February 14, 2018

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

Public Service Commission
Docket No. 20170215-EU

Re: Review of electric utility hurricane preparedness and restoration actions – Request for Comments

The following are comments requested by the Office of the General Counsel. Thank you for this opportunity to comment on the Florida electric utilities hurricane preparedness and restoration.

Sincerely:

C. Kenneth Poole, Public Works Director

Cc: Dr. Brenda Fettrow, City Manager
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?
   Comment: A well in advance survey by qualified personnel to list potential trimming and or tree removal and include the City of Rockledge with the survey. A joint meeting onsite of the potential problem areas may result in an effort to implement Best Management Practices, BMP's.

2. What policies or practices can facilitate utility tree trimming and removal of problem trees outside the public right of ways or easements?
   Comment: This more than likely would be private property. A notice to property owners of potential hazards in a storm event and a call line for property owners to request a meeting to discuss solutions with the electrical utility personnel.

3. Describe how coordination with local utilities could be improved with regard to trimming, planting, relocating or removing trees.
   Comment: The City of Rockledge does receive notices for planned tree trimming from the electrical utility showing areas and schedules for this activity. Known problem areas could be assessed more often and given additional attention.

Undergrounding of Electrical Facilities

4. What policies or practices could facilitate undergrounding existing overhead electrical facilities?
   Comment: This is an expensive undertaking. Explore the possibility of shared costs by grant funding.

5. What policies and practices could facilitate undergrounding electric facilities in construction of new facilities?
   Comment: The City of Rockledge has ordinances and regulations for undergrounding of electrical services in new subdivision developments. Research a method for commercial development to have undergrounding of electrical services

6. Describe how the process used to interact with utilities on projects to underground electric facilities could be improved.
   Comment: For new development this is primarily coordinated by the developer. One big improvement would be the availability and installation of street lights in the subdivisions. Street lights have lagged behind for months.
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.
   Comment: The process has been to call a contact number given by the electrical utility. It appears that there is no difference in critical facilities for the City of Rockledge than any other power outage call. Basically these calls go unanswered. More response is apparent toward the end of the storm event.

8. Describe how electrical utilities interact with local emergency operations centers during emergencies, and identify opportunities to improve that interaction.
   Comment: The Electrical Facilities representative did not act as a decision maker but more of a task order/request for work order personnel. The communication of knowledge for real time events was lacking in that there was no current status, updates, or estimates of time for restorations. An improvement would be to have a representative that has contact with a field representative and contact with management for the plan of action.

9. Describe options to address communications with utilities prior to, during, and after a storm event.
   Comment: Prior to a storm event I would suggest a test of phone, text, and email communications to ensure that all involved are up and working. During a storm event it would be beneficial to have a representative in each Brevard County EOC. After a storm event, compile reports of power restorations that could be used for public communications (PSA). For debris removal, an “all clear” crew to check power lines in downed debris for a more efficient removal operations.