February 15, 2018

Chairman Art Graham  
Florida Public Service Commission  
2540 Shumard Oakl Blvd.  
Tallahassee, FL 32399-0850

Subject: PFSC Docket No. 20170215-EU

Dear Mr. Graham

The City of Wilton Manors is pleased to submit the attached response to the Public Service Commission’s Request for Stakeholder Comments on the preparedness and restoration actions of electric utilities during the 2017 hurricane season. Wilton Manors appreciates the review being undertaken by the PSC and for the opportunity to provide information that will lead to meaningful improvements for our community.

Sincerely,

Leigh Ann Henderson  
City Manager

Attachment: Responses to Request for Stakeholder Comments

CC: Mayor and City Commission
Comments by the City of Wilton Manors on FPSC review of utility hurricane preparedness and restoration actions

FPSC Docket No. 20170215-EU

Vegetation Management

1. **What policies or practices can facilitate utility tree trimming and removal of problem trees along public road right of ways or easements?**

Ensure that local jurisdictions are fully aware of issues of vegetation conflicting with utilities and ensure proper policies are in place that mitigate or prevent tree and vegetation intrusion into utilities. The utilities should enhance oversight and management operations to mitigate or prevent tree and vegetation intrusion into utilities. Utilities may request and/or inquire about post-storm municipal assessments which may identify and help expedite the removal of downed/damaged trees.

Implement an aggressive, proactive schedule of tree trimming and notify local governments of the schedule and geographic location of the work to be informed. This would allow local governments to assist with sharing the information to the public and to be prepared to respond to inquiries or concerns.

2. **What policies or practices can facilitate utility tree trimming and removal of problem trees outside public road right of ways or easements?**

Again, provide local jurisdictions and property owners with advanced notice of scheduled trimming. Provide continued education to inform the public of proper tree and vegetation planting locations and the maintenance requirements. Implement local and/or county ordinances that would prevent or mitigate tree and vegetation intrusion into utilities. Inform code enforcement departments of the location of trees that the utility companies are not able to access so that they can work together with the property owners to provide access as local code departments may have a more personable relationship with the property owner/tenant.

3. **Describe how coordination with local utilities could be improved with regard to tree trimming, planting, relocating or removing trees.**

FPL, the electric provider for Wilton Manors and all of Broward County, can request to hold pre-hurricane conference calls with municipal staff that oversee landscaping as well as their contractors. Hurricane preparedness seminars could also be held to include multiple municipalities.
Undergrounding of Electric Facilities

4. What policies or practices could facilitate the undergrounding of existing overhead electric facilities?

FPL should devise a plan to transition overhead utilities to underground and identify ways to mitigate the costs to its customers. It would be helpful for utility companies to conduct a thorough and complete cost benefit analysis of undergrounding utilities in coastal or hurricane-vulnerable communities. The study should include costs savings from tree pruning, restoration, and extended outages. Ensure that the analysis is reviewed and tested by an impartial second party and shared with local jurisdictions.

The City of Wilton Manors requests new development in the city to underground the utility lines. However, as a built-out community, the vast majority of the city’s utilities are overhead. The conversion of the overhead lines to underground is cost prohibitive to local governments and property owners, those that are primarily responsible for bearing the expense.

5. What policies or practices could facilitate undergrounding electric facilities in construction of new electric facilities?

Local ordinances requiring undergrounding of new development would facilitate undergrounding of new service lines.

6. Describe how the process used to interact with utilities on projects to underground electric facilities could be improved?

Additional resources for engineering and design and expedient scheduling of undergrounding would improve the process.

Coordination and Communication with Utilities

7. Explain the process to identify and inform electric utilities of local critical facilities and infrastructure, and describe options to improve the process.

FPL maintains a list of critical facilities and infrastructure in Broward County. The City should be part of the process of updating and maintaining this list. During Hurricane Irma, three nursing homes in Wilton Manors experienced extended power outages, compounded by extreme weather temperatures. Communication with FPL requesting immediate attention was responded to with the answer that nursing homes were not classified as critical facilities. Overall communication could be improved.
8. Describe how electric utilities interact with local emergency operations centers during emergencies, and identify opportunities to improve the interaction.

FPL staffs the Broward County EOC during a storm. FPL assigns a single point of contact for all Broward municipalities. During the restoration period, the majority of communication occurs through that representative.

Residents and businesses within Wilton Manors are accustomed to contacting City Hall staff and elected leaders to resolve quality of life issues. After Hurricane Irma, the City received an overwhelming number of calls and requests from our community members regarding power outages, to which the city could not provide resolution. Constituents were frustrated due to the lack of information available from FPL. The time spent managing utility issues diverted staff resources that were needed for managing the City’s post-storm responsibilities.

The City did not receive any information about restoration schedules that could be shared with our community. The primary information made available to the City was the number of accounts restored and the number of accounts still without power. That information was updated frequently but did not provide any geographic detail or timetable for repairs.

There is no process for the City to log and report outages to FPL, nor is there a system for FPL to update the City on detailed restoration efforts. Implementing a work order or ticket order system would allow information received by municipal officials to be submitted and recorded. Utility companies may develop a website that cities can log into that would provide live mapping of outages and repair efforts that would enable city leaders to respond with some degree of information to their constituents.

9. Describe options to address communications with utilities prior to, during, and after a storm event.

Providing additional communication resources for local governments would be incredibly useful. Assign additional personnel to provide meaningful, detailed information on restoration efforts and to receive information from cities on outages and downed lines. Technology resources for tracking restoration efforts are needed.