

DUNEDIN
Home of Honeymoon Island

February 7, 2018

Chairman Julie Imanuel Brown
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Subject: **Docket 20170215-EU**: Review of Electric Utility Hurricane Preparedness and Restoration Actions – Request for Comments

Dear Ms. Brown:

The City of Dunedin is pleased to submit, pursuant to Public Service Commission (PSC) letter request of December 19, 2017, our response to your topic questions posed on the subject docket. Like everyone, we seek to minimize infrastructure damage, business interruptions and economic impacts in our local community and the state of Florida which might otherwise be avoidable if proactive actions and preventative measures by electrical utilities are regularly exercised.

Thank you for the important and comprehensive review you have undertaken on this subject and the opportunity afforded us as interested stakeholders to share our thoughts.

Sincerely,



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Attachments: 1) Response to Questions
2) Dunedin Ordinance 104-53.4

Cc: City Commission

February 7, 2018

Docket No. 20170215 – EU
Review of Electric Utility Hurricane Preparedness and Restoration Actions
Public Service Commission Request for Information
December 19, 2017 Letter of Memorandum
Wesley Taylor, Office of the General Counsel

Following is the City of Dunedin's response to questions posed by the Public Service Commission to Docket No. 20170215 – EU.

FPSC 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?

Implementing proper ANSI A-300 pruning standards when utility companies perform their preemptive or line clearing trimming. Rather than topping or one-sided a tree when performing utility pruning, possibly work with local government arborists to remove these trees where permissible. Stub cutting or use of a heading cut seems to only be a temporary fix to provide line clearance because the rapid epicormic (sucker) growth is magnified. Utilizing proper collar cuts, or cuts back to secondary laterals would drastically reduce the need to prune the same tree in the future. Properly training trees near utility lines by use of proper pruning techniques could reduce the number of limb failures and further reduce the time spent pruning such trees in the future. All viable trees and palms not on the Florida Exotic Pest Plant Council (FLEPPC) list should be adequately preserved using ANSI A-300 Pruning Standards. Utility companies should be encouraged to remove any trees or palms listed on the FLEPPC list, as this will reduce power outages and cyclical tree work needed in the future.

Provide local urban forestry departments, and municipal arborists' adequate notice and details of the locations, schedule, and scope of work to be performed. This will eliminate any miscommunication and allow further protection of protected trees, grand trees, and historic trees. Currently the City of Dunedin's Public Services Department and Arborist are not being notified when work is scheduled within its city limits. Providing upcoming schedules to local municipalities would be tremendously helpful with any public inquiries or concerns. Furthermore, most utility companies are regulated at the state or federal level; it may be beneficial for utility companies to further understand local municipal tree ordinances as they pertain to tree trimming or removals. This could allow municipalities the opportunity to provide public notice via their publishing materials, websites, or other social media outlets.

Tree trimming is problematic for utility companies. Economic pressures may encourage a cycle of trimming which is less than optimal. Longer cycles result in greater tree trimming at time of pruning. Longer tree trimming cycles also leave overhead systems at greater risk for an outage.

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

Provide property owners, business owners, and municipalities advance notice of scheduled pruning. Educate citizens and business owners on the type of pruning to be performed, and the necessity of this pruning. Also, educate property owners and business owners on the negative effects that hazardous trees and palms may impose, including species on the FLEPPC list, and remove such trees and palms. Provide information and public discussion forums on planting the right tree or palm in the correct place. Many times homeowners are not aware of the future size of a tree or palm and mistakenly plant them in a problematic location for utility companies. Educational brochures can be distributed with utility bills, and at the local municipal level for further education should they be provided. Although most utility companies are regulated at the state or federal level, it may be beneficial for utility companies to further understand local municipal tree ordinances as they pertain to tree trimming or removals.

Further, educate and/or seek regulation of the nursery industry at the state level to reduce the planting of inappropriate species beneath utility lines. Propose county and municipal governments adopt model tree ordinances prescribing best practices for plantings near or beneath utilities. Consider a tree removal mandate on egregious property owners who cause recurring outages. The property owner can be given an option to pay the utility for the tree removal over time by way of their utility bill, or solicit quotes themselves if such is cost-effective. Consider establishment of a statewide tree bank to fund removal of problematic vegetation. Potentially fund the nuisance tree "removal" bank from a utility bill surcharge on customer billing statements, a tax on utilities, a special assessment within a utility franchise fee agreement created when said agreements come up for renewal, from state-designated funding or a combination thereof.

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

Creating a professional committee of local utility pruning supervisors, municipal supervisors, municipal arborists, and other pertinent public and private individuals, could allow a sense of transparency and harmony as it pertains to the impacts that all parties face with utility pruning. A lack of adequate notice to the public regarding utility tree trimming seems to foster a culture of distrust from our citizens. Thorough and advance utility pruning notification provided to private property owners, business owners, municipal urban forestry departments, and municipal arborists could reduce this stigma. Also, providing a real time contact person for easily available for any private or public concerns. If citizens were provided the pruning

supervisor or foreman's contact information this could streamline any pertinent questions and reduce the anxiety levels when tree pruning concerns arise.

Prune according to ANSI-A300 standards where applicable, educate tree owners on the pruning techniques being used, educate tree owners on the negative side effects of hazardous and exotic invasive trees. Encourage property owners to plant trees in the right place and offer a tree planting program to reduce or mitigate any net tree canopy net loss from utility pruning. Relocating trees would reduce the amount of time, and money spent to continually prune the same tree or palm over the years. Encouraging utility companies to remove instead of pruning trees that are hazardous, dead or dying, or species on the FLEPPC list, will reduce power outages, insurance claims, and utility trimming budgets.

Undergrounding of Electric Facilities

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

The City of Dunedin has adopted an ordinance requiring underground of utility construction in NEW development. For existing overhead electric facilities, the City could decide to retroactively require compliance with this ordinance (LDC 104-53.4 attached). However, retroactivity is not consistent with our Franchise Agreement and would likely face strong opposition from the utility industry without just compensation.

The City has never been presented with a peer review report on the merits or cautions of undergrounding overhead utilities in a hurricane-prone region. Understanding the technical tradeoffs between the two would be beneficial for regulators and elected officials. Often times it is simply a matter of costs; an initial up front cost comparison between the two without an analysis of life cycle costs or infrastructure vulnerability. When factoring in the repetitive cost of tree trimming, the impact from extended outages to the economy of a region, lost profits by the utility and shareholders, and recovering the undepreciated value of existing overhead infrastructure, etc., policymakers can then make better informed decisions for their constituents and stakeholders.

It would be helpful to establishing a requirement, based on some agreed-upon metric, for utilities to underground existing, outage-prone areas. This would be especially true in challenging areas such as rear yards where access is problematic, or in business districts which experience frequent interruptions (including short-duration fair weather outages). Taking a cost/benefit approach to addressing the "low hanging fruit" is a good first step in achieving an environment of clean and reliable power.

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

For new development, the City currently requires undergrounding power per LDC 104-53.4 (see attached ordinance). If the power company has not done so, they could also make this a requirement for new service placing the burden on the property owner and/or developer as a condition of service. Consider creating a statewide model ordinance for undergrounding electric facilities in new construction, supported by the Florida League of Cities and utility industry, for adoption.

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

The power company should be required to follow the same processes as other utilities. For example, they should obtain permits for work within the City, and provide all supporting documentation associated with a permit (i.e. Maintenance of Traffic plan, Site Plan, Schedule, etc.).

The power company could assign two contacts (a primary and secondary) per project. At least one of the contacts could be required to remain on the project until completion. A power company representative could attend City held meetings related to development and/or Capital Improvement Plan's (i.e. Development Review Committee meetings / Pre-Construction meetings, etc.).

The power company could institute a work order system in which municipalities enter tickets for routine issues, while emergencies could be handled with a phone call. Improve communication overall.

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.

From an Emergency Management standpoint, the City provides Duke Energy annually with an updated inventory of critical infrastructure for priority restoration in recovery operations. Such includes the local hospital and health care facilities, first responder fire stations, water and wastewater infrastructure, etc. In turn, Duke Energy has provided the City's Emergency Operations Center (EOC) with a grid map showing substations and associated circuitry affording the City with a greater understanding of outage impacts. This has been an effective exchange of information. Dunedin's challenges have not been poor prioritization of power restoration as much as it has been the extent of outages, response times to outages, and communication during power restoration activities.

8. Describe how electric utilities interact with local emergency operations centers during emergencies, and identify opportunities to improve that interaction.

During Hurricane Irma, the City EOC was submitting requests for assistance to the power company through the County's EOC software program, WebEOC. There was only one response from the power company during this process and it was very late after the storm had passed. Our Fire Chief, as Incident Commander, personally spoke to the power company representative at the County EOC regarding this one incident and he was very willing to help. Other than this one communications exchange, there was no interaction between our City EOC and the power company and many of our needs for power restoration went unanswered for days.

It was clear that Duke's outage management software system was overwhelmed and could not provide regular notifications and updates to decision-makers or the general public. As such, embedded Duke staff within the County EOC could not provide accurate information and "all clear" site verifications. The inability to know when lines were cleared by Duke delayed recovery operations by the City and/or residents leading to frustration. It also appeared that Duke could not, or would not return calls to elected officials, in part perhaps, from a lack of real-time information or because of the need to prioritize returned telephone calls. Regardless, some Dunedin elected officials felt ill prepared to respond to their constituents in any constructive fashion.

For Dunedin, two initiatives to improve our interaction with Duke are 1) for Duke to further advance their outage management software capabilities to handle greater inflows of information, and 2) for Duke to embed representatives within the City's EOC.

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

➤ Pre-Event

Pre-event communications were limited to normal and customary topics from a business perspective. We do not recall any specific communication from Duke Energy in advance of the storm advising of courses of action or changes in methods of communications. It was business as usual. However, we know from our emergency management efforts with Pinellas County that Duke representation would exist at the County EOC for coordination purposes with all the local municipalities.

A pre-event email distribution by Duke Energy, identifying preferences for emergency contacts for elected officials, opportunities or offers for embedment at City facilities, recommendations or samples of public information for disbursement by the City to residents and the business community on what to expect or how to respond would have been helpful. The City would have utilized such information on its website and through social media outlets to inform a community that would soon be desperate for

information. Housing a Duke Energy response truck and crew at each of our three (3) fire stations to assist with the First Push debris clearing would be very beneficial.

➤ During the Event

During Hurricane Irma the City relied upon the pre-established, direct line of communication between the City and the County through the County's WebEOC and twice-daily online check-ins with the County from our EOC for information. In honoring the County's desires to centralize command and control for efficient deployment of resources, the City deferred to the County on all issues occurring real time without reaching out to Duke Energy directly.

➤ Post-Event

During recovery operations, the City relied upon requests for line clearances and update on power outage restorations made through the County's WebEOC. As the length of the outage continued, a restless community sought answers on delays on road clearing and restoration of power. Line clearing of tangled wires was necessary for the safe movement of debris and removal of downed trees/limbs. Securing answers so that workers could do their jobs was problematic. Communications between the City and Duke's mutual aid crews in the field were made difficult due to the complexity of communications between the mutual aid crews and Duke themselves.

"Why is nothing happening", and "when will power be restored" were questions often posed to elected officials who were unable to respond satisfactorily to their constituents. Calls placed to high ranking Duke Energy executives assigned to Dunedin were left unanswered. Often times, cell phones would not accept messages as voice mail boxes were full and unable to take a message.

Having a separate process to log reported power outages from the City EOC directly to Duke Energy would give Duke Energy a more realistic idea of what is occurring in our City. Having increased communications between the City and Duke Energy to give real-time updates on the status of what is being addressed or scheduled to be addressed would be helpful. If Duke Energy knew what our priorities were in the City after the storm it could have led to a smoother and perhaps quicker return to normal for us.

Closing Comments

It should not go unstated that Duke Energy had an extensive challenge before them given the far-reaching degree of damage experienced by their infrastructure from Hurricane Irma. The magnitude of this problem, and the logistics required to address it, were met with determination by Duke Energy and their mutual aid responders. They are to be commended for that effort. Dunedin's comments to the questions posed by the PSC are not meant to be finger pointing at an organization that was indifferent to its customer's plight, or totally ill prepared for the case at hand. To the contrary, Dunedin's comments are meant as constructive input as

seen from our perspective, and our perspective alone. Our comments may seem simply self-serving. Perhaps they are given the extent to which they are formulated from the viewpoint of our residents, business community and City staff. However, we are not privy to the details and experiences of others. That greater, holistic perspective is best left for the PCS to obtain through Docket 20170215-EU fact-gathering, and for which we are sincerely appreciative.

As for Dunedin, we seek to develop a deeper and more meaningful partnership with Duke Energy going forward. Only through cooperation and coordination between government, the PCS and the utility companies can improvements to disaster plans and preparations be realized. The adoption of best practices within the industry, coupled with an investment of meaningful capital into robust and hardened infrastructure, will ensure our ultimate resiliency.

104-53 - IMPROVEMENTS

104-53.1 - Streets and Sidewalks

The arrangement, character, width, grade and location of all streets and sidewalks within a development shall be considered in relation to existing or planned streets and sidewalks, to topographical conditions, to public convenience and safety, and in appropriate relation to the proposed uses of the land to be served by such streets and sidewalks, and shall be constructed by the developer in accordance with Chapter 105, pertaining to development standards. Streetlights, street signs and traffic regulatory devices shall also be provided in accordance with the standards listed in Chapter 105.

(Ord. No. 10-19, § 4, 12-16-2010; Ord. No. 15-30, § 1, 12-17-2015)

104-53.2 - Water and Sewer

Potable water, reclaimed water, and sanitary sewage systems within a development shall be provided in accordance with the standard specification of the city, and as permitted by the regulatory agencies.

(Ord. No. 10-19, § 4, 12-16-2010; Ord. No. 15-30, § 1, 12-17-2015)

104-53.3 - Storm Drainage

Construction of the stormwater collection systems within a development and all other appurtenances and facilities of storm drainage systems, including required detention/retention provisions, and necessary off-site conveyances which may be required, shall be in accordance with Chapter 78, pertaining to stormwater and floods.

(Ord. No. 10-19, § 4, 12-16-2010; Ord. No. 15-30, § 1, 12-17-2015)

104-53.4 - Utilities to be Located Underground

All utilities within a development, including power and communications lines, must be located underground. For the purpose of this section, surface-mounted transformers, pedestal-mounted terminal boxes and meter cabinets, street lighting or signal control cabinets, and other associated equipment in an underground system may be placed aboveground at a location acceptable to the city. The developer is responsible for complying with the requirements of this section and shall make all the necessary arrangements as required by the serving utilities for the installation of such facilities.

(Ord. No. 10-19, § 4, 12-16-2010; Ord. No. 15-30, § 1, 12-17-2015)

104-53.5 - Fees and Charges

Various fees and charges, such as filing fees, review fees, inspection fees, street lighting payments, street sign and traffic control payments, payments in lieu of recreation land dedication, and such other fees and charges, as may be adopted from time to time, are payable to the city as required.

(Ord. No. 10-19, § 4, 12-16-2010; Ord. No. 15-30, § 1, 12-17-2015)

104-53.6 - Inspections

For all development, all applicable inspection requirements, including, but not necessarily limited to: applicable fees, maintenance guarantee, engineering certification, record drawings, regulatory agency clearances, and bill of sale for personal property located in right-of-way as described in § 104-55 et seq. , will apply.

(Ord. No. 10-19, § 4, 12-16-2010; Ord. No. 15-30, § 1, 12-17-2015)