February 23, 2024

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Attn: Adam Teitzman

Re: Storm Hardening Report

Dear Mr. Teitzman,

Pursuant to Rule 25-6.0343, Florida Administrative Code, attached is the Storm Hardening Report for 2023 for Lakeland Electric via the Commission's electronic platform.

If you have questions, please contact me at 863-834-6595.

Sincerely,

Cynthia Clemmons
City of Lakeland
Manager of Legislative and Regulatory Relations
Lakeland Electric
863-834-6595 Work
Cindy.Clemmons@LakelandElectric.com
501 E. Lemon St.
Lakeland, Florida 33801

Enclosure

City of Lakeland/Lakeland Electric
Report to the Florida Public Service Commission Pursuant to
Rule 25-6.0343, F.A.C.
Calendar Year 2023

1) Introduction

a) Name of city/utility
City of Lakeland/Lakeland Electric

b) Address, street, city, zip
501 East Lemon Street
Lakeland, FL 33801

c) Contact information: Name, title, phone, fax, email
Cynthia Clemmons
Manager of Legislative & Regulatory Relations
Lakeland Electric
Phone: (863) 834-6595
Fax: (863) 834-6373
Cindy.Clemmons@lakelandelectric.com

2) Number of meters served in calendar year 2023

136,162

3) Standards of Construction

a) National Electric Safety Code Compliance

Construction standards, policies, guidelines, practices, and procedures at the Lakeland Electric (LE) comply with the National Electrical Safety Code (ANSI C-2) [NESC]. For electrical facilities constructed on or after February 1, 2017, the 2017 NESC applies. 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 Standard

Construction standards, policies, guidelines, practices, and procedures at Lakeland Electric have considered the extreme wind loading standards specified by Figure 250- 2(d) of the NESC 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. Per NESC Rule 250C, LE designs and builds to meet or exceed the extreme wind loading strength requirements for all poles that exceed a height of 60 feet above ground or water level. All structures below this height are designed and built to meet or exceed the requirements of Grade B construction.

c) Flooding and Storm Surges

The LE service territory is not a coastal area and, therefore, not subject to storm surges or other wide-spread significant flooding.

d) Safe and Efficient Access of New and Replacement Distribution Facilities
Electrical construction standards, policies, guidelines, practices, and procedures at Lakeland Electric provide for placement of new and replacement distribution facilities so as to facilitate safe and efficient access for installation and maintenance. All new facilities are installed such that they will be accessible by construction crews and vehicles to ensure proper maintenance/repair is performed as expeditiously and safely as possible. Lakeland Electric considers relocating poles and lines from rear lots to roadside when we plan significant reconstruction of those line sections.

e) Attachments by Others
Lakeland Electric's engineering and construction standards account for the influence of potential telecommunications attachments for pole strength and height in maintaining compliance to the applicable NESC standards. Additionally, the current City of Lakeland documents governing pole attachments with external entities include requirements that those making the licensed attachments comply with NESC requirements in their design, construction, operation, and maintenance activities.

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.
Lakeland Electric aims to inspect all wood poles on its system every eight years. Lakeland Electric's pole inspection Contractor inspects all wood poles using visual and the sound and bore techniques with ground line excavation and strength assessment that include all pole attachments. Additionally, LE personnel inspects for T&D facility damage throughout the service territory during the course of normal travel, operations work, and in response to outages. LE also uses concrete and tubular steel poles which receive a visual inspection only.

b) Describe the number and percentage of transmission and distribution inspections planned and completed for 2023.

Pole inspection results	Distribution	Transmission	Total
Poles planned for inspection	7,273	50	7,286
Percentage planned	12.5 %	12.5%	12.5%
Poles inspected	14,084	54	14,138
Percentage inspected	24.2%	13.5%	24.1%

The number and percentage of poles planned for inspection are the total in each category divided by eight (eight-year cycle). Since the inspections are done by geographical region, the actual number of poles inspected may be slightly higher or lower than the expected numbers.

c) Describe the number and percentage of transmission poles and structures and distribution poles failing inspection in 2023 and the reason for the failure.
In 2023, five transmission poles (9.3% of those inspected), and 1,524 distribution poles (10.8% of those inspected), failed to meet minimum strength requirements due to decay.

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 2023, including a description of the remediation taken.
All poles recommended for strengthening from the inspections during the calendar year of 2023 were assessed for appropriate action.

Distribution poles replaced, repaired, or removed in 2023: 512

Transmission poles replaced, repaired, or removed in 2023: 0

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.
Lakeland Electric's vegetation management programs entails circuit-based maintenance provided by contractual services. Species specific distance trimming and directional pruning techniques are incorporated to maximize tree/conductor separation and to establish a three-year trim cycle on the transmission and distribution circuits. If any vegetation conflict occurs on a 3-phase feeder or transmission circuit prior to the proposed maintenance schedule, it will be prioritized to ensure system reliability.
Lakeland Electric's tree removal program includes trees less than twelve inches in diameter that will require future maintenance. Tree replacement certificates are used as an incentive to promote proper tree selection and energy conservation. Tree planting information booklets include setback recommendations that correspond with the City of Lakeland and Polk County Land Development Codes.

Lakeland Electric finds these practices are sufficient because the anticipated tree growth will generally not exceed the established three-year tree trim cycle and there are budgetary allowances for any priority situations.

b) Describe the quantity, level, and scope of vegetation management planned and completed for transmission and distribution facilities in 2023.
230 kV transmission lines: Lakeland Electric inspected 27 miles of BES to verify vegetation

clearance meets or exceeds the FAC-003 compliance requirements.
8.60 miles were planned and completed.
69 kV sub-transmission lines: 12 miles of were planned. 12 miles completed.
12 kV distribution lines: 380 miles were planned. 400 miles were completed.
Distribution maintenance includes the trimming required for secondary voltage spans not calculated in the stated mileage.

All maintenance trimming was inspected to verify that it meets the required Lakeland Electric clearance specifications.

6. Storm Hardening Research

Lakeland Electric 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 will provide the FPSC with a report of research activities. For further information, contact Amy Zubaly, Executive Director, FMEA, 850-224-3314, ext.1, or azubaly@flpublicpower.com.