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UTILITY BOARD OF THE CITY OF KEY WEST

February 5, 2026

Penelope Buys
Florida Public Service Commission
Sent via e-mail to pbuys@PSC.STATE.FL.US

RE: Facility Inspections and Vegetation Management Report for Keys Energy Services pursuant to Rule 25-6.0343, FAC for 2025

Dear Ms. Buys:

Pursuant to Rule 25-6.0343, Florida Administrative Code, attached is the 2025 Facility Inspections and Vegetation Management Report for the Utility Board of the City of Key West dba Keys Energy Services (KEYS).

If any questions develop during your review, please do not hesitate to contact me at 305.295.1050.

Sincerely,

Sam Gaccione
Director of Engineering & Control
Ph. 305-295-1050
Samuel.Gaccione@KeysEnergy.com

SG/cdc

Copied via electronic mail:
L. Tejeda, General Manager & CEO
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M. Alfonso, Supervisor of Engineering
G. Castellon, Supervisor of T&D
J. Diaz, Supervisor of T&D
Amy Zubaly, FMEA Executive Director

1) Introduction

a) Utility Name: The Utility Board of the City of Key West, Florida
dba Keys Energy Services (KEYS)

b) Address: 1001 James Street
P. O. Box 6100
Key West, Florida 33040

c) Contacts: Lynne Tejeda, General Manager/CEO
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NOTE: This report was developed by Sam Gaccione. For questions and/or clarifications, please contact Sam Gaccione at 305.295.1050.

2) Number of Meters Served in Calendar Year

a) December 2025: 32,148 Meters

3) Facility Inspections

a) KEYS Policy, Guidelines, Practices and Procedures as they relate to Pole Testing:

Distribution Poles-

- KEYS elected to test all poles for NESC compliance.
- KEYS is maintaining an 8-year inspection cycle, but electing to test 50% of its poles every 4-years.
- Testing is performed by a contractor. Osmose Utilities Services, Inc. was awarded the last bid.
- Osmose Utilities Services, Inc. performed the tasks below:

Item #	Task Description
1	Site visit and visual inspection of pole (concrete and wood)
2	Sound and bore test for wood
3	Excavated base - soil around wood pole -- Reject pole
4	Excavated base - soil around wood pole -- External treat
5	Excavated base - soil around wood pole -- External treat, then reinforce using cost items below
6	Internal treat of wood pole
7	Difficult accessible (poles located in rear lot lines)
8	Ground wire repair near pole base
9	Load calculation assessment per pole as per PSC
10	Digital images/photos for reject poles and code problems in items (18,19 and 20)
11	Computerized report of task performed per pole (includes 3 copies of software)
12	Install "Guy Guard" on Down Guy
13	Osmose C2 external steel reinforce installation at base (35' wood pole) (All labor and material)
14	Osmose C2 external steel reinforce installation at base (40' wood pole) (All labor and material)
15	Osmose C2 external steel reinforce installation at base (45' wood pole) (All labor and material)
16	Down guy wire and anchor rod inspection (6" below grade)
17	Identify/document locations of missing KEYS' pole # on the pole
18	Identify/document locations that the "pole ground rod" extends above grade/ground
19	Identify/document ADA non-compliance (b/w pole and any object) if clearance is lower than 33" (on sidewalks).
20	Identify/document locations that clearance between pole and fire hydrant is - less than four feet (at ground level).
21	Identify/document locations where clearance b/w OH wire and structure is less than 10 ft. (overhead).
22	Joint Use Survey of two other utility attachments (for each of the foreign attachments).

Transmission Poles-

- KEYS has no "wood" transmission poles.
- KEYS has only one incoming transmission line into its service territory. This is a combination of concrete and metal poles.
- An aerial inspection is performed every two years.
- Infrared survey - KEYS performs a 100% infrared inspection every two years.

b) Number and Percentage of Transmission and Distribution Pole Inspections planned and completed:

Distribution Poles

- Completed in 2023 - Osmose Utility Services, Inc. under contract with KEYS.
  - Sound and bored wood poles in 50% of KEYS service territory.
- Planned - KEYS plans to visually inspect, sound, and bore the remaining 50% of its wood distribution poles in 2027.

Transmission Facility Inspections-

- Aerial inspection - 100% inspected in 2024.
- Aerial inspection sub transmission (69kv) - 100% inspected in 2024.

c) Number and percentage of transmission poles, structures and distribution poles failing inspection and reason for the failure:

- Transmission & Sub Transmission-
  - Number of poles failed (rejected) -0
  - Percentage of rejected failed rate -0%
- Distribution-
  - See detail summary in Table 1

Table 1

Pole Testing Summary Distribution - Testing 2023

Test Area	KEYS Energy	AT&T	Combined Totals
Total Distribution Poles Tested	**6783**	**232**	**7015**
Total Concrete Poles Tested	4224	1	4225
Total Ductile Iron Poles Tested	638	1	639
Total Wood Poles Tested	1921	230	2151
% of Total Poles Tested	60.4%	11.8%	53.1%

Reject/Failed Pole Summary	**543**	**77**	**620**
Total Concrete Rejects	26	0	26
% of Concrete	0.6%	0%	0.6%
Total Wood Pole Rejects	517	77	594
% of Wood	27%	33%	28%
Total Ductile Iron Pole Rejects	0	0	0
% of Ductile Iron	0%	0%	0%

Reject/Failure Reasons	KEYS	AT&T	Total
Decayed Top	25	6	31
% Decayed Top	4.6%	7.8%	5.0%
Mechanical & Excessive Damage	26	4	30
% Mechanical & Excessive Damage	4.8%	5.2%	4.8%
Hollow - Enclosed Pocket	30	1	31
% Hollow - Enclosed Pocket	5.5%	1.3%	5.0%
Rotten/Shell Rot	417	56	473
% Rotten/Shell Rot	76.8%	72.7%	76.3%
Split Top	24	5	29
% Split Top	4.4%	6.5%	4.7%
Woodpecker Holes	21	5	26
% Woodpecker Holes	3.9%	6.5%	4.2%

d) Number and Percentage of T&D Poles Replaced and the Remediation Plan to Correct:

Transmission Facilities Plan-

- A contract was issued for the replacement of one concrete transmission pole. This work was completed in January 2025.
- KEYS received a Hurricane Irma Hazard Mitigation Grant to install galvanic cathodic protection technology on concrete pole structures not currently exhibiting spalling with the intent of proactively preventing the spalling. This work was completed in 2025.
- KEYS inspection showed some concrete transmission poles with spalling at the top of the pole. KEYS repaired all poles with this spalling and added a pole to cap to mitigate future spalling.

Distribution Facilities Plan-

KEYS plans to replace 100 distribution poles per year with storm hardened poles. KEYS crews will replace approximately 100 poles per year with any pole failing the 2023 testing being replaced first.

Approximately 36% of KEYS distribution poles have been replaced with poles that meet the extreme wind requirements.

4) Vegetation Management Program

Mission:

- Keys Energy Services (KEYS) is dedicated to maintaining safe clearances surrounding electrical facilities to reduce outages and increase the public's safety and awareness. This is achieved through various programs including, continuous zone trimming, tree safety press releases, Tree Give-A-Way, and by responding to Customer Service requests for vegetation management. The following information describes KEYS programs in greater detail.

KEYS Service Area:

- KEYS' service area consists of 340 OH & UG miles of 3 phase distribution lines & 68 miles of transmission lines.

KEYS Staff and Contractual Crews:

- KEYS has a total of four tree trimming crews, two in-house crews and two contractor crews. KEYS in-house crews maintain all customer request orders, revisit tree trimming list as well as zone trimming and tree removals. Contractor crews specifically work in zone trimming and tree removals. All work is compiled and documented, such as footage, tree removals, zone trimming and man-hours it takes to complete these zones.
- Crews have received special training in the line clearance tree trimming and follow arborist guidelines for utilities, which specify how trees should be cut. Industry standards specify the minimum safety clearances that must be maintained for safety and for reliability.

KEYS Trim Cycle Information:

- KEYS implemented a policy to maintain a two-year cycle for system trimming, which KEYS has been able to complete in this time frame. This two-year cycle has been in place since 2000, which includes trimming of all three-phase feeders, laterals, secondary and communication conductors.
- KEYS performs a quarterly maintenance of tree clearances on all the 68 miles of transmission lines and maintains these clearances.
- KEYS averages approximately six customer requests a day, the low volume of requests are due to the cycle trimming that is in place. KEYS in house crews spend approximately 85% of their time on customer-generated requests, which include service trims, communication, and conductor trims. When not working on customer requests, the KEYS crews work on revisits and zone trimming.

- While zone trimming contractor crews as well as KEYS, tree crews remove all invasive trees in the right-of-way and easements. Trees are cut to ground level and sprayed with an herbicide to prevent re-growth.

Problem Trees Outside of Right-Of-Ways or Easements:

- For customer trees that are infringing into KEYS lines, KEYS makes contact with the customer and explains the safety issues that exist with a tree getting into high voltage lines. Most customers are receptive to the tree removal once contacted by KEYS.

Addressing appropriate planting and landscaping:

- KEYS has a tree give-a-way program that has been in place since 1995 to help promote energy conservation and public awareness. KEYS helps customers determine the proper placement of the tree to maintain adequate clearance from facilities with one-on-one consultation. KEYS personnel reviews a site layout of the customer's yard and advice on the best placement for shade benefit and proper clearance. During the consultation, KEYS gives the customer a brief summary of what type of problems may occur if a tree was to be placed under the high voltage lines/service drops. Generally, the customer agrees to plant the tree where KEYS indicates on the layout of the property resulting in fewer future tree-trimming problems and increases safety.

Benchmark Reports on Vegetation Management:

- KEYS implementation of the two-year trim cycle, revisit list, tree removals, tree give-a-way program, and public service announcements, responding to customer request and hiring contractor crews for zone trimming has allowed KEYS to reduce outages.
- KEYS maintains records and produces an annual report of all outages throughout the system. In 2025, KEYS had 4 feeder outages and 6 lateral outages due to vegetation. KEYS attributed 32 feeder recloses and 17 lateral outages to unknown causes. These proactive measures have resulted in the low number of occurrences due to KEYS Vegetation Management Program. KEYS will strive to continue to improve this program, further reduce outages, and increase safety to the public and KEYS employees.

LINE CLEARANCES

KEYS strives to maintain the following line clearances where practical as follows:

- 15 feet clearance on all transmission lines.
- 10 feet clearance on all open conductors greater than 600 volts (where possible).
- Five feet minimum clearance on all open conductors less than 600 volts (where possible).
- Three feet minimum clearance on all communication conductors.

The Public Utility Research Center held two vegetation management workshops in 2007 and 2009. KEYS reviewed their reports and will use the information to continually improve vegetation management practices. Through FEMA, KEYS has a copy of their reports and will use the information to continually improve vegetation management practices. We will participate in future best-practice workshops if there is interest.