

Lakeland Electric response to DN 20190000-OT - Ten-Year Site Plans Supplemental Data Request #2 received by Lakeland on 7/2/2019 from Patti Zellner.

1. With respect to the forecasting methodology, procedure, and accuracy associated with Lakeland Electric's forecast of "Total Sales to Ultimate Customers," please specify all the differences/ modifications/ improvements, if any, between Lakeland Electric's 2018 TYSP and 2019 TYSP.

There are no differences in forecasting methodology between Lakeland Electric's 2018 TYSP and 2019 TYSP

2. Please explain the Utility's planning process for flood mitigation for current and proposed power plant sites and transmission/distribution substations.

Planning an effective strategy for flood mitigation during and after the flood event is very critical in electric utility business as utility systems and equipment within the facility (both power plants and sub-stations) needs to be protected from damage. Lakeland Electric has successfully planned and adopted the Flood prevention plan in the past to protect critical electrical (e.g. primary utility power, communications equipment's, and information technology equipment's) and mechanical systems to prevent electric outage and to ensure employee's safety during the operation of its facilities in its territory during the flood event.

The Lakeland Electric territory is not a coastal area and, therefore, not to subject to storm surges or other wide-spread significant flooding. In locating the proposed power plants and sub-stations sites, landscape areas that are subject to high flooding are thoroughly investigated. Standard construction guidelines are adopted in designing the plant and sub-station facilities after detailed land permitting process as per federal, state, and local requirements. For example, the poles in power plants and sub-stations which are 60 feet and higher are constructed as per NESC Rule 250C. All structures below this height are designed and built to meet or exceed the requirements of Grade B construction. Also, the construction of power plants and sub-stations will be conducted after detailed review and resolving wet-land constraints under the flood mitigation plan and placement of such facilities are ensured to facilitate safe and efficient access during the flood event. Those facilities are designed and constructed according to FEMA 543¹ guidelines to meet Category IV hurricane specifications.

Lakeland Electric adopts an Emergency Operation Plan (EOP) in all its power plant sites for storm measure at different phases – starting from Storm Readiness to post Mortem. The purpose of this Emergency Operations Plan (EOP) is to ensure preparedness of Lakeland Electric's Energy Production Department in the severe weather event -tropical storm or hurricane. Storm preparedness is every Lakeland Electric employee's responsibility. Preparation provides the following benefits:

- Provides safety and protection of our employees, the community and the environment;
- Maintains compliance with regulatory requirements of the Federal, State, and local agencies;
- Enhances the ability of Lakeland Electric to recover from financial losses, regulatory fines, loss of market share, damages to equipment or business interruption;
- Reduces exposure to civil or criminal liability in the event of a storm;
- Enhances our image and credibility with employees, customers, suppliers, and the community;
- Possible reduction of insurance premiums.

This EOP is also integrated into the Emergency Response Action Plan (ERAP), Lakeland Electric's

¹ Design Guide for Improving Critical Facility Safety from Flooding and High Winds, FEMA. This guide incorporates hazard mitigation measures to reduce the vulnerability to damages critical facilities during the flood event.

companywide plan and coordinated with the City of Lakeland's Risk Management Department. An employees' dedicated hotline telephone system is set up for all the employees to use during the emergency operations.

STORM PHASES

Storm preparedness for the Energy Production EOP is divided into six (6) phases. Phase I will be conducted no later than June 1st of each year and will remain effective until the end of November. The remaining phases will be made effective directed by the General Manager or Director of Energy Production.

. A summary of different phases of the storm event are as follows:

1.1.1. PHASE I - STORM READINESS

A checklist shall be completed annually before the start of storm season. All personnel shall be briefed and trained from this manual from the department head.

1.1.2. PHASE II- STORM WATCH

A hurricane, tropical storm or other severe weather that is identified inside a 300-mile perimeter zone of Lakeland, or in the judgment of Energy Production management, the storm poses a potential threat to the plants. It is likely that the plants would go into Phase II before the rest of the department because of the time needed to prepare for a serious storm.

1.1.3. PHASE III -STORM WARNING

The storm is expected to impact the Lakeland area.

1.1.4.. PHASE IV - STORM

The storm is currently impacting the Lakeland area.

1.1.5. PHASE V - POST STORM or NO STORM

The storm center has cleared the Lakeland area. Restoration work begins, and a reversal of phases. If the storm changed direction or dissipated and did not impact the Lakeland area and Phase IV was not placed into effect, we will have a reversal of phases. Management will undo those preparations made in Phases II and III and return to normal safe operations.

1.1.6. PHASE VI - POSTMORTEM

Restoration continues. It is imperative that accurate records are kept of all activities during the storm phases.