



**CITY OF
MOUNT
DORA**

PUBLIC WORKS AND UTILITIES

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Mount Dora, FL 32757

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Fax: 352-735-4801

Finance Department
352-735-7118
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Human Resources
352-735-7106
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Planning and Development
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City Hall Annex
900 N. Donnelly St.
Mount Dora, FL 32757

Parks and Recreation
352-735-7183
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Public Safety Complex
1300 N. Donnelly St.
Mount Dora, FL 32757

Police Department
352-735-7130
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Fire Department
352-735-7140
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Public Works Complex
1250 N. Highland St.
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W. T. Bland Public Library
1995 N. Donnelly St.
Mount Dora, FL 32757
352-735-7180
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Website:
www.cityofmountdora.com

VIA EMAIL (pbuys@psc.state.fl.us)

February 25, 2019

Penelope Buys
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
Email: pbuys@psc.state.fl.us

RE: City of Mount Dora Storm Hardening Report for Rule 25-6.0343 F.A.C

Dear Ms. Buys:

Attached to this letter is the City of Mount Dora Storm Hardening Report pursuant to Rule 25-6.0343 F.A.C. for Calendar Year 2018. The City is submitting this report to you via email and will not be sending a hard copy to the FPSC via U.S. mail unless you request it.

Please verify receipt of this report by an email response to me at my email address shown below.

If you have any questions, feel free to contact me.

Very truly yours,

Charles F. Revell
Electric Utility Director

Phone: (352) 735-7155, x1802
Email: revellc@cityofmountdora.com

City of Mount Dora
**Storm Hardening Report to the Florida Public Service
Commission Pursuant to Rule 25-6.0343, F.A.C.
Calendar Year 2018**

1) Introduction

a) Name of city/utility

City of Mount Dora

b) Address, street, city, zip

900 North Donnelly Street
Mount Dora, FL 32757

c) Contact information: Name, title, phone, fax, email

Mr. Charles F. Revell
Electric Utility Director
Phone: (352) 735-7155, ex 1802
Fax: (352) 735-1539
Email: revellc@cityofmountdora.com

2) Number of customers served in calendar year 2018

Approximately 5,824 Customers

3) Standards of Construction

a) National Electric Safety Code Compliance

The City of Mount Dora (City) retained an engineering firm which made a field review of the City's electric distribution system to determine the extent that its construction standards, policies, guidelines, practices, and procedures comply with the various editions of the National Electrical Safety Code (NESC) that were in effect during the construction of the City's distribution system.

The engineering analysis investigated the maximum allowable span distances between poles and the ultimate loading on guy wires, anchors, and poles. The report made recommendations for major planned work and targeted critical infrastructure covering the following construction standards:

1. Specification of anchors and guy wire strength
2. Guying standards to attach guy wires to all level of construction on poles including secondary and communication cable pole attachments
3. Specification of wood and concrete poles for various span distances

The City is using the engineering study to evaluate its existing distribution system to identify facilities where the new construction standards should be implemented.

The engineering firm also developed construction standards drawings for its 12 kV distribution poles. The standards focused primarily on three-phase poles, since these form the backbone of the City's distribution system. The construction standards drawings will be very valuable during storm events when other utilities are called to assist the City in rebuilding its main distribution feeders.

The City has replaced many older overhead distribution facilities during the last ten years using new concrete poles, new insulators, and other new equipment. The City believes that its existing distribution system can withstand damage caused by extreme weather, based upon its experiences during the hurricanes of 2004 and Tropical Storm Fay in 2008. Hurricane Irma caused some damage to the distribution system, but the City was able to complete the major repairs in approximately six days.

For new construction, the City uses concrete poles almost exclusively for its main distribution feeders. All new construction conforms to the new construction standards identified by the engineering firm.

The City's five year Capital Improvement Program includes a Wood Pole Replacement Program that hardens the distribution system by replacing older wood poles for the City's main distribution feeders with concrete or fiberglass poles. The City has also made annual field inspections of its overhead distribution facilities since 2008.

Subject to future budget constraints, the City intends to make further engineering evaluations of its electric distribution system to insure compliance with the NESC.

b) Extreme Wind Loading Standards

Per Figure 250-2(d) of the 2012 edition of the NESC, the extreme wind loading standard for the City is approximately 102 MPH, using linear interpolation between wind contours as permitted by the NESC. The City's central Florida location is very close to the 100 MPH wind contour line.

The City retained an engineering firm to insure that its construction standards, policies, guidelines, practices, and procedures meet the Extreme Wind Loading Standard for 1) new construction; 2) major planned work, including expansion, rebuild, or relocation of existing facilities, assigned on or after December 10, 2006; and 3) targeted critical infrastructure facilities and major thoroughfares. The City is using the engineering study to evaluate its existing distribution system to identify facilities where the new construction standards should be implemented to comply with the Extreme Wind Loading Standards.

The construction standards drawings for distribution poles that the City has developed reflect the extreme wind loading standard. All new construction conforms to the new construction standards identified by the engineering firm.

The City requires that all new or upgraded customer electrical services be installed underground. In addition, the City installs underground distribution systems for all new subdivisions or similar large projects. These underground systems are less subject to damages from extreme winds.

The City's five year Capital Improvement Program includes a Wood Pole Replacement Program that hardens the distribution system by replacing older wood poles with concrete or fiberglass poles for the City's main distribution feeders. The new concrete poles are inherently stronger and capable of higher wind loading.

The City is also participating in the Public Utility Research Center's (PURC) granular wind research study through the Florida Municipal Electric Association. The City will continue to self-audit and evaluate its distribution system to determine any immediate needs for system upgrades and hardening in specific areas. In addition, the City will monitor the results of this research to determine the most appropriate response for system upgrades and hardening.

Subject to future budget constraints, the City intends to make further engineering evaluations of its electric distribution system to insure compliance with the Extreme Wind Loading Standards of the NESC.

c) Flooding and Storm Surges

Electrical construction standards, policies, guidelines, practices, and procedures at the City address the effects of flooding on underground distribution facilities and supporting overhead facilities. Because of the hilly terrain around Mount Dora, flooding of low-lying areas is not generally a problem.

The City is not subject to storm surges because of its inland location.

Through the Florida Municipal Electric Association, the City is participating in the Public Utility Research Center's (PURC) study on the conversion of overhead electric facilities to underground and the effectiveness of undergrounding facilities in preventing storm damage and outages. The City will continue to evaluate and address the effects of flooding but will wait for the results of this research to justify the effort and cost of converting overhead distribution facilities to underground.

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

Electrical construction standards, policies, guidelines, practices, and procedures at the City provide for placement of new and replacement distribution facilities so as to facilitate safe and efficient access for installation and maintenance. Wherever new facilities are placed, all facilities are installed so that City crews have adequate access to perform maintenance/repairs expeditiously and safely. Most distribution facilities are on public streets which are easily accessible. The City no longer allows back-lot line utility services for new developments. The City requires that all new distribution facilities be near a street or within a utility easement.

e) Attachments by Others

As mentioned earlier, the City retained an engineering firm to make an initial analysis of safety, pole reliability, pole loading capacity, or engineering standards for attachments by others to the City's distribution poles. A new construction standard was developed to use guy wires for all levels on poles, including communication cable pole attachments.

The construction standards drawings for distribution poles that the City developed reflect the impact of pole attachments on pole loading capacity.

In addition, knowledgeable field personnel conduct an annual inspection of all of the City's electric facilities to identify obviously overloaded poles. The City has not experienced any failures of poles due to overloading by pole attachments of other entities.

Finally, the City is continuing discussions to update its Pole Attachment and Joint Use agreements with the local telephone, cable, and fiber companies. The new agreements will specifically address pole attachment loadings, adding new attachments, removing attachments, and implementing a formal work order and notification process.

4) Facility Inspections

a) Describe the utility's policies, guidelines, practices, and procedures for inspecting transmission and distribution lines, poles, and structures including, but not limited to, pole inspection cycles and pole selection process.

The City electric system consists of distribution lines, poles, and structures – it owns no transmission facilities. Since its service territory is relatively small, the Electric Department has been able to make visual inspections of its six distribution feeders on an annual basis. Wood poles are visually inspected for cracks and a sounding technique is used to determine potential wood rot. On December 5, 2017, the City engaged a contractor to inspect and treat all wood poles in the electric service territory. This project was completed in 2018 and the City used the inspection results to establish a replacement priority.

The City also makes comprehensive field inspections of its distribution lines, poles, and structures. The program consists of an annual field inspection of all six of the City's six distribution feeders, documented with a field report that identifies the following situations:

1. Tree clearance
2. Moss/vines
3. Low-hanging wires or services
4. Loose or missing guy wire
5. Damaged or missing guy guards
6. Rotten or damaged pole
7. Missing or damaged animal guards
8. Broken pins, insulators, or grounds
9. Blown lightning arrestors
10. Damaged switch or jumpers
11. Damaged capacitor bank
12. Damaged pole attachment

Once the field inspection reports have been completed, City staff goes back to each pole and makes the identified repairs. The City typically schedules the annual field inspections during early summer so that the majority of repairs can be completed before the beginning of hurricane season. If a third-party pole attachment appears damaged or does not meet NESC clearance requirements, the City notifies the respective party in writing.

To supplement the annual field inspections, the City makes additional inspections before the arrival of adverse weather events, such as hurricanes and tropical storms. The pre-storm inspections utilize the same inspection form as the annual field inspection.

Some of the City's distribution lines are attached to 69 kV transmission poles owned by Duke Energy. Any observed problems with the transmission poles are reported directly to Duke Energy.

The City utilizes a GIS mapping system for its electric distribution system. The GIS system is now being used to map and manage all of the City's distribution facilities including wood and concrete poles, attached hardware, pole attachments by other entities, and underground electrical facilities.

- b) Describe the number and percentage of transmission and distribution inspections planned and completed for 2018.

The City completed its annual field inspections of its distribution system during the summer of 2018, making inspections of all six feeder circuits. The City completed 100% of its planned inspections.

The City owns no transmission facilities so no inspections were made.

- c) Describe the number and percentage of transmission poles and structures and distribution poles failing inspection in 2018 and the reason for the failure.

The City completed its comprehensive field inspections of all six distribution feeders during the summer of 2018.

The table below summarizes the numbers, percentages, and reasons that distribution poles failed the 2018 field inspections:

Circuit	Tree Trimming Needed	Remove Mess/Vine	Low-hanging Wires	Loose Missing Guy	Damaged/Missing Guy Guard	Rotten/Damaged Pole	Missing/Damaged Pole	Broken Pipe/Insulator/Squirrel Guard	Blown Lightning Arrestor	Damaged Switch Jumpers	Damaged Capacitor Bank	Circuit Totals
M593	5	5	-	-	-	-	6	-	-	-	-	16
Percent of Total	31.3%	31.3%	0.0%	0.0%	0.0%	0.0%	37.5%	0.0%	0.0%	0.0%	0.0%	100.0%
M594	3	-	1	2	5	2	5	-	1	-	-	24
Percent of Total	12.5%	0.0%	4.2%	8.3%	20.8%	8.3%	20.8%	0.0%	4.2%	0.0%	0.0%	100.0%
M595	2	3	-	-	-	-	-	-	1	-	-	6
Percent of Total	33.3%	50.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	16.7%	0.0%	0.0%	100.0%
M596	1	6	-	-	-	-	3	1	2	-	-	13
Percent of Total	7.7%	46.2%	0.0%	0.0%	0.0%	0.0%	23.1%	7.7%	15.4%	0.0%	0.0%	100.0%
M597	5	4	-	-	1	-	2	-	1	-	-	13
Percent of Total	38.5%	30.8%	0.0%	0.0%	7.7%	0.0%	15.4%	0.0%	7.7%	0.0%	0.0%	100.0%
M598	3	6	-	-	-	-	2	-	-	-	-	11
Percent of Total	27.3%	54.5%	0.0%	0.0%	0.0%	0.0%	18.2%	0.0%	0.0%	0.0%	0.0%	100.0%
All Circuits	19	24	1	2	6	2	18	1	5	-	-	83
Percent of Total	22.9%	28.9%	1.2%	2.4%	7.2%	2.4%	21.7%	1.2%	6.0%	0.0%	0.0%	100.0%

The City owns no transmission facilities.

- d) Describe the number and percentage of transmission poles and structures and distribution poles, by pole type and class of structure, replaced or for which remediation was taken after inspection in 2018, including a description of the remediation taken.

The City remediated all of the issues identified in the annual field inspection shown above and has replaced or is replacing the identified rotten or damaged wood poles. Based on the inspections conducted in 2018 for the Wood Pole Replacement program, the City replaced 32 wood poles with concrete poles.

The City attaches its distribution circuits to certain Duke Energy 69 kV transmission poles that are within the City's electric service area. Of the 90 transmission poles, 34 are wood. Duke Energy has an on-going program of replacing its older wood poles with steel poles. While these transmission poles are not owned by the City, the pole replacement program improves the ability of the City's distribution system to better withstand storm events since its distribution circuits attach to the poles. Moreover, hardening the two Duke Energy 69 kV transmission circuits that feed the Mount Dora Substation improves overall reliability.

The following table lists all wood poles that were replaced with concrete, fiberglass, or steel poles in 2018:

Description	Number of Poles at 1/1/18				Wood Pole Replacements	Added Poles	Removed Poles	Number of Poles at 12/31/18	
	Original Count	Inventory Adjustment ⁽¹⁾	Revised Count	% of Total Poles	Count	Count	Count	Count	% of Total Poles
Wood Poles									
25 foot	153	0	153	5.3%	(9)		(1)	143	4.9%
30 foot	652	0	652	22.6%	(15)			637	22.0%
35 foot	38	0	38	1.3%				38	1.3%
40 foot	441	0	441	15.3%	(4)			437	15.1%
45 foot	457	0	457	15.8%	(4)			453	15.7%
50/55 foot	0	0	0	0.0%				0	0.0%
Duke Energy Transmission ⁽²⁾	34	0	34	1.2%				34	1.2%
Total Wood Poles	1,775	0	1,775	61.5%	(32)	0	(1)	1,742	60.3%
Concrete/Fiberglass/Steel Poles									
30 foot	444	0	444	39.9%	24	2	(1)	469	40.9%
35 foot	0	0	0	0.0%				0	0.0%
40 foot	225	0	225	20.2%	4			229	20.0%
45 foot	382	0	382	34.3%	4	1		387	33.7%
50/55 foot	6	0	6	0.5%				6	0.5%
Duke Energy Transmission ⁽²⁾	56	0	56	5.0%				56	4.9%
Total Concrete/Fiber/Steel	1,113	0	1,113	38.5%	32	3	(1)	1,147	39.7%
Total Poles:	2,888	0	2,888	100.0%	0	3	(2)	2,889	100.0%

(1) The number of poles in the table were adjusted to reflect field inventory updates for the GIS mapping system.
 (2) Duke Energy Transmission Poles within the City's electric service area.

The City owns no transmission facilities.

5) Vegetation Management

- a) Describe the utility's policies, guidelines, practices, and procedures for vegetation management, including programs addressing appropriate planting, landscaping, and problem tree removal practices for vegetation management outside of road right-of-ways or easements, and an explanation as to why the utility believes its vegetation management practices are sufficient.

The City's Electric Division trims trees on a 12 month cycle using an outside contractor with a two-man crew working 40 hours per week. This contractor focuses on clearing vegetation that could adversely impact the reliability of the City's electric distribution system and to insure compliance with the NESC. In addition to the contractor crew, the City employs one two-man crew that is continuously trimming trees and reducing vegetative growth throughout other parts of the City. In some situations, the City crew assists the contractor crew in trimming or removing large trees.

The City routinely removes limbs from trees located outside road right-of-ways or easements that could create clearance problems for its overhead distribution circuits. The City has also removed entire trees in such locations if those trees threaten overhead distribution circuits (usually dead trees in danger of falling).

The City believes that its vegetation management practices result in high reliability because it trims trees on a 12 month cycle, which is much more frequent than the practices of other Florida electric utilities.

- b) Describe the quantity, level, and scope of vegetation management planned and completed for transmission and distribution facilities in 2018.

The City Electric Division trimmed trees on a 12 month cycle using an outside contractor with a two-man crew working 40 hours per week. The City also removed limbs from trees located outside road right-of-ways or easements that could create clearance problems for its overhead distribution circuits.

The City owns no transmission facilities.

6. Storm Hardening Research

The City is a member of the Florida Municipal Electric Association (FMEA), which is participating with all of Florida's electric utilities in storm hardening research through the Public Utility Research Center at the University of Florida. Under separate cover, FMEA is providing the FPSC with a report of research activities. For further information, contact Amy Zubaly, Executive Director, FMEA, 850-224-3314, ext. 1, or azubaly@publicpower.com.