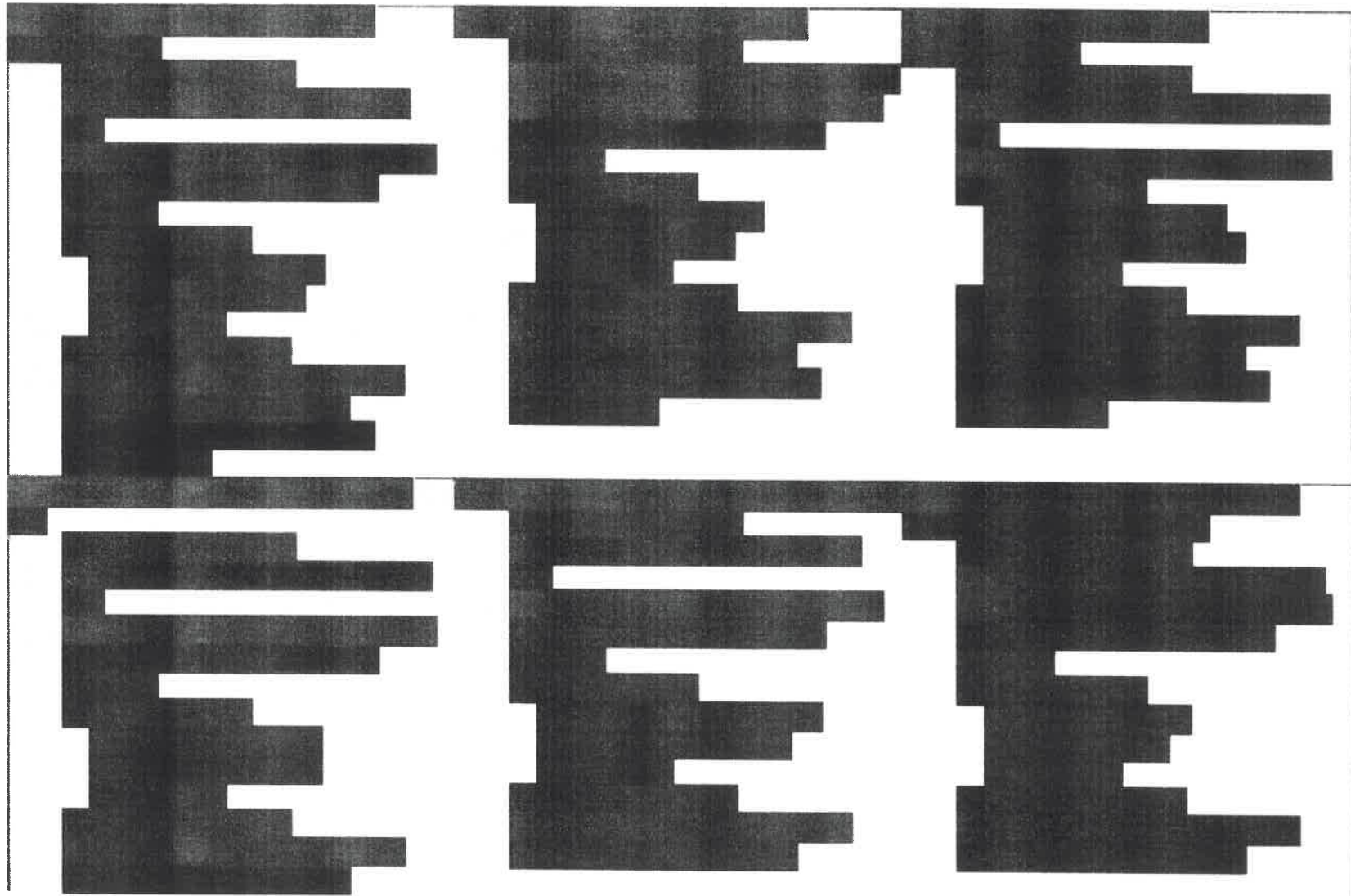


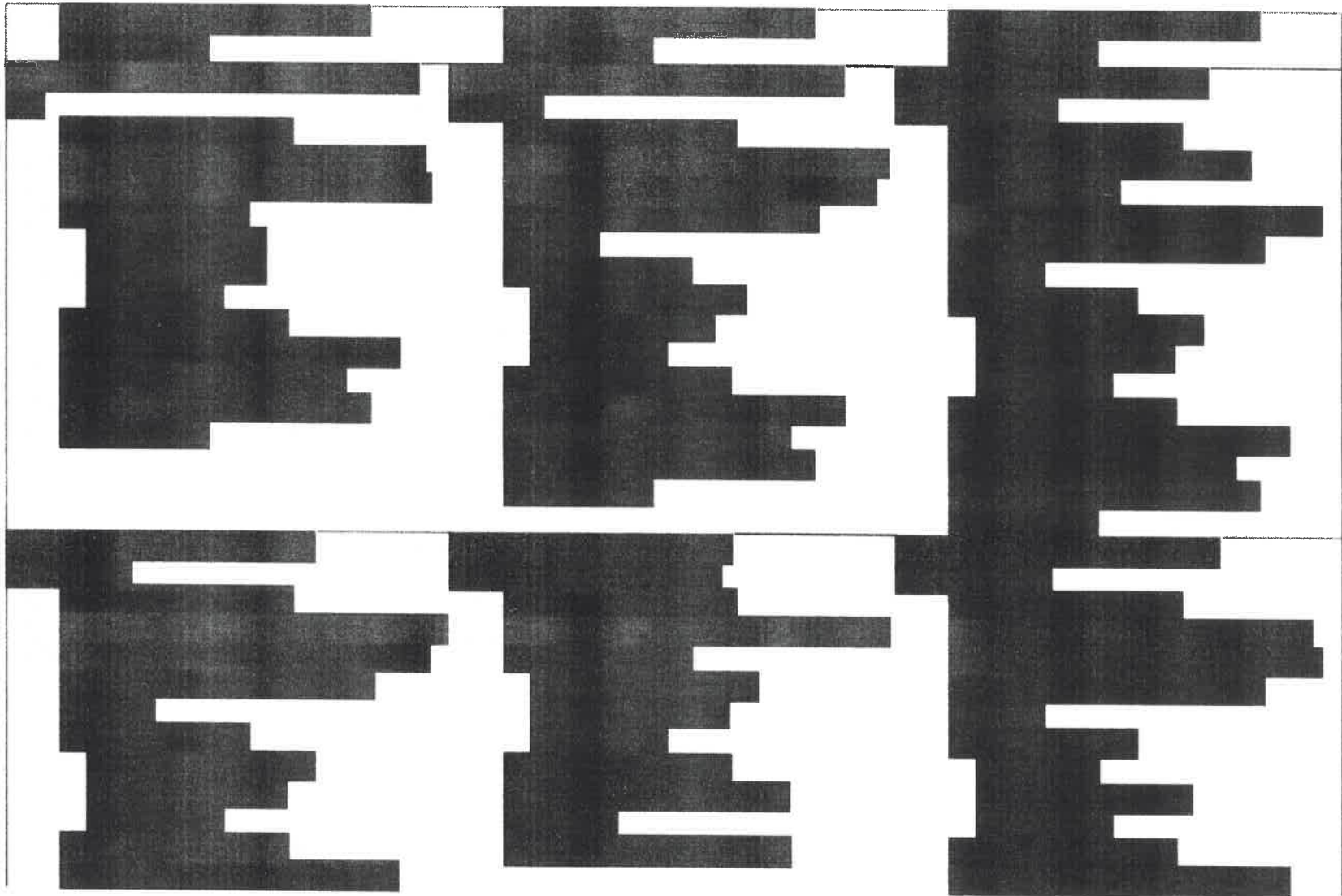


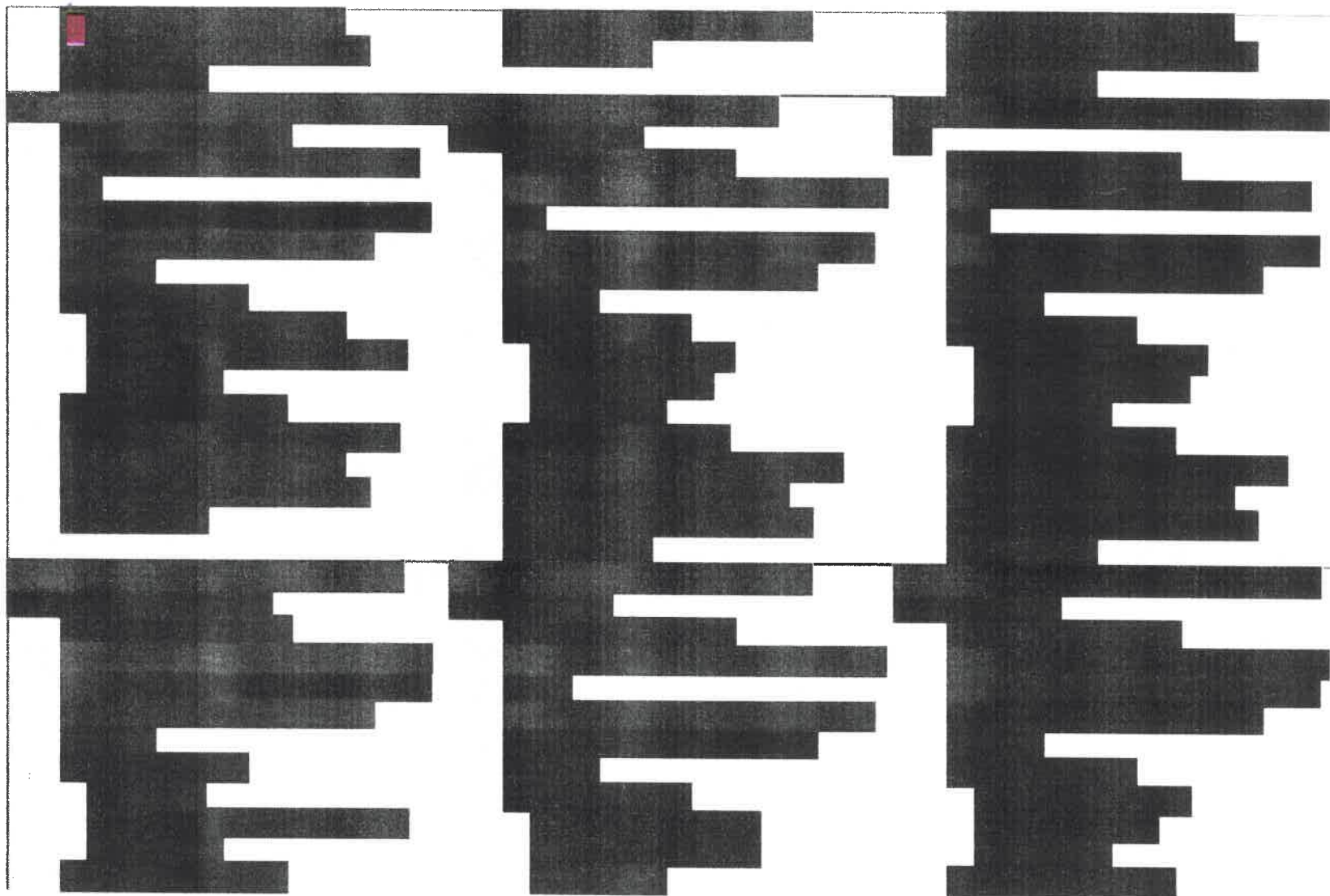
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[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

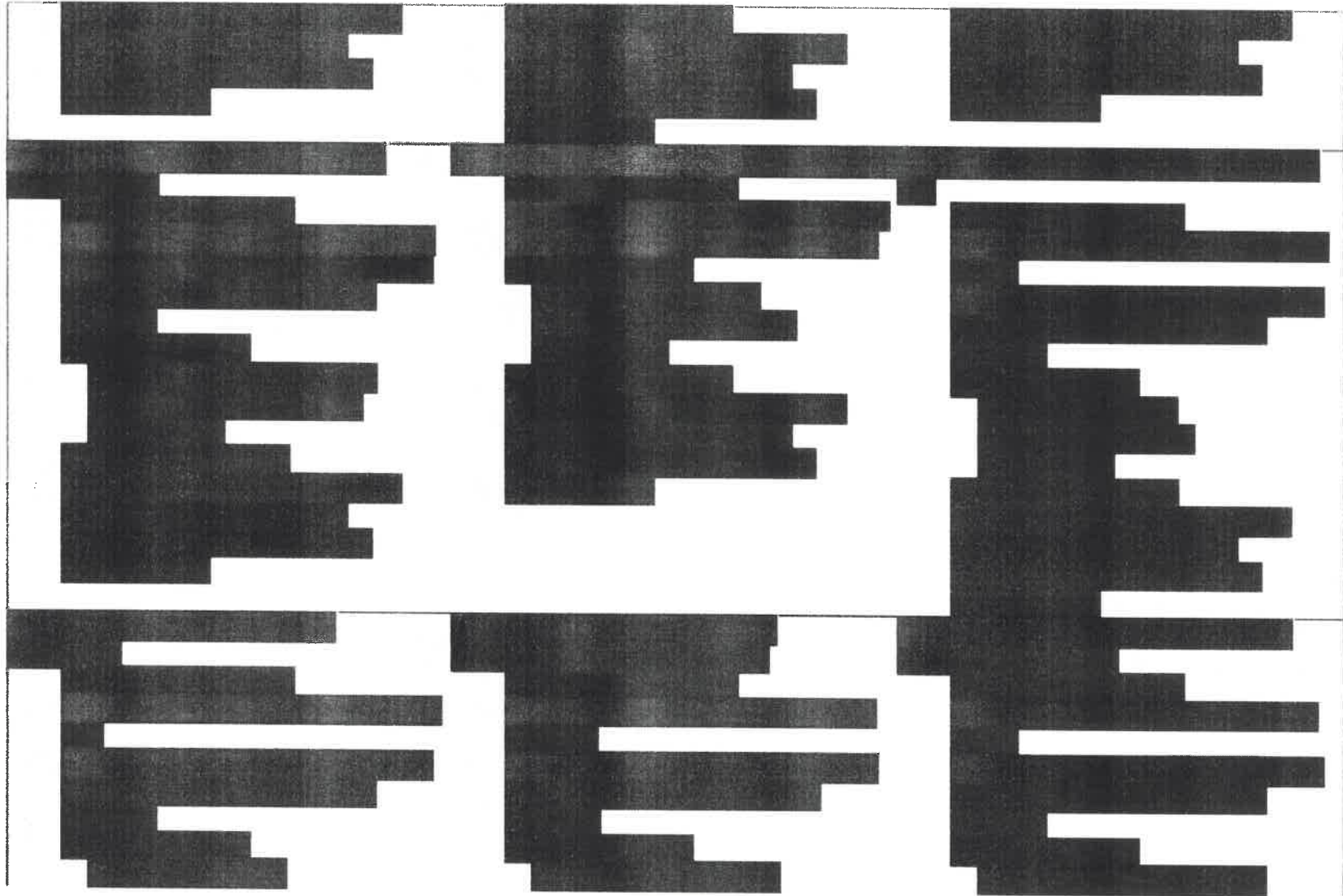


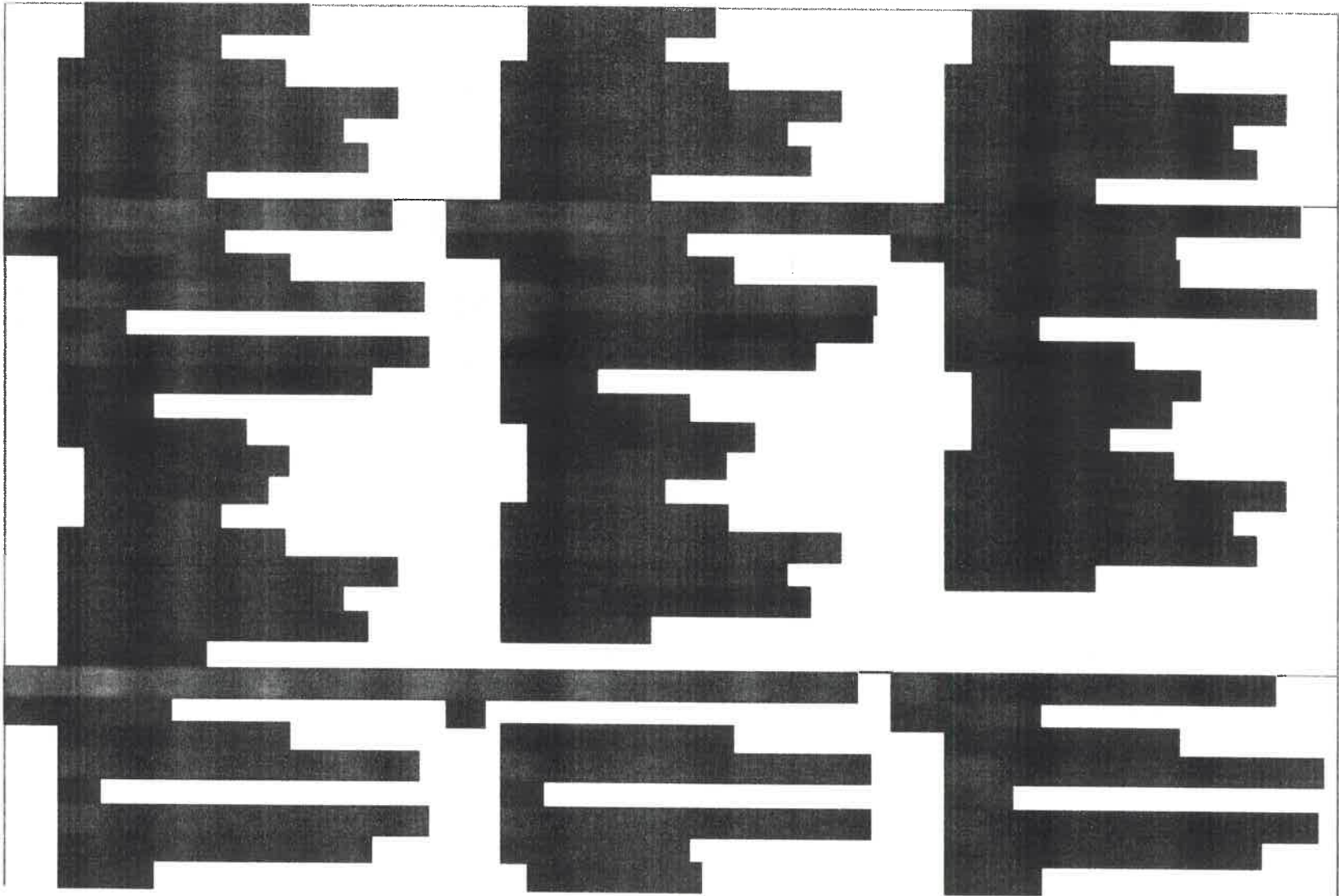






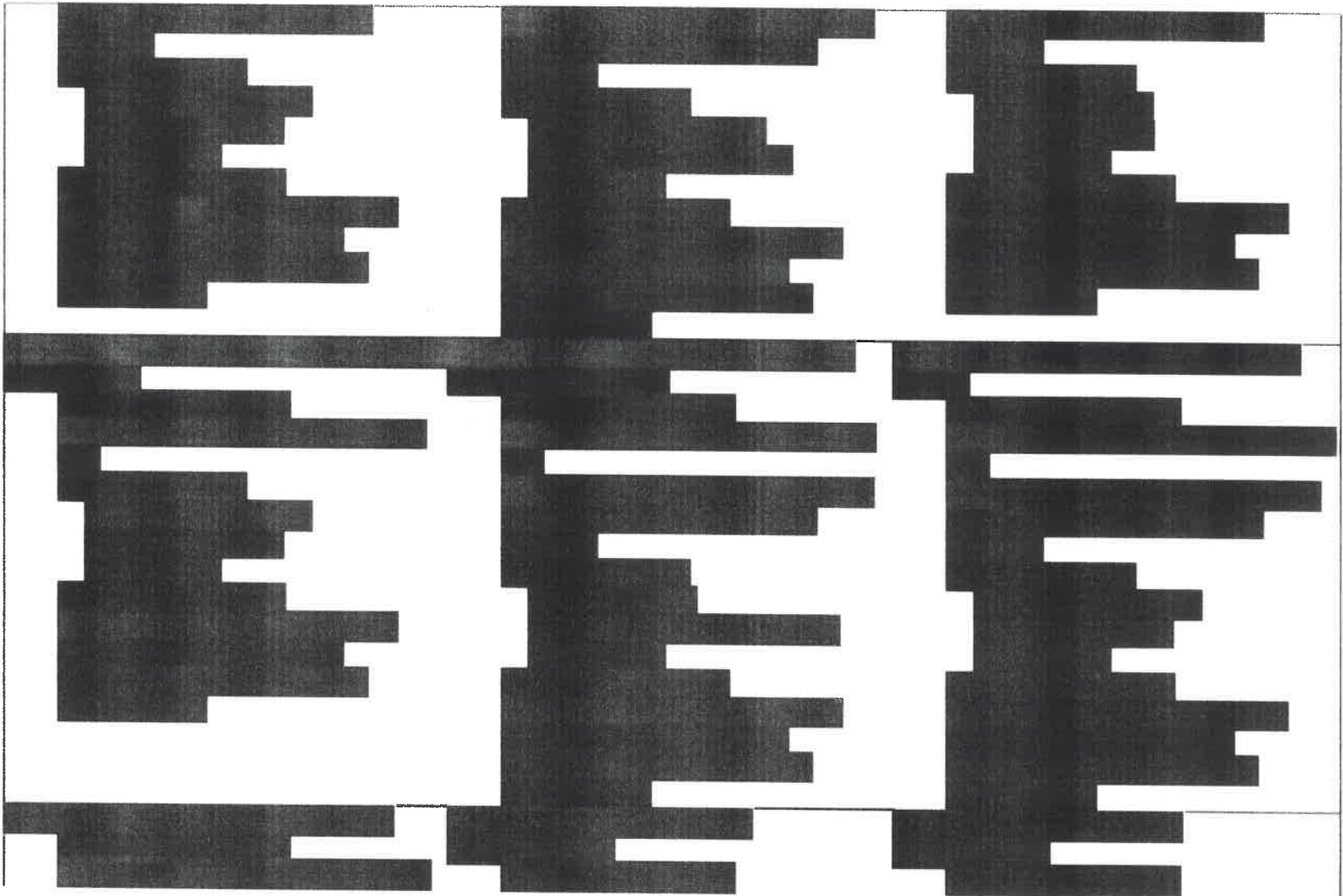


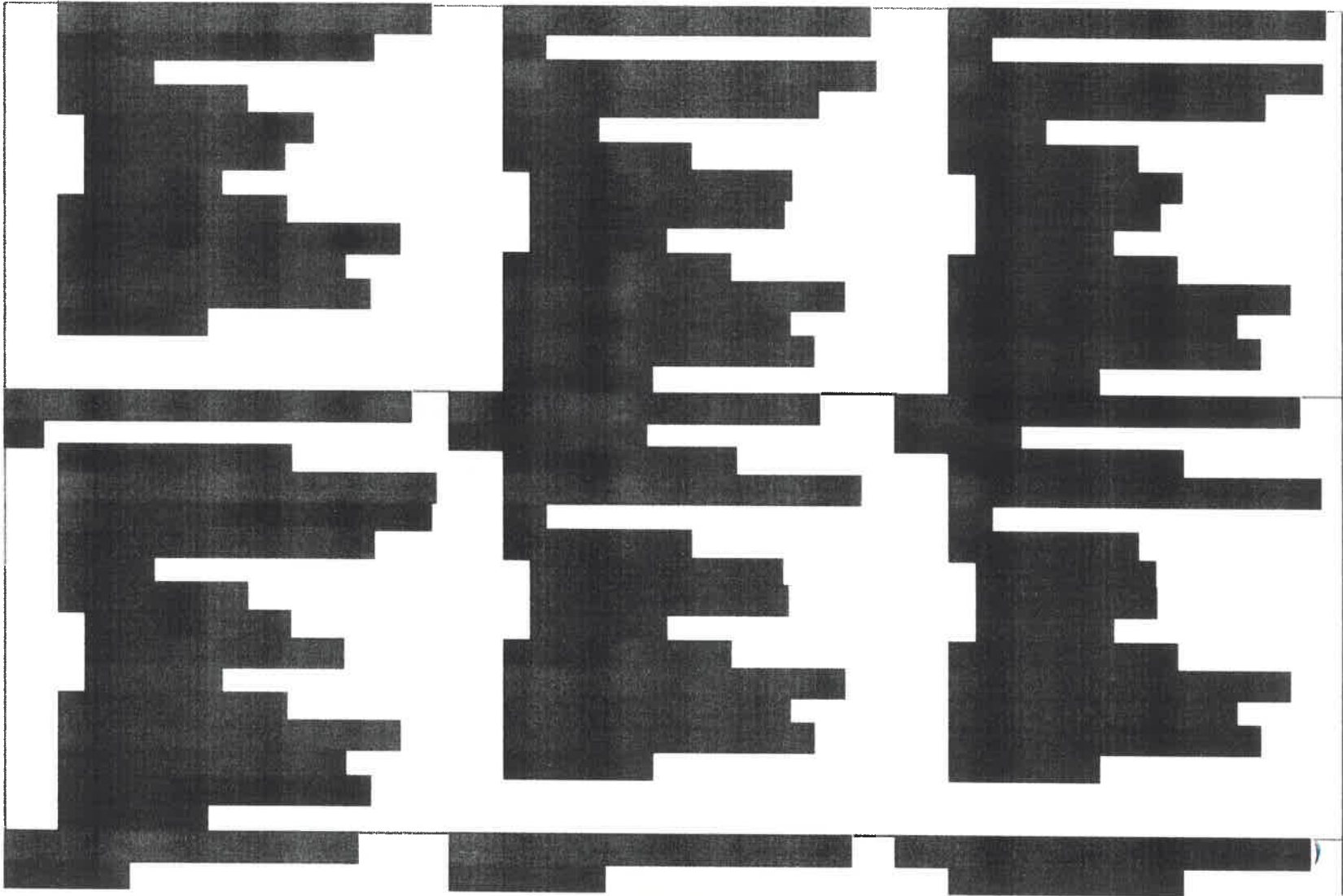




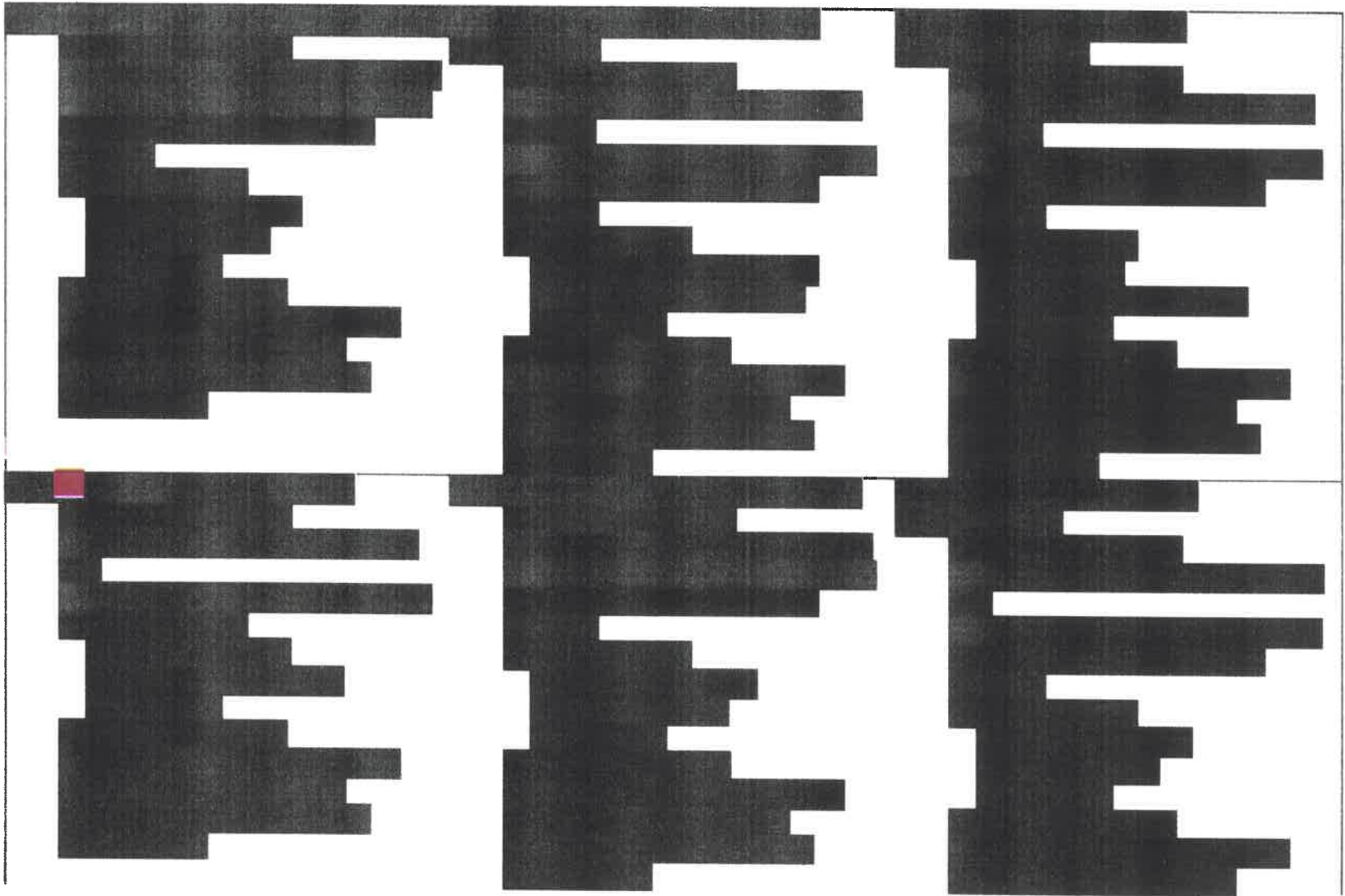


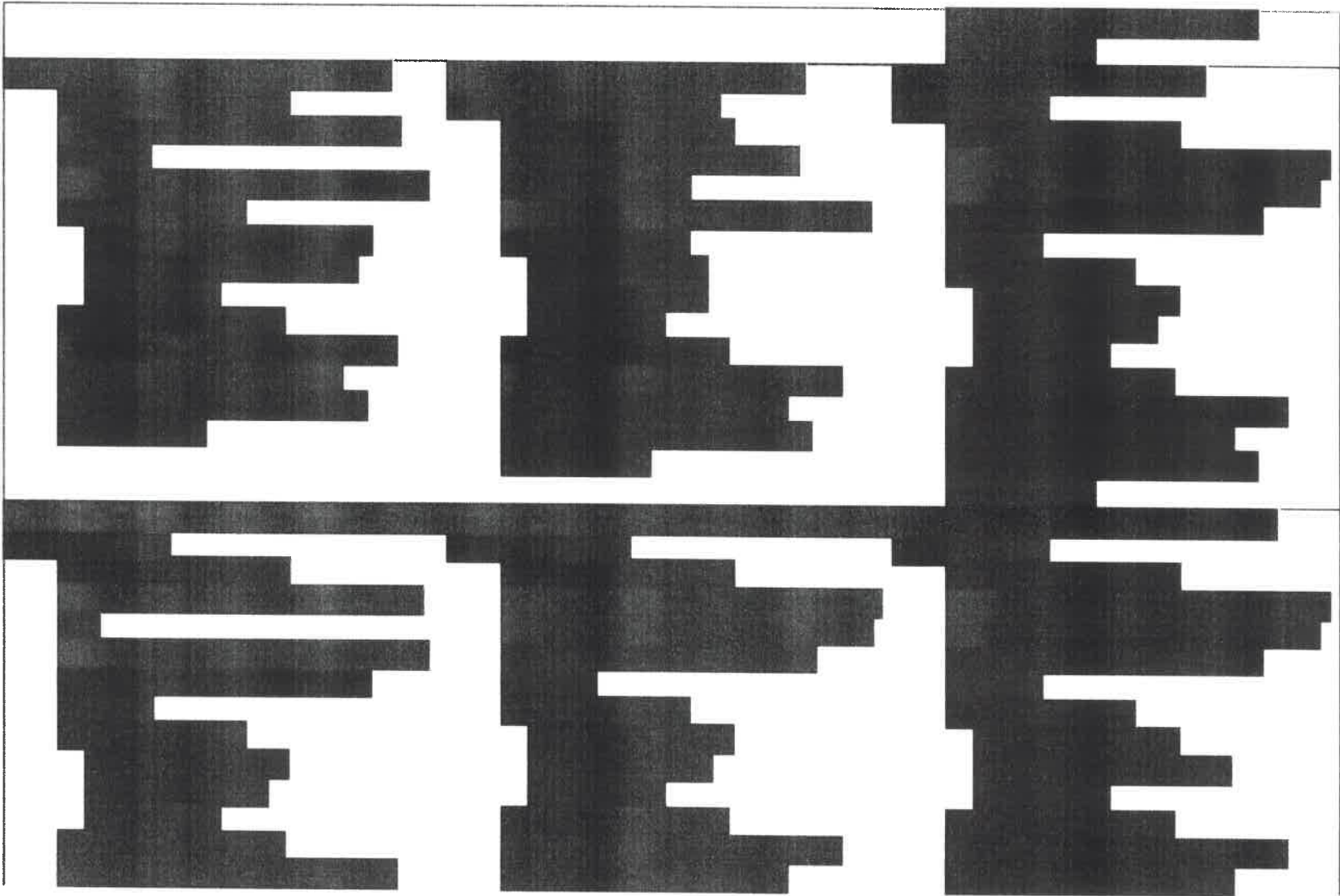


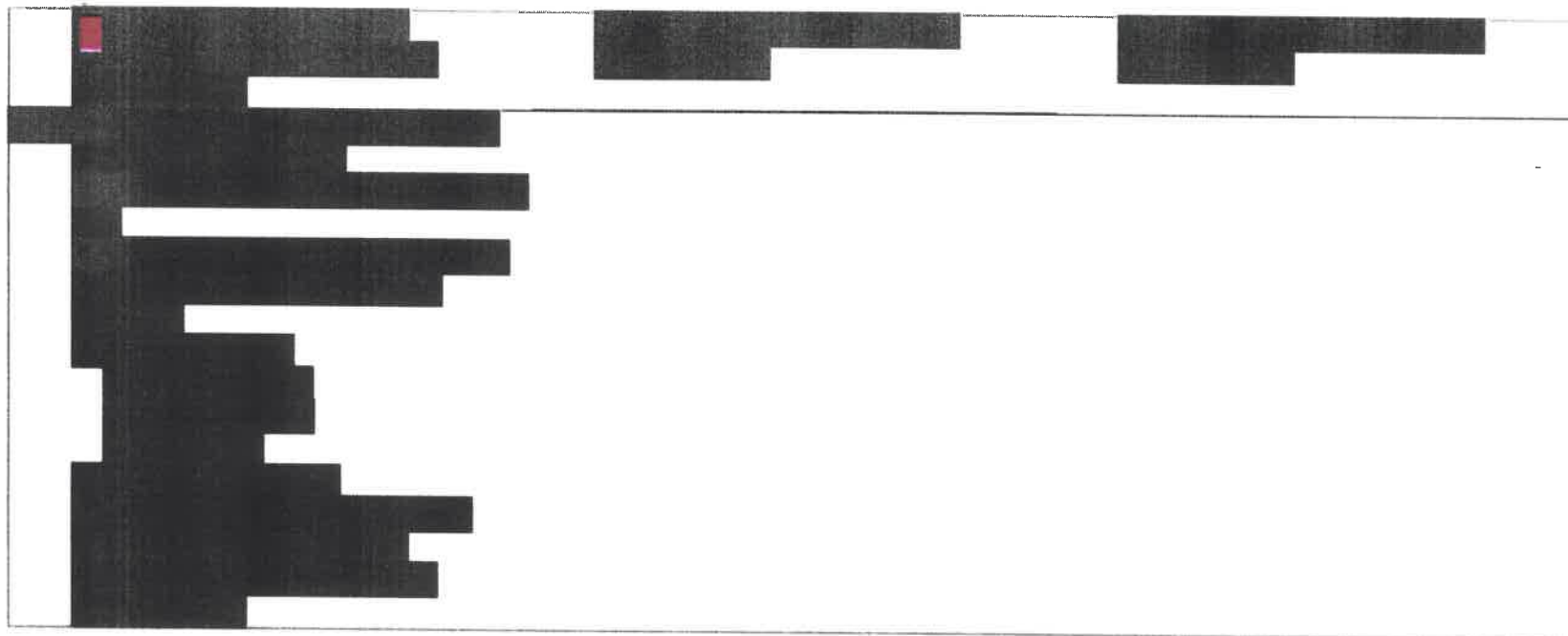












B. Appendix Associated Relationships

FL State EMP - East Region

Agility Recovery	Type: Vendor
Description: Provider of Agility Recovery Planner SaaS	
Street Address: 1225 17th St	Main Number:
20th Floor	General Email:
City: Denver	Main Fax:
State/Province: Co	Main Contact:
Country: United States	Web Address:
Region:	
Criticality: High	Alternate?: No

(Agility Recovery) Dugbartey, Jordan	(Agility Recovery) Dunn, Dusty
<u>Business Information</u>	<u>Business Information</u>
This record has no Business Information	Business Email: Dusty.Dunn@agilityrecovery.com
<u>Personal Information</u>	Business Phone: +1 (678) 333-3753
This record has no Personal Information	<u>Personal Information</u>
	This record has no Personal Information

DHS - FL CI	Type: Governmental Agencies
Description:	
Street Address:	Main Number: +1 813-227-2362
	General Email:
City:	Main Fax:
State/Province:	Main Contact:
Country: United States	Web Address:
Region:	

(DHS - FL CI) Gagnon, Ollie
<u>Business Information</u>
Business Email: Ovilla.gagnon@hq.dhs.gov
Business Phone: +1 (813) 227-2362
<u>Personal Information</u>
This record has no Personal Information

Duke Energy - Florida	Type: Governmental Agencies
Description:	
Street Address:	Main Number: +1 954-557-8135
	General Email:
City:	Main Fax:
State/Province:	Main Contact:
Country: United States	Web Address: https://outagemap.duke-energy.com/fl/default.html
Region:	

(Duke Energy - Florida) Burdin, Dustin
<u>Business Information</u>

Business Email: Dustin.Burdin@fpl.com

Business Phone: +1 (954) 557-8135

Personal Information

This record has no Personal Information

Florida Division of Emergency Management

Type: Governmental Agencies

Description:

Street Address: 2555 Shumard Oak Blvd

Main Number: +1 850-922-6437

ESF 2

General Email:

City: Tallahassee

Main Fax:

State/Province: FL

Main Contact:

Country: United States

Web Address: <http://www.floridadisaster.org/index.asp>

Region:

(Florida Division of Emergency Management) McBride, Danette

Business Information

Business Phone: +1 (850) 922-6437

Personal Information

This record has no Personal Information

Hillsborough County DEM

Type: Governmental Agencies

Description:

Street Address: 2711 E Hanna Ave

Main Number: +1 813-236-3800

City: Tampa

General Email:

State/Province: FL

Main Fax:

Country: United States

Main Contact:

Region:

Web Address:

(Hillsborough County DEM) Cook, Preston

Business Information

Business Phone: +1 (813) 236-3800

Personal Information

This record has no Personal Information

Hillsborough County Sherrifs Office - EM

Type: Governmental Agencies

Description:

Street Address:

Main Number:

City:

General Email:

Main Fax:

State/Province:
Country: United States
Region:

Main Contact:
Web Address:

**(Hillsborough County Sherrifs Office -
EM) Herron, Brad**

Business Information

Business Email: jherron@hcso.tampa.fl.us

Personal Information

This record has no Personal Information

Manatee County DEM
Description:

Street Address: 2101 47th Ter E

City: Bradenton
State/Province: FL
Country: United States

Region:

Type: Governmental Agencies

Main Number: +1 941-749-3500
x3501

General Email:

Main Fax:

Main Contact:

Web Address: <http://www.mymanatee.org/home/government/departments/public-safety/emergency-management.html>

**(Manatee County DEM) Culbreath,
Halie**

Business Information

Business Email: halie.culbreath@mymanatee.org

Business Phone: +1 (941)
749-3500x3501

Personal Information

This record has no Personal Information

Pasco County DEM
Description:

Street Address: 8744 Government Dr

Bldg A
City: New Port Richey
State/Province: FL
Country: United States

Region:

Type: Governmental Agencies

General Email:

Main Fax:

Main Contact:

Web Address: <http://www.pascocountyfl.net/Index.aspx?NID=365>

(Pasco County DEM) Johnson, J
Business Information

FRONTIER CONFIDENTIAL

Street Address: Main Number: +1 941-861-5000
City: General Email:
State/Province: Main Fax:
Country: United States Main Contact:
Web Address: <https://www.scgov.net/AllHazards/Pages/default.aspx>
Region:

<p>(Sarasota County DEM) McCrane, Ed</p> <p><u>Business Information</u> Business Phone: +1 (941) 861-5000</p> <p><u>Personal Information</u> This record has no Personal Information</p>
