

January 30, 2018

To: Florida PSC

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The following comments and observations are provided in response to PSC Docket # 20170215

These comments are predicated on noting that hurricane Irma's scale including the Keys, the West Coast, and the East Coast spread the Utility's emergency response resources very thin.

- The City contacted FP&L starting on 9/10 to coordinate the City's Hurricane Preparedness and Response Plan.
- There was very little communication from FP&L during the first push and early response efforts.
- The first email communication from FP&L acknowledging the list of power related issues was on 9/20.
- This gap in communication is the main criticism for FP&L's response.
- Internally, City staff developed a GIS based map of the issues related to power.
- City crews saw and communicated with FP&L Contractors actively working to ground wires and identify power issues.
- If a liaison from FP&L had been communicating with the City from before the storm, contacts and priorities would have been delineated more rapidly.
 - One example being City crews working to clear debris needed confirmation that wires and lights downed were grounded. Without confirmation from FP&L some items had been grounded but the wires were left and there was no agreed on tag-out procedure. Since there was not a clear line of communication there was no way to determine if the area was clear and safe.
- Below is a list of recommendations for improvement:

1. FP&L at a minimum make contact with the designated City representative 48 hours before the storm to share points of contact, action plans, and reporting procedures.
2. Distribution and Street Light GPS Program – Upon contacting the FP&L representative, it was determined that FP&L was unaware of location and status of infrastructure. This lead to delays in repair and required City staff to drive the City and provide FP&L GPS coordinates with multiple status reports to clear issues.
3. FP&L provides a liaison to be stationed at the City or train a City staff member to coordinate with FP&L emergency response team
4. City staff is looking into purchasing voltage proximity detectors for City crews working on the first push
5. An interactive map/web based trouble reporting system that provides status updates and tracking capabilities would be helpful

Overall, given the magnitude of the storm and the number of outages, FP&L performed fairly well. The principal recommendation is to GPS tag FP&L's distribution infrastructure similar to what they are doing for street lighting, linking both to a WO system for a more rapid response to issues. This would also provide QA/QC that issues have been closed.