

Review of Electric Utility Hurricane Preparedness and Restoration Actions

Docket No : 20170215-EU

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Electric Utility Provider : EI802 - Florida Power & Light Company

Zip Code : 32092

Category : Other

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“Comments by St. Johns County, Florida on FPSC Review of Utility Hurricane Preparedness and Restoration Actions”

Docket Number 20170215

### 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? Utilities Companies serving St. Johns County currently have strict regulations in place. Preventive maintenance programs called LINE CLEARING prune or trim branches and limbs that are a safety hazard or could cause power outages. The amount of pruning and/or trimming varies by tree and location. In some cases a V-shape is cut into the tree and this is called DIRECTIONAL PRUNING. This enables and directs the tree to grow away from power lines. All utility companies currently follow the American National Standard Institute (ANSI) A-300 directional pruning guidelines. This standard is endorsed by the International Society of Arboriculture (ISA). Another aspect of the utility companies' practices is their LINE CLEARING SCHEDULE. Main power lines (feeders) are cleared every three years and the neighborhood power lines (laterals) are cleared every six years. The LINE CLEARING SCHEDULE is scheduled before the height of storm season in order to minimize damage during storm events. There are NO charges to the customers for this service. Trees , palms and other fast growing vegetation sometimes are completely removed when they cannot be managed effectively by pruning or trimming. Notifications are sent to all residents effected by the LINE CLEARING approximately two weeks in advance. For more detailed information regarding these procedures residents can visit the web-sites for both FPL and JEA. Easements owned by the utility companies are treated in the same manner.

2.What policies or practices can facilitate utility tree trimming and removal of problem trees outside public road right of ways or easements? Currently Government agencies and utility companies do not encroach onto PRIVATE PROPERTY or privately owned easements due to legal issues associated with such. However, any trees that appear to be in danger of damaging power lines within the area are looked at on a case by case basis. If the utility company feels removal of the subject tree/trees needs removing outside the right-of-way or within an easement in order to prevent damage to their system, then an agreement with the property owner must be received in order to encroach onto private property.

3.Describe how coordination with local utilities could be improved with regard to tree trimming,

planting, relocating or removing trees. A program could be enacted in order for local and state agencies to notify the utility companies of an imposing danger if a program does not already exist. However the utility companies already have an 800 number in place for all residents/concerned citizens to call with concerns.

#### Undergrounding of Electric Facilities

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

Policies and practices for converting overhead to underground facilities would be an easy task. Practices are already in place but a creating firm policy is a very expensive undertaking. For example, converting approximately 1 mile of existing overhead facilities to underground would cost approximately 2 million dollars plus. That cost does NOT include the cost of easements for transformers where right-of-way is not sufficient. In addition there would be additional cost that would be occurred for cable and phone services to be converted to underground.

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

All new subdivisions located within St. Johns County already have that policy/practice in place. All electric, cable and phone services are located underground in a dedicated utility easement and the electric transformers are also installed within that dedicated easement. For new electric facilities not within a subdivision please see the response to Note 6.

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

To avoid the high cost of converting existing overhead to underground facilities some electric power companies; such as FPL, are doing county wide HARDENING PROJECTS. With these hardened facilities the poles, equipment and electric wiring connections are able to withstand higher wind loads than used in the older systems. Hardening is a much less expensive alternative to relocating facilities underground.

For new electric facilities, not located within subdivisions, that would normally be aboveground along roadways and highways, communication with the utilities would be critical in advance of any planning/design phase for any and all projects. Cost sharing would have to be discussed unless other funding sources were made available to the power companies and utility companies. Such a requirement itself, if required, may result in rate increases to the utility customers, Counties and State.

#### Coordination and Communication with Utilities

7. St. Johns County has two primary utility companies that serve our geographic area, Florida Power and Light (FPL) and Jacksonville Electric Authority (JEA). Both companies have been long standing partners with St. Johns County Emergency Management and are included in our Comprehensive Emergency Management plan as Emergency Support Function -12 (ESF-12).

St. Johns County EM carefully reviews are critical facility list each year using EM staff and also the Local Mitigation Strategy Committee to identify any new facilities.

St. Johns County EM meets with each Utility provider prior to the start of the Atlantic Hurricane Season to discuss critical facilities, EOC operations, internal and external communications and exchange any new staff contacts. The face to face meetings provide each group an opportunity to share new policies and procedures, plus update pertinent disaster plans. We make sure to include newly constructed schools that are identified as evacuation shelters to the critical facility list. Each Utility Company provides SJCEM a list of the current critical facilities and we review the list together for additions and deletions. Deletions are made when a facilities function has changed or the facility has aged out of use.

St. Johns County EM does not have any options for improvement on this issue.

8. The St. Johns County Comprehensive Emergency Management Plan clearly identifies the Utility Companies as lead agencies for ESF-12, as stated above. The Utility Companies have designated staff that attend planning meetings, training classes, and exercises in the EOC. SJCEM conducts an all day functional exercise the first week of June each year and the Utility Companies' staff attend. The annual event draws 120-200 disaster personnel. Utility Staff have also presented their operational plans several times to the EOC and also at our Monthly Evacuation Meeting in the EOC to share their experiences. Both Utility Companies also invite SJCEM to participate in their annual exercises too.

The Utility Companies staff ESF-12 when the EOC is activated for all hazards. For example, during Hurricanes Matthew and Irma, both Utility Companies manned the EOC 24 hours a day providing power outage updates, tracking down critical issues, and conferencing with local officials on priorities/timing. For Hurricane Matthew, the EOC was activated for 23 days and Irma, 14 days. The Utility Companies were one of the first agencies to arrive and definitely the last to leave. Both Utility Companies strive to provide detailed information to Emergency Management and are proactive with sharing concerns and successes with us. FPL and JEA use software to monitor outages and frequently provide updates to the Planning Section for reporting. They are partners in the EOC working alongside EM.

St. Johns County EM does not have any options for improvement on this issue.

9. St. Johns County Emergency Management communicates with the Utility Companies in meetings, by email, and telephone calls. Both Companies have conducted formal AAR presentations to our Monthly Evacuation Meeting following Hurricane Irma. We have developed a working relationship that allows us to pick up the telephone if we need information or have any kind of power restoration issue. We communicate throughout the year to ensure we are all on the same page working towards the same mission, assisting the residents of St. Johns County.

St. Johns County EM does not have any options for improvement on this issue.