

Clay Electric Cooperative, Inc.

February 25, 2025

Penny Buys Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 PBuys@PSC.STATE.FL.US

Re: Standards of Construction Report Pursuant to Rule 25-6.0343, F.A.C.

Dear Ms. Buys:

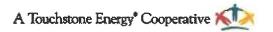
Enclosed is Clay Electric Cooperative, Inc.'s report to the Florida Public Service Commission as required by Rule 25-6.0343 F.A.C. for the calendar year 2024.

Also enclosed is Clay Electric Cooperative, Inc.'s reliability data for the calendar year 2024. This is a voluntary filing Clay agreed to provide using readily available data. As Clay has stated before, we do not have sufficient data to calculate MAIFI, therefore, this index is not furnished.

Should you have any questions about these filings, please do not hesitate to contact me.

Sincerely,

Chris Bryan, P.E. Chief Engineer (352) 473-8000, Ext.8428 <u>cbryan@clayelectric.com</u>



# Clay Electric Cooperative, Inc. Outage Data for 2024

1. Table of Outage Events by Cause

Outage Data 2024	
Cause Code	Count
Defective Equipment	1376
Unknown	1492
Animal	430
Consumer Problem	443
Power Supplier	66
Damaged by Man	194
Vegetation	7752
Bad Primary	79
Bad Secondary	65
Planned Outage	4927
Lightning	634
Vehicle hit pole/padmount	85
CEC Transmission	7
Outage - Other	104
	17654

2. Table of Actual and Adjusted Outage Indices

The tables do not include the MAIFI index because Clay does not collect momentary data on its over 2,700 down line reclosers.

a. Adjusted Outage Indices

Category	2024 Adjusted
SAIDI (Minutes)	175.82
CAIDI (Minutes)	79.87
SAIFI (Events)	2.2
L_Bar (Minutes/Outage)	103.43
CEMI5 (Cust>5 Events)	14191

b. Actual Outage Indices

Category	2024 Actual
SAIDI(Min)	2177.38
CAIDI(Min)	384.34
SAIFI	5.67
L_Bar (Minutes)	444.82
CEMI5 (Cust>5 Events)	103760

Clay Electric Cooperative, Inc. Report to the Florida Public Service Commission Pursuant to Rule 25-6.0343, F.A.C. Calendar Year 2024

## 1. Introduction

Utility:	Clay Electric Cooperative, Inc.
-	Post Office Box 308
	Keystone Heights, Florida 32656

Contact:	Chris Bryan, Chief Engineer
Phone:	(352) 473-8000 ext. 8428
Fax:	(352) 473-1790
Email:	<u>cbryan@clayelectric.com</u>

## 2. Number of meters served:

Approximately 200,265

## 3. Standards of Construction:

## a.) National Electrical Safety Code Compliance

Clay's construction standards, policies, guidelines, practices, and procedures comply with the National Electrical Safety Code (ANSI C-2) [NESC]. Electrical facilities constructed on or after August 1, 2022 will follow the 2023 NESC. Electrical facilities constructed prior to February 1, 2017 are governed by the edition of the NESC in effect at the time of the facility's initial construction.

#### b.) Extreme Wind Loading Standards

Clay's construction standards, policies, guidelines, practices, and procedures for transmission facilities are guided by the extreme wind loading standards specified by Figure 250-2 of the 2023 edition of the NESC. Any transmission lines rebuilt or relocated since adoption of 2017 NESC has also been designed to the extreme wind loading standards.

Clay's construction standards, policies, guidelines, practices, and procedures for distribution facilities are not designed to be guided by the extreme wind loading standards specified by Figure 250-2 except as required by rule 250-C. Clay's experiences in the 2004, 2016, and 2017 hurricanes did not indicate a need to go to the extreme wind loading standards. However, Clay is participating in the Public Utility Research Center's (PURC) granular wind research study through the Florida Electric Cooperative Association (FECA). Clay attended the annual conference held in Gainesville in 2018.

Though Clay intends to continue to self-audit and evaluate our system to determine any immediate needs for system upgrades and hardening in isolated areas, Clay will consider the results of the PURC research before making any final commitments. At this time, Clay does not have sufficient evidence or data to support the cost and effort required to increase our design standards to comply with the extreme wind loading.

c.) Flooding and Storm Surges

Clay is a non-coastal utility; therefore, storm surge is not an issue. Clay does experience minor localized flooding on underground and supporting overhead facilities. Clay continuously evaluates these flood prone areas for possible solutions. Clay is participating through the FECA in the PURC studies on the conversion of overhead electric facilities to underground and the effectiveness of underground facilities in preventing flood damage and outages. Clay will consider the results of this study before making final commitments on system hardening for flooding.

d.) Safe and Efficient Access of New and Replacement Distribution Facilities

Clay's practice since the 1970's has been to construct our underground and overhead facilities in subdivisions along lot lines adjacent to public/private roadways to facilitate safe and efficient access for installation, operation, and maintenance. In other locations, Clay's policies, guidelines, practices, and procedures provide for placement of new and replacement facilities along roadways or areas readily accessible by our crews and vehicles to ensure efficient and safe operation and maintenance.

e.) Attachments by Others:

The pole attachment agreements between Clay and third-party pole attachment companies include language which specifies that the attachment company, not the cooperative, has the burden of assessing pole strength and safety before they attach to the pole. Clay periodically performs follow-up audits of attachments to ensure the attachment is properly installed. In 2022, Clay performed a complete attachment inspection and count. This inspection and count did not assess pole strength and safety, only attachment quantities. As of 12/31/2024, fourteen (14) distinct utilities have over 113,600 attachments on Clay poles.

# 4. Facility Inspections:

#### **Transmission**

a.) Clay currently owns and maintains (1853) transmission structures consisting of (2540) total poles broken down as follows: (1452) wood, (1070) concrete and (18) steel. Wood transmission poles that are deemed as needing to be replaced are evaluated and considered for upgrade to concrete.

Prior to 2007, Clay was on a ten (10) year ground line pole inspection cycle for all wooden transmission poles. The inspection method used involves the sound and bore technique including excavation at the ground line per RUS guidelines. In 2016, Clay reviewed the ground line transmission pole inspection program and decided to continue the ten (10) year inspection cycle in the future. A complete ground line inspection was completed in 2020.

In keeping with the 2007 internal review of its ground visual patrol, climbing inspection and helicopter inspections, Clay initiated a complete climbing inspection of every transmission structure in 2008. This climbing inspection will continue on a four (4) year cycle. Offset from the four (4) year climbing inspection cycle will be a two (2) year ground patrol visual inspection cycle. Should a complete ground patrol scheduled inspection coincide with a complete climbing inspection, the ground patrol inspection will be forgone in favor of the complete climbing inspection. A climbing inspection was performed in 2024.

- b.) Clay performed a ground line transmission pole inspection in 2016. The next scheduled ground line pole inspection is 2026.
- c.) Clay performed a complete climbing inspection in 2024 and the next ground line inspection will be 2026.

During the 2013 review of its ground visual patrol, climbing inspection and helicopter inspections, Clay deemed it necessary to perform helicopter inspections of every structure one time a year. Helicopter inspections are typically performed in June.

- d.) Clay performed one (1) Corona survey helicopter inspection in 2024. The inspection was performed in October. A total of 1,853 structures were inspected consisting of 2,540 poles and thirty- eight (38) substations. The inspection report is attached.
- e.) The 2024 inspections found three (30) poles of the 2,534 total system poles needed replacement of height-class as follows: (3) 50-1, (6) 55-1, (9) 60-1, (2) 65-1, (5) 70-1, (2) 75-1, (1) 80-1, (1) 85-1 and (1) 90-1.
- f.) No new construction and rebuild transmission projects were done in 2024.

2024 Transmission Pole Inspection				
	Summa	ary of Mainten	ance Items by Type	
Transmission Pole Section	Description	Completed Quantity	% of Total Maintenance Items from Inspected Poles	Remediation
Poles		•		
Height	Class			
50		3	0.12%	Changeout
55		6	0.23%	Changeout
60		9	0.35%	Changeout
65		2	0.08%	Changeout
70		5	0.19%	Changeout
75		2	0.08%	Changeout
80		1	0.04%	Changeout
85		1	0.04%	Changeout
90		1	0.04%	Changeout
	Total	30	1.17%	

12 0.47% Repair	Arms	22'/26'/Other	49	1.91%	Replace
			12	0.47%	Repair

Inculators	String	234	9.11%	Replace
Insulators	Susp. Poly	163	6.34%	Replace

Transmission Structures	1853
Total Inspected Poles	2570
Total Transmission Poles	2540
Concrete	1070
Steel	18
Wood	1452
Total	2540

# Distribution

a.) Clay owns and maintains approximately 241,137 distribution poles on its system.

Prior to 2007, Clay was on a ten-year ground line inspection cycle for all wooden distribution poles. The inspection program consists of excavation and sound and bore at the ground line according to RUS guidelines as well as a visual inspection of the of the pole for other maintenance items. This inspection cycle covered all distribution poles regardless of treatment type.

In 2008, Clay revised the inspection cycle to eight (8) years. This revised cycle uses a phased-in approach that resulted in a few years with cycle times of ten (10) years until the transition to the eight (8) year inspection cycle was completed in 2013.

In 2016, Clay evaluated its overall pole inspection and maintenance program and revised it to consist of two separate pole inspection programs. The first inspection program will be the groundline inspection program as described in the first paragraph of section (a) above. The second inspection program, the System Feeder Inspection, is to consist of a total inspection of all distribution poles excluding the groundline. The objective of this inspection is to address a variety of pole related issues such as pole and pole top maintenance, pole loading, NESC code and joint use violations and include service-related issues such as arresters, transformers and other pole mounted equipment.

Each of the two pole inspection programs will be performed on a ten (10) year cycle with the one offsetting the other by five (5) years. The result is all distribution poles being inspected every five (5) years.

The overall program objective is to focus on system improvement and maintenance associated with the distribution feeders scheduled for the particular cycle year with the expectation that this will generate a balanced workload across the system.

- b.) In 2024, the System Feeder Inspection and the Groundline Pole Inspections were performed. The total number of distribution poles inspected in 2024 was 51,889.
- c.) Clay inspected 51,889 distribution poles in 2024. A summary of the rejects and reason for failure is listed below. In addition, a summary of pole maintenance items by type has been included. Note that work completed in 2024 may include carryover work from prior year inspections.

2024 Pole Inspection					
	Total Poles	s Inspected:	51889		
	Summary of R	eject Poles k	oy Cause		
Description	Quantity	% of Total Poles Inspected	Remediation	Completed Quantity	
Clearance	325	0.63%	Replacement	56	
CrossArm	1	0.00%	Replacement	1	
Danger	42	0.08%	Replacement	7	
Ground Rot	373	0.72%	Replacement	95	
Holes High	238	0.46%	Replacement	63	
Hollow Heart	24	0.05%	Replacement	2	

Int Rot	296	0.57%	Replacement	91
Line low	1	0.00%	Replacement	0
Other	1	0.00%	Replacement	1
Split	1926	3.71%	Replacement	499
Split Top	573	1.10%	Replacement	113
Storm Damage	901	1.74%	Replacement	767
StormDamage	1	0.00%	Replacement	0
SysImprove	6372	12.28%	Replacement	1757
Top Decay	8821	17.00%	Replacement	3423
Vehicle	193	0.37%	Replacement	43
Total	20088	38.71%		6918

2024 Pole Inspection					
	Total Poles	s Inspected: 5	1889		
Su	mmary of Mai	ntenance Iten	ns by Type		
Description	Quantity	% of Maint. vs. Total Poles Inspected	Remediation	Completed Quantity	
2Way Feed	5	0.01%	Maint	4	
Animal Guard	388	0.75%	Maint	172	
Arrestor	253	0.49%	Maint	48	
Bear Wrap	1	0.00%	Maint	1	
Bent/Bow	12	0.02%	Maint	10	
Bond Wire	1	0.00%	Maint	2	
Bonding	885	1.71%	Maint	191	
Bonding Repair	44	0.08%	Maint	13	
Bonding Replace	24	0.05%	Maint	9	
Bonding-Loose	0	0.00%	Maint	0	
Bonding-Static	0	0.00%	Maint	4	
Brace	44	0.08%	Maint	18	
Broken Guy	14	0.03%	Maint	12	
Clearance	10	0.02%	Maint	1	
CrossArm	86	0.17%	Maint	47	
Damage tx	0	0.00%	Maint	2	
Frayed Neut	0	0.00%	Maint	0	
Frayed Prim	0	0.00%	Maint	1	
Guy Guard	0	0.00%	Maint	0	
Guy/Anchor	1	0.00%	Maint	1	
Holes/High	468	0.90%	Maint	236	
Insulator	51	0.10%	Maint	16	
Leaking Tx	0	0.00%	Maint	0	
Leaning	317	0.61%	Maint	321	
Line Down	10	0.02%	Maint	7	
Line Low	66	0.13%	Maint	143	
Loose Guy	212	0.41%	Maint	148	

Loose Hrd	26	0.05%	Maint	34
No G On Pole	142	0.27%	Maint	64
Notified Customer	0	0.00%	Maint	0
Notified Utility	1	0.00%	Maint	0
Other	21	0.04%	Maint	8
Paint	1	0.00%	Maint	1
Pole Loading	0	0.00%	Maint	0
Pull Stub	4	0.01%	Maint	1
R/W	240	0.46%	Maint	173
ReSag Pri	2	0.00%	Maint	1
ReSagServ	15	0.03%	Maint	2
Rusted Tx	15	0.03%	Maint	29
S/L Day Burner	13	0.03%	Maint	4
S/L Globe	37	0.07%	Maint	6
S/L Ground	0	0.00%	Maint	0
Service Covers	0	0.00%	Maint	0
Splintable	0	0.00%	Maint	0
Split Top	9186	17.70%	Maint	3778
Srvc Hrd	1	0.00%	Maint	0
Srvc Loop	0	0.00%	Maint	0
St Light	1	0.00%	Maint	25
Stub Pole	106	0.20%	Maint	131
Tank Rust	47	0.09%	Maint	15
Top Decay	1531	2.95%	Maint	599
u-Guard	0	0.00%	Maint	4
UnAuth Attach	37	0.07%	Maint	12
VisualOk	31	0.06%	Maint	18
Totals:	14349	27.65%		6312

d.) On the attached email the complete inspection report for each rejection and maintenance items is included. All rejections are expected to be replaced within a year of the inspection date; however, this can be impacted by field conditions, material/labor availability and volume of work. All maintenance items are expected to be addressed within a year of the inspection date; however, this can be impacted by field conditions, material/labor availability and volume of work. Summary groupings by height and class are as follows:

2024 Pole Inspection						
	Total Poles Inspected: 44802					
Summary of Reject Poles by Height and Class						
Height	Class	Quantity	% of Quantity vs. Total Poles Inspected	Remediation	Completed Quantity	
0	0	2	0.00%	Replacement	2	
0	5	1	0.00%	Replacement	0	
0	6	3	0.01%	Replacement	1	
20	0	3	0.01%	Replacement	0	
24	7	3	0.01%	Replacement	0	
25	0	4	0.01%	Replacement	1	
25	6	1	0.00%	Replacement	0	
25	7	4	0.01%	Replacement	0	
30	3	1	0.00%	Replacement	0	
30	4	2	0.00%	Replacement	0	
30	5	12	0.03%	Replacement	2	
30	6	1809	4.04%	Replacement	552	
30	7	3	0.01%	Replacement	0	
35	0	4	0.01%	Replacement	0	
35	1	31	0.07%	Replacement	9	
35	2	55	0.12%	Replacement	11	
35	3	231	0.52%	Replacement	57	
35	4	1836	4.10%	Replacement	471	
35	5	3134	7.00%	Replacement	697	
35	6	6316	14.10%	Replacement	1733	
35	7	29	0.06%	Replacement	3	
40	0	2	0.00%	Replacement	0	
40	1	1	0.00%	Replacement	1	
40	2	14	0.03%	Replacement	4	
40	3	4	0.01%	Replacement	0	
40	4	710	1.58%	Replacement	249	
40	5	4142	9.25%	Replacement	2466	
40	6	668	1.49%	Replacement	81	
45	0	4	0.01%	Replacement	1	
45	2	33	0.07%	Replacement	8	
45	3	12	0.03%	Replacement	0	
45	4	642	1.43%	Replacement	368	
45	5	13	0.03%	Replacement	9	
45	6	33	0.07%	Replacement	30	
50	1	18	0.04%	Replacement	5	
50	2	2	0.00%	Replacement	1	
50	3	272	0.61%	Replacement	139	
50	4	4	0.01%	Replacement	1	
50	5	1	0.00%	Replacement	0	

50	6	8	0.02%	Replacement	8
55	1	12	0.03%	Replacement	8
55	2	0	0.00%	Replacement	0
55	3	5	0.01%	Replacement	0
60	1	1	0.00%	Replacement	0
60	2	1	0.00%	Replacement	0
60	3	0	0.00%	Replacement	0
65	1	0	0.00%	Replacement	0
65	2	2	0.00%	Replacement	0
65	H4	0	0.00%	Replacement	0
100	1	0	0.00%	Replacement	0
Total		20088	44.84%		6918

	2024 Pole Inspection					
	Total Poles Inspected: 44802					
Summary of Poles by Height and Class with Maintenance Items						
Height	Class	Quantity	% of Quantity vs. Total Poles Inspected	Remediation	Completed Quantity	
20	6	0	0.00%	Maintenance	6	
24	6	1	0.00%	Maintenance	1	
24	7	2	0.00%	Maintenance	1	
25	6	0	0.00%	Maintenance	10	
25	7	10	0.02%	Maintenance	10	
30	1	1	0.00%	Maintenance	0	
30	2	0	0.00%	Maintenance	0	
30	3	0	0.00%	Maintenance	0	
30	4	2	0.00%	Maintenance	0	
30	5	19	0.04%	Maintenance	5	
30	6	4125	9.21%	Maintenance	1606	
30	7	26	0.06%	Maintenance	4	
35	1	1	0.00%	Maintenance	0	
35	2	1	0.00%	Maintenance	0	
35	3	3	0.01%	Maintenance	0	
35	4	425	0.95%	Maintenance	87	
35	5	109	0.24%	Maintenance	21	
35	6	6445	14.39%	Maintenance	1573	
35	7	16	0.04%	Maintenance	4	
40	2	29	0.06%	Maintenance	10	
40	3	23	0.05%	Maintenance	5	
40	4	2665	5.95%	Maintenance	751	
40	5	6489	14.48%	Maintenance	1817	
40	6	2606	5.82%	Maintenance	898	

Total		24796	55.35%		7444
110	1	0	0.00%	Maintenance	0
100	2	0	0.00%	Maintenance	0
100	1	1	0.00%	Maintenance	3
90	3	0	0.00%	Maintenance	1
80	2	1	0.00%	Maintenance	0
80	1	0	0.00%	Maintenance	1
75	1	0	0.00%	Maintenance	1
65	6	3	0.01%	Maintenance	1
65	1	17	0.04%	Maintenance	3
60	6	0	0.00%	Maintenance	1
60	4	2	0.00%	Maintenance	0
60	3	1	0.00%	Maintenance	0
60	2	3	0.01%	Maintenance	2
60	1	10	0.02%	Maintenance	4
55	6	2	0.00%	Maintenance	2
55	5	10	0.02%	Maintenance	0
55	4	0	0.00%	Maintenance	0
55	3	21	0.05%	Maintenance	5
55	2	16	0.04%	Maintenance	1
55	1	16	0.04%	Maintenance	1
50	6	7	0.02%	Maintenance	0
50	5	5	0.01%	Maintenance	0
50	4	27	0.06%	Maintenance	10
50	3	361	0.81%	Maintenance	77
50	2	7	0.02%	Maintenance	5
50	1	39	0.09%	Maintenance	13
45	6	23	0.05%	Maintenance	3
45	5	27	0.06%	Maintenance	4
45	4	1081	2.41%	Maintenance	475
45	3	36	0.08%	Maintenance	3
45	2	81	0.18%	Maintenance	19
40 45	7	1 0	0.00%	Maintenance Maintenance	0

# 5. Vegetation Management

### **Transmission**

a.) Clay's vegetation management program for the transmission rights-of-way covers approximately 221 miles of transmission line and consists of mowing, herbicide spraying, and systematic recutting. Clay performs all three methods on its entire transmission system. While Clay is doing systematic recutting on our transmission corridor, they attempt to remove any danger trees off right-of- way.

Clay's vegetation program has been very effective in keeping Clay's transmission system safe and reliable. During the hurricanes of 2004, 2016 and 2017, Clay sustained no damage to its transmission system from vegetation.

Clay's systematic program for mowing and spraying is on a 3-year cycle while Clay's systematic recutting program is on a 3-, 4-, or 5-year cycle as needed.

b.) In 2024, Clay met or exceeded its scheduled mowing and spraying on the transmission system. Clay exceeded its goal by mowing 58.66 of 55.43 miles of transmission right-of-way in 2024. Clay met its goal by spraying 65.17 of the 55.43 miles of transmission right of way in 2024. In 2024, Clay recut 46.74 miles or 103% of transmission right-of-way. Attached are files of Clay's mowing, spraying, and recutting program for 2024.

One hundred forty-three (143) vegetation management discrepancies, ninetyeight (98) dead or danger trees, two (2) maintenance trims were found and corrected, and forty-three (43) vines were treated during two (2) annual vegetation management ground inspections in 2024.

# **Distribution**

a.) Clay owns and operates over 9,322 miles of overhead primary distribution lines. All of our primary lines are under our vegetation management program.

Clay's vegetation management program has been developed considering the widely different service areas Clay serves. Presently, Clay's vegetation management program consists of a three-year cycle (city), a four- year cycle (urban) and a five-year cycle (rural) for all its distribution primary circuits. The average time for the three cycles is 4.59 years. The reason for the difference in cycle times is simply the difference between re-growth speed and trimming clearance. In the city areas Clay often cannot get the full 10' - 15' clearance Clay desires, plus these areas often have more water and fertilizers due to residential sprinkling and fertilizing. At the other extreme in rural areas, Clay can often get the full 10' - 15' clearance since much of the trees in these areas get only rain and not fertilizer. Every distribution primary feeder Clay has is assigned to one of these cycles and a schedule is developed to ensure completion of the cycle. On the attached email is the complete right-of-way systematic recut plan. Annually after a feeder is recut, Clay's arborist evaluates the clearance obtained and the expected re- growth speed to establish the cycle for the next recut. The

next recut could be 3, 4, or 5 years. Therefore, each year Clay's arborist evaluates a feeder's cycle and adjusts the cycle as needed to ensure safe and reliable operation of Clay's feeders.

In 2023 Clay made the decision that all new overhead primary distribution easements would be 15' on either side of the centerline.

Clay's Vegetation Management Program is a clear-cut right-of-way maintenance program combined with mowing and spraying to provide a safe and reliable distribution system. Clay has approximately 1% of its feeder miles under a three-year cycle, 33% under a four-year cycle, and the remaining 66% is under a five-year cycle.

Clay has a Pre-Cycle Vegetation Maintenance Program consisting of annual inspections of all the distribution feeders for areas that may have the potential to cause an outage before the next cycle year. If Clay finds areas that need to be trimmed to carry the feeder to the next year, these areas will be trimmed on the Pre-Cycle Maintenance Program.

Clay's Dead/Danger Tree Removal Program is with annual inspections of the Pre-Cycle Maintenance Program. Clay also receives requests from members throughout the year for removal of dangerous trees. All of these are field inspected by Clay and action taken as required.

Before Clay begins recutting a feeder, Clay places a bill insert announcing the beginning of recutting in those accounts affected. A copy of the insert is attached.

Clay has a vegetation management webpage on its' website at <u>www.clayelectric.com</u> that explains Clay's Vegetation management Program in detail for consumers.

Clay also has several publications it produces to educate the public on Clay's right-of-way clearing program. These consist of a Tree Maintenance Notification door hanger as well as a brochure titled "Keeping the Lines Clear". These are given to members whenever a member asks or when Clay needs to cut danger trees or vegetation that is not on an easement of Clay's. Both publications are available on the vegetation management web page. A copy of each is attached.

Clay also produces a guide titled "Landscape Planning" which describes ways to landscape within or near the right-of-way that would be compatible with the right-of-way but yet still provide a safe and beautiful landscape. A copy of the guide is attached.

Clay also has a systematic vegetation mowing and herbicide spraying program of three-year cycles each.

Clay's Vegetation Management Program addresses all areas of vegetation from landscape planting to danger tree removal. Clay has been following this program diligently for many years now. While tree limbs are still one of Clay's largest outage causes, Clay is confident its vegetation management program is an effective way to provide for a safe and reliable distribution system. Clay strongly feels the 3-, 4-, or 5-year cycle they have developed and follow is a realistic program to implement. Reducing the cycle times in Clay's opinion without regard to clearance and re-growth would not result in a significantly safer or reliable distribution system.

b.) In 2024, Clay met its goal by mowing 2338.65 miles of its distribution circuits. Clay's vegetation spraying program covered 2332.83 miles of its distribution circuits which met Clay's goal. Clay's systematic vegetation recut program met its goal of covering 1808.0 miles of its distribution circuits. Clay Electric met its pre-cycle maintenance goals for 2024. Clay's systematic vegetation recut, mowing, and spraying programs for 2024 are recorded in detail on the attached files.

# 6. Storm Hardening Research

"Report on Collaborative Research for Hurricane Hardening" now provided to Florida's Public Service Commission (FPSC) by University of Florida's Public Utility Research Center (PURC).

<sup>&</sup>quot;Y:\PSC Filings\2024\Report to Florida PSC for 2024.docx"