

Patric R. O'Brien Assistant General Counsel

February 9, 2016

VIA ELECTRONIC FILING

Honorable Kathleen H. Burgess Secretary New York State Public Service Commission Three Empire State Plaza Albany, New York 12223-1350

Re: Case 04-M-0159 – Proceeding on Motion of the Commission to Examine the Safety of Electric Transmission and Distribution Systems – 2015 ANNUAL REPORT

Dear Secretary Burgess:

Niagara Mohawk Power Corporation d/b/a National Grid submits for filing its 2015 Annual Stray Voltage Testing and Facility Inspection Report in the above proceeding.

Should you have any questions or concerns, please do not hesitate to contact me. Thank you for your time and attention.

Respectfully submitted,

/s/Patric R. O'Brien Patric R. O'Brien

Attachments

State of New York Public Service Commission

Case 04-M-0159

Niagara Mohawk Power Corporation d/b/a National Grid

Stray Voltage Testing and Facility Inspection

2015 Annual Report

Report on the results of stray voltage testing and facility inspections for the 12-month period ended December 31, 2015

February 9, 2016

Table of Contents

I.	Background	3
II.	Company Overview	3
III.	Stray Voltage Testing Program	4
IV.	Facility Inspection Program	6
V.	Company Facilities	7
VI.	Annual Performance Targets	8
VII.	Certifications	11
VIII.	Analysis of Causes of Findings and Stray Voltage	11
IX.	Analysis of Inspection Results	12
X.	Quality Assurance	14

I. <u>Background</u>

The New York State Public Service Commission's ("Commission") Electric Safety Standards adopted on January 5, 2005 in Case 04-M-0159, with subsequent revisions issued on July 21, 2005, December 15, 2008, March 22, 2013, and January 13, 2015 (collectively referred to herein as the "Safety Standards" or "Order"), require annual stray voltage testing of certain electric facilities accessible to the public and inspections of utility electric facilities on a minimum of a five-year cycle.

In the March 22, 2013 Order, the Commission revised the annual testing requirement for stray voltage. Under the revision, overhead distribution facilities, underground residential distribution ("URD") facilities, overhead and underground transmission structures, and substation fences will be tested for stray voltage at least once every five years. Streetlights and underground distribution facilities will continue to be tested annually.

This report describes Niagara Mohawk Power Corporation's d/b/a National Grid ("Niagara Mohawk" or "Company") stray voltage detection program and facility inspection program conducted for the 12-month period ended December 31, 2015.

II. <u>Company Overview</u>

Niagara Mohawk provides electric service to approximately 1,600,000 customers in a service area of approximately 25,000 square miles in New York State. The Company operates an electric transmission and distribution system. For the stray voltage detection and facility inspection programs, Niagara Mohawk divides its system into subprograms to schedule and track testing and inspections. The subprograms include the Company's (a) distribution overhead system, (b) distribution and transmission underground system, (c) streetlight system, (d) transmission overhead system, and (e) substations.

a. Distribution Overhead System

Niagara Mohawk's distribution overhead system consists of structures supporting circuits energized at voltages of up to 15kV and spans close to 32,000 miles. Stray voltage testing of the distribution system is currently performed by Niagara Mohawk and contractors. Facility inspections of the distribution system are currently performed by the Company's internal workforce and contractors.

b. Distribution and Transmission Underground System

Niagara Mohawk's distribution and transmission underground system is made up of facilities such as manholes, hand-holes, vaults, and switchgear. Fiberglass hand holes are exempt from stray voltage testing under the Safety Standards.¹ Stray voltage testing of the Company's underground system is currently performed by contractors. Facility inspections of the underground system are currently performed by contractors.

¹ See July 21, 2005 Order, at 23; March 22, 2013 Order, at Appendix A, 3(c).

c. Streetlight System

Niagara Mohawk's streetlight system contains underground fed metallic streetlight standards and municipally-owned streetlights and traffic control devices. Overhead fed streetlights on wooden poles are not counted within the streetlight program for stray voltage testing. For the underground fed metallic streetlight standards, contractors perform the stray voltage testing at night when the lights are operational. Stray voltage testing on traffic control devices takes place in conjunction with the contractors' testing of the overhead and underground systems during the daytime hours. The streetlight facility inspections on Company-owned facilities take place during the day and are performed by an external workforce.

d. Transmission Overhead System

Niagara Mohawk's transmission overhead system, which includes the sub-transmission system, consists of structures that support circuits energized at voltages of 12 kV, 23kV, 34.5kV, 46kV, 69kV, 115kV, 230kV, and 345kV. The transmission system spans the entire state and is approximately 8,465 miles in length. Stray voltage testing on the transmission system is performed by Niagara Mohawk and contractors.

e. Substations

There are 908 substations in Niagara Mohawk's service territory. Stray voltage results for substation fences were collected internally by the operating group. The initial dataset identified 908 substation locations to be tested of which a number of these are customer-owned locations.

III. <u>Stray Voltage Testing Program</u>

During the calendar year that ended December 31, 2015, the Company conducted stray voltage testing of 100% of all Company and non-Company owned metallic streetlights and traffic signals and 100% of all publicly accessible Company-owned underground distribution facilities that are capable of conducting electricity. In addition, the Company conducted stray voltage testing of its publicly accessible overhead distribution facilities, URD facilities, overhead and underground transmission structures, and substation fences that are capable of conducting electricity.

In addition, and in compliance with the Safety Standards, Niagara Mohawk:

a. Immediately safeguarded and/or mitigated all voltage findings ≥ 1.0 volt. In instances where the stray voltage finding was determined to be caused by customer-owned equipment, the area was immediately made safe and the customer or responsible person associated with the premises was notified of the unsafe condition and the need for the customer to arrange for a permanent repair. Voltage findings determined to be caused by a Company-owned facility were immediately safeguarded and/or mitigated. All permanent repairs were made within 45 days.

- b. Tested all publicly accessible structures and sidewalks within a 30 foot radius of the electric facility or streetlight where there was a stray voltage finding ≥ 1.0 volt.
- c. Responded, investigated, and mitigated positive findings of shock incidents reported by the public.

Niagara Mohawk visited 403,862 facilities for stray voltage testing in calendar year 2015. Testing was not required on 125,258 facilities because: the facilities are wood utility poles that have no attached appurtenances capable of conducting electricity; the facilities' electrically conductive appurtenances are not accessible to the public (pre-wired wood); the facilities are enclosed in fiberglass (non-conductive materials); the facilities are de-energized; and/or the facilities are inaccessible to the public.

Inaccessible facilities include:

- a. <u>Locked Gate/Fence</u> Poles behind locked gates and fences that are not accessible to the public, *i.e.*, facilities located in fenced areas owned by other utilities such as water companies.
- b. <u>Dangerous Grades</u> Poles located on cliffs and other dangerous grades are generally inaccessible to Company personnel and the general public and are approached only under urgent circumstances. The performance of stray voltage testing on these facilities would constitute an unacceptable risk to the employee.
- c. <u>Company Property</u> Poles located on Company property such as substations are accessible only to Company personnel and authorized contractors.
- d. <u>Vaults</u> Structures located inside buildings. These structures are accessible only to Company and building maintenance personnel.
- e. <u>Limited Access Highway Facilities</u> Structures located on highways and exit and entrance highway ramps. The performance of stray voltage testing on these structures would constitute an unacceptable risk to the employee.

As required by the Safety Standards, Niagara Mohawk performed 3,161 miles of mobile testing system scans between January 1, 2015 and December 31, 2015. A summary of the results of the mobile testing scans is contained in Appendix 8, which is a copy of the Company's mobile scan report filed with the Commission on December 9, 2015.

IV. Facility Inspection Program

The Safety Standards require Niagara Mohawk to visually inspect approximately 20% of its facilities annually, resulting in a five-year inspection goal for all facilities to be inspected.

Niagara Mohawk visually inspects its overhead distribution and transmission systems on a fiveyear cycle from the ground, as prescribed by the Safety Standards.

In addition, Niagara Mohawk performs the following inspections, some of which are recurring on specific cycles, some of which are scheduled on an as-needed basis:

- Aerial Infrared Helicopter-based thermographic imaging of connections and equipment.
- Tower Footing Embedded support structure that supports a transmission tower.
- Wood Pole Inspection of the wood pole at and below the ground line.
- Aerial Patrols Helicopter based visual examination of transmission facilities and equipment.
- Comprehensive Helicopter Patrol A comprehensive methodical examination of all components comprising the transmission system by helicopter.

Niagara Mohawk's ground-based visual inspection program is segmented into five categories: distribution facility inspection; underground facility inspections; streetlight inspections; transmission facility inspections; and substation inspections.² Each program is summarized by its associated procedure document. The inspections include visual inspections of the assets to determine if deficiencies exist. Deficiencies are captured by codes entered into handheld computers. Data is then downloaded for review and follow up work.

In accordance with the Safety Standards, Niagara Mohawk uses the following severity levels to establish priority for repairs and scheduling:

- a. <u>Level I</u> Repair as soon as possible but not longer than one week. A Level I classification represents an actual or imminent safety hazard to the public or a serious and immediate threat to the delivery of power. Critical safety hazards present at the time of the inspection shall be guarded until the hazard is mitigated.
- <u>b.</u> Level II Repair within one year. A Level II classification represents conditions that are likely to fail prior to the next inspection cycle and represent a threat to safety and/or reliability should a failure occur prior to repair.

² Substation inspections are more complex than those performed on other facilities and differ in variety of ways including, but not limited to: inspection schedules, system that captures inspection data, and work prioritization (supervisory review determines work to be completed versus Levels I-IV). Substation inspection procedure and protocols are provided in Attachment 15 (SMS 400.06.1 entitled "Substation V&O Inspection Standard" and SMP 400.06.2 entitled "Substation V&O Inspection Procedure).

- c. <u>Level III</u> Repair within three years. A Level III classification represents conditions that do not present immediate safety or operational concerns and would likely have a minimal impact on the safe and reliable delivery of power should a failure occur prior to repair.
- <u>d.</u> <u>Level IV</u> A Level IV classification represents conditions found, but repairs are not needed at this time. Level IV is used to track atypical conditions that do not require repair within a five-year timeframe. This level is used for future monitoring purposes and planning proactive maintenance activities.

In accordance with the Safety Standards, when a temporary repair is located during an inspection or is performed by the Company, best efforts are made to make a permanent repair of the facility within 90 days. Temporary repairs that remain on the system for more than 90 days are due to extraordinary circumstances (*i.e.*, storms and outage constraints), and usually require extensive repair activity. Niagara Mohawk has compiled a list of exceptions of temporary repairs that still remain in place after the 90 day requirement. The list and justifications can be found in Appendix 5 of this report.

Niagara Mohawk provides classroom and field training to personnel inspecting facilities in accordance with the Company's Electric Operating Procedures ("EOPs"). The classroom training covers topics including: EOPs, distribution maintenance inspection and elevated voltage testing training, Computapole handheld training, Computapole database training, distribution vegetation training, geographic information system training, feeder patrols training, and basic electricity training.

The Company provides new distribution inspectors with training upon hiring, with ongoing yearly refresher courses. As part of the refresher training, Niagara Mohawk updates all training materials due for updates from the following year. Specifically, the updates are done yearly using relevant EOPs and Company standards that have been updated.

V. <u>Company Facilities</u>

Niagara Mohawk has approximately 1,525,011 individual facilities that must be visited for stray voltage testing and approximately 1,567,943 individual facilities that require a facility inspection. These facilities are broken down into the following five main categories and are summarized in the tables beginning on page 9:

a. Distribution Overhead – The Company's testing criterion for distribution overhead facilities involves testing all Company-owned or jointly-owned wood poles with utility electrical facilities located on both public thoroughfares and customer property, including backyards or alleys. Stray voltage testing is performed on all wooden poles with metallic attachments such as ground wires, ground rods, anchor guy wires, riser pipes, or any electrical equipment within reach of the general public. Distribution overhead facilities are included in both the stray voltage and facility inspection programs.

b. Distribution and Transmission Underground Facilities –The Company's testing criterion for underground facilities involves testing all subsurface structures, including above ground, pad-mounted structures. Included in the underground facilities are padmount switchgear cases, padmount transformer cases, electric utility manhole covers, submersible transformer covers, electric utility handhole covers, network vaults, and grates. These facilities are included in both the stray voltage and facility inspection programs. Inspections of the underground system involve underground and padmount assets.

c. Streetlights and Traffic Signals – Streetlights include Company-owned metal pole streetlights and municipal-owned metal pole streetlights to which the Company provides service. The testing criterion for streetlights and traffic signals involves testing all metal pole streetlights, traffic signals, and pedestrian crosswalk signals located on publicly accessible thoroughfares. Stray voltage testing of streetlights is performed at night while the fixtures are energized. Privately-owned light fixtures are not included in the stray voltage testing program per the Safety Standards.³ All Company-owned streetlights are included in the facility inspection program.

d. Substation Fences - Niagara Mohawk operates and maintains 908 substation facilities that are necessary for the operation of the electric grid. These substations are fenced in for security, as well as to ensure the safety of the general public. Substation fences are included in the stray voltage testing program.

e. Transmission Overhead Structures – The testing criteria for transmission overhead structures involves testing all structures, guys, and down leads attached to the facilities. Transmission structures support circuit voltages of 12 kV and greater. Transmission poles with distribution underbuild are included in the transmission category. All transmission structures are included in both the stray voltage and facility inspection programs.

VI. <u>Annual Performance Targets</u>

In compliance with the Safety Standards, Niagara Mohawk met the annual performance target for stray voltage testing of 20% of overhead distribution facilities, URD facilities, overhead and underground transmission structures, and substation fences, as well as 100% of metallic streetlights and underground distribution facilities. In addition, in compliance with the Safety Standards, Niagara Mohawk met the annual performance target for inspection of approximately 20% (*i.e.*, 95% of the annual target of 20%, or 19%) of its electric facilities for the period that ended December 31, 2015.

³ March 22, 2013 Order, at Appendix A, §§ 1(d) and 3(a).

The results are summarized in the tables below.

Elevated Voltage Testing Annual Summary			
Program	Total Units	Units Completed in	% Completed
		2015	
Distribution**	1,308,890	268,752	20.532
Underground	28,343	28,343	100.000
Streetlights*	84,814	84,814	100.000
Transmission**	102,056	22,225	21.777
Substation	908	908	100.000

Stray Voltage Testing Results

*Note: Streetlights include traffic controls but exclude fiberglass standards.

**Note: Pursuant to the March 22, 2013 Order, the Company is required to test 100% of streetlights and underground distribution facilities annually. Overhead distribution facilities, URD facilities, overhead and underground transmission structures, and substation fences are required to be tested at least once every five years.

Facility Inspection Program Results

Category	Total System Units	Units Completed in 2015	Actual Inspected in 2015
Overhead	1,238,964	255,736	20.641%
Distribution			
Overhead	103,181	22,679	21.979%
Transmission			
Underground	93,698	17,254	18.414%
Pad-mounted	66,262	12,268	18.514%
Transformers			
Streetlights	65,838	12,664	19.235%
TOTAL	1,567,943	320,601	20.447%

Inspection Performance Summary

Overhead Distribution Facilities

Inspection	Number of Overhead	% of Overall System
Year	Distribution Structures Inspected	Inspected (Cumulative)
2015	255,736	21%

Overhead Transmission Facilities

Inspection	Number of Overhead	% of Overall System
Year	Transmission Facilities Inspected	Inspected (Cumulative)
2015	22,679	22%

Underground Facilities

Inspection	Number of Underground	% of Overall System
Year	Facilities Inspected	Inspected (Cumulative)
2015	17,254	

Padmount Transformers

Inspection	Number of Padmount	% of Overall System
Year	Transformers Inspected	Inspected (Cumulative)
2015	12,268	19%

<u>Streetlights</u>

Inspection Year	Number of Streetlights Inspected	% of Overall System Inspected (Cumulative)
2015	12,664	19%

VII. <u>Certifications</u>

Pursuant to Section 7 of Appendix A of the Safety Standards, the president or officer of each utility with direct responsibility for overseeing stray voltage testing and facility inspections shall provide an annual certification to the Commission that the utility has, to the best of his or her knowledge, exercised due diligence in carrying out a plan, including quality assurance, that is designed to meet the stray voltage testing and inspection requirements, and that the utility has:

- Tested its publicly accessible electric facilities and street lights in accordance with the Safety Standards, and
- Inspected the requisite number of electric facilities.

The certifications are attached as Appendix 17 to this report.

VIII. Analysis of Causes of Findings and Stray Voltage

The Safety Standards require the electric utilities to perform an inventory on all stray voltage findings and report on the number of these findings each year. Section 1(f) of the December 15, 2008 Order defines a finding as "[a]ny confirmed voltage reading on an electric facility or streetlight greater than or equal to 1 volt measured using a volt meter and 500 ohm shunt resistor." Section 1(c) defines stray voltage as "[v]oltage conditions on electric facilities that should not ordinarily exist. These conditions may be due to one or more factors, including, but not limited to, damaged cables, deteriorated, frayed, or missing insulation, improper maintenance, or improper installation." Utilities are required to report on all findings whether or not the voltage is normal to the electric system.

Niagara Mohawk identified 83 instances of stray voltage during the Company's manual stray voltage testing program in 2015. These voltages resulted from a variety of conditions including: deterioration of conductors; age of equipment; exposure to the elements; and various customer related issues. A majority (25) of stray voltage conditions identified were on distribution structures. Down grounds was the leading cause of stray voltage findings.

The following table contains a breakdown of the causes of stray voltage findings identified through the Company's 2015 manual testing effort. Niagara Mohawk has repaired and/or mitigated all findings that were determined to be hazardous. Mobile testing findings are addressed in the Mobile Stray Voltage Testing Report attached as Appendix 8.

Structure Type	Cause of Stray Voltage	Stray Voltages Found
Distribution	Cable & Ground	1
Distribution	Cable Feed	1
Distribution	Down Ground	7
Distribution	Equip Other	2
Distribution	Ground Connection	5
Distribution	Guy	4

Distribution	Neutral	5
Street Lights – Traffic Signals	Info Missing	26
Street Lights – Traffic Signals	Cable Feed	2
Street Lights – Traffic Signals	Equip Other	1
Street Lights – Traffic Signals	Ground Connection	4
Street Lights – Traffic Signals	None Required	2
Street Lights – Traffic Signals	Poor Insulation	1
Street Lights – Traffic Signals	Remade All Connections	1
Street Lights – Traffic Signals	Service Wire	1
Transmission	Down Ground	16
Transmission	Ground Connection	1
Transmission	Guy	3
TOTAL		83

In accordance with the Safety Standards, when Niagara Mohawk discovered a finding on an electric facility or streetlight during stray voltage testing, the Company tested all publicly accessible structures and sidewalks within a minimum 30 foot radius of the electric facility or streetlight. Niagara Mohawk did not identify any additional findings associated with the initial test structure as a result of the 30-foot radius testing.

IX. Analysis of Inspection Results

Note: Total Number of Deficiencies may add up to more than the total Locations with Deficiencies due to deficiencies on multiple facilities at a single location.

Overhead Distribution Structures

Table of Locations with Deficiencies			
Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies	
255,736	113,290	44.299%	

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	741	0.346%
2	11,434	5.351%
3	60,550	28.340%
4	140,929	65.961%
Total:	213,654	100.000%

Breakdown of Locations with Deficiencies

Overhead Transmission Facilities

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies		
22,679	16,597	73.182%		

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	15	0.048%
2	367	1.183%
3	2,676	8.630%
4	27,948	90.137%
Total:	31,006	100.000%

Underground Facilities

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
17,254	8,495	49.234%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	92	0.960%
2	564	5.886%
3	105	1.095%
4	8,821	92.058%
Total:	9,582	100.000%

Pad-mount Transformers

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
12,268	3,283	26.760%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	47	0.626%
2	435	5.794%
3	0	00.000%
4	7,025	93.579%
Total:	7,507	100.000%

<u>Streetlights</u>

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
12,664	8,582	67.766%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found		
1	9	0.067%		
2	214	1.606%		
3	19	0.142%		
4	13,076	98.182%		
Total:	13,318	100.000%		

In 2015, Niagara Mohawk identified an overall total of 275,067 deficiencies:

- Priority Rating 1 Total = 904, or 0.328% of the overall total.
- Priority Rating 2 Total = 13,014, or 4.731% of the overall total.
- Priority Rating 3 Total = 63,350, or 23.030% of the overall total.
- Priority Rating 4 Total = 197,799 (inventory), or 71.909% of the overall total.

X. <u>Quality Assurance</u>

Electric Quality Assurance/Quality Control Program

National Grid's Elevated Voltage ("EV") and Visual Inspection & Maintenance ("I&M") Quality Assurance/Quality Control program provides for increased program continuity, monthly audits for monitoring of program performance, and assurance that a Quality Assurance/Quality Control ("QA/QC") program independent of the EV and I&M work groups is maintained. Separate of the independent Electric QA/QC program, Quality Control ("QC") assessments audits are conducted by National Grid I&M supervisory staff. The purpose of the QC audits is to self-validate recorded findings involving all distribution, transmission, and sub-transmission assets that have been inspected to identify potential maintenance codes and elevated voltage issues. Conversely, the independent Electric QA/QC program encompasses a quantitative random sampling of the entire population of inspection derived from the field audited EV testing and I&M inspections.

Revisions to QAQC Program 2015

The Electric QA/QC program made the following revision in 2015:

- A "Misidentified Maintenance Code" table has been added for 2015. This table provides the reader the trending analysis of maintenance codes that were mistakenly identified by the field inspector for a particular region.
- Additional Maintenance Code table has been revised.

I&M Risk Levels Identified: The analysis of the QA/QC I&M Program data is intended to identify the nature and magnitude of Risk Level 1 and 2 as applicable to the I&M Program results.

Electric QA/QC I&M Risk Level Definitions

QA/QC program involves performing an additional QA/QC audit of randomly-selected assets having been previously assessed by the field inspector, with the intent of verifying previously identified maintenance codes.

<u>Risk 1</u>

- Reliability/Safety Concern.
- Identified facility/component repaired or replaced within one week of the inspection date.

<u>Risk 2</u>

- Facility/component condition that must be repaired/replaced within one year.
- QA/QC identification of maintenance codes that may affect reliability.

<u>Risk 3</u>

- Facility/component condition that must be repaired/replaced within three years.
- QA/QC identification of maintenance codes that may not affect reliability.
- The QA/QC inspector determined the original I&M inspector's maintenance code was incorrect.
- The independent field inspector determines a data quality issue.

Asset Inspection & Maintenance Audits

National Grid's Electric QA/QC group audited 7,351 distribution, transmission and sub-transmission assets that had been field inspected for maintenance during 2015. The method used to confirm and/or achieve the required quality of asset audits involved follow-up field audits by QA/QC personnel through a monthly random sample, with the intent of verifying identified maintenance codes derived from the population of assets inspected by field force operations during calendar year 2015. This process captured incorrect or missed maintenance codes, and noted timeliness of repairs when evident. To achieve a minimum 95% level of confidence, applicable to the entire population of inspection data and resulting random sample analysis, commonly applied statistical principles were utilized to conduct the audit process.

The QA/QC field audit process is designed to validate the field inspector findings. Results are considered to be passing when there is a match between the field inspection maintenance codes and QA/QC follow-up audit results. Based upon the accrued inspection data provided by the Company's Inspections Department, and the findings identified through follow-up QA/QC process, the overall accuracy of field inspection findings that impacts reliability (Risk 1 and Risk 2), was validated at **95**%.

2015 Field Inspections – QA/QC Audit Results

The following table illustrates the population and breakdown of assets inspected by field force and field compliance percentages related to system reliability concerns (Risk Levels 1&2 findings) identified through QA/QC process during calendar year 2015:

Asset Category	I&M Field Inspector	UA/UK Rield Allaffor $-$				Compliance Percent (%)	
	Assets Inspected	Assets Audited	MCodes Audited	Risk 1	Risk 2		
Distribution	255,736	6323	9,076	2	490	95%	
Sub-Transmission	10,920	561	996	0	24	98%	
Transmission	11,759	467	665	665 0 31		95%	
		Total Compliance Percent 95%					

QA/QC I&M Audit Analysis

National Grid desires a minimum threshold for inspection compliance percentage at 95%. QA/QC analysis of regional findings by misidentified maintenance codes and also additional maintenance codes are conducted for the purpose of determining compliance percentage of maintenance code trending for a particular region.

- <u>Misidentified MCode</u> When the field inspector incorrectly identifies a maintenance code for a condition found at a structure.
- <u>Additional MCode</u> When the QAQC inspector identifies a maintenance code that the field inspector did not account for at a structure.

If the compliance percentage is less than 95% to 90%, the electric QA/QC group conducts further analysis of accrued data for potential trending. Operations is responsible for corrective action where applicable. If the validation accuracy is less than 90%, Operations is responsible for further trending analysis and/or corrective action and implantation plan to improve field force inspections.

Region	QAQC Misidentified MCodes	MCode Description	Trending Quantity	Total Sample Size Audited YTD	Compliance Percent
48	152-Dist	Transformer missing ground wire at pole	16		98%
	157-Dist	Transformer improper/missing bond	17		98%
	212-Dist	Ground guard required	24	1117	98%
	221-Dist	Guy wire not in compliance with code NESC	15		99%
	291-Dist	Riser – Improper /Missing Bond	11		99%
50	155-Dist	Transformer – Animal Guards Required	21	1037	98%
51	212-Dist	Ground guard required	11	1452	99%
54	212-Dist	Ground guard required	29	1373	98%
60	212-Dist	Ground guard required	23	1432	98%
	221-Dist	Guy wire not in compliance with code NESC	12	1452	99%
62	212-Dist	Ground guard required	11		99%
	221-Dist	Guy wire not in compliance with code NESC	51	1389	96%

QAQC Misidentified Maintenance Code Trends

Region	QAQC added MCodes	MCode Description	QT Y	Total Sample Size Audited YTD	Compliance Percent
48	099-Dist	Streetlight not bonded	16		99%
	115-Dist	Riser guard required	22	-	98%
	116-Dist	Visual rotted pole top	11		99%
	118-Dist	Pole stencil/ correction required	43		96%
	153-Dist	Transformer - LA blown, missing/improper	22		98%
	156-Dist	Non standard bonding of transformer xo bushings	35	1117	97%
	207-Dist	Switch – L.A. Blown/ Missing Bond	11	111/	99%
	212-Dist	Ground guard required	30	-	97%
	221-Dist	Guy wire not in compliance with code NESC	16	-	99%
	225-Dist	Guy wire non standard bonding or Isolation	34		97%
	291-Dist	Riser improper/missing bond	17		99%
	293-Dist	Riser lightning arrester blown, missing/improper	11		99%
	584-SubT	Misc- Install or replace warning signs	24	143	83%
50	116-Dist	Visual rotted pole top	10		99%
	153-Dist	Transformer - LA blown, missing/improper	25	1037	98%
	155-Dist	Transformer – Animal Guards Required	15		99%
	157-Dist	Transformer improper or missing bond	14		99%
	207-Dist	Switch – L.A. Blown/ Missing Bond	22		98%
	212-Dist	Ground guard required	10		99%
	221-Dist	Guy wire not in compliance with code NESC	44		96%
	584- SubT	Mise – Distribution under built	17		80%
	591- SubT	Misc – Distribution under built	13	77	83%
	I				
51	116-Dist	Visual rotted pole top	11	-	99%
	118-Dist	Pole stencil/ correction required	18	-	99%
	153-Dist	Transformer LA blown, missing/improper	13	1452	99%
	155-Dist	Transformer – Animal Guards Required	15	1432	99%
	207-Dist	Switch – L.A. Blown/ Missing Bond	13		99%
	221-Dist Guy wire not i	Guy wire not in compliance with code NESC	33		98%
	584- SubT	Misc – Distribution under built	4	205	98%
54	118-Dist	Pole stencil/ correction required	14		99%
υт	153-Dist	Transformer LA blown, missing/improper	14		<u> </u>
	155-Dist	Transformer – Animal Guards Required	11		<u> </u>
	155-Dist 157-Dist	Transformer improper or missing bond	13	1373	99%
	220- Dist	Guy Wire Marker missing	10		<u> </u>
	220- Dist 221-Dist	Guy wire marker missing Guy wire not in compliance with code NESC	32		99%
	528- SubT	Pole- Aerial number missing	17		89%
	581- SubT	Misc- Stencil Line/Structure Number at Ground	10	1.00	94%
	584- SubT	Misc- Install or replace warning signs	40	160	75%

QAQC Additional Maintenance Code Trends

Region	QAQC added MCodes	MCode Description	QTY	Total Sample Size Audited YTD	Compliance Percent
56	118-Dist	Pole stencil/ correction required	13		98%
	153-Dist	Transformer LA blown, missing/improper	10	589	98%
	221-Dist	Guy – Not in compliance with NESC Code	17		98%
57	221-Dist	Guy – Not in compliance with NESC Code	23	687	97%
60	132-Dist	I7-Alluminum Dead-end	11		99%
	157-Dist	Improper/Missing Bond	12	1432	99%
	221-Dist	Guy – Not in compliance with NESC Code	29		98%
62	118-Dist	Pole stencil/ correction required	17		99%
	157-Dist	Improper/Missing Bond	11	1290	99%
	212-Dist	Ground guard required	10	1389	99%
	221-Dist	Guy wire not in compliance with code (NESC)	24		98%
	526- Trans	Wood Pecker Damage	12	80	85%

QAQC Additional Maintenance Code Trends

<u> I&M Results – Repairs</u>

Per the Safety Standards, the QA/QC program is responsible to verify permanent repairs have been made in response to field force operations inspections performed, along with the timeliness of the repair. The 2015 field force inspection process yielded the following asset deficiencies and repair activities for I&M defined Level 1, Level 2, and Level 3 priorities:

Summary of Deficiencies and Re	onair Activity	, Doculting from	the Inspection Process
Summary of Denciencies and K	еран Аснуцу	Kesulung nom	the inspection i rocess

Year 2015		y Level / Expected	Deficiencies Found (Total)	Repaired Within Required Time Frame	Repaired Past Required Due Date	Not Repaired and Not Due	Not Repaired – Overdue
	Ι	Within 1 week	904	840	49	0	15
	II	Within 1 year	13014	2495	0	10519	0
	III	Within 3 years	63350	858	0	62492	0
	IV	N/A	198304	62403	0	135901	0
	Temp Repairs	Within 90 days	195	163	4	15	13

The QA/QC group performed 446 Level 1 only follow-up field audits and validated that the 433 repairs were completed within the required time frame and 13 Level 1 have not been repaired and are overdue.

Elevated Voltage (EV) Assets Audited

The National Grid QA/QC 2015 EV Field Audit program targeted an overall minimum confidence level of 95% applicable to field force operations inspection of its Distribution, Underground, Transmission and Sub-Transmission assets. Additionally, a minimum confidence level of 98% should be realized for tested streetlights and traffic controls. The inspection process requires elevated voltage testing be conducted for each utility asset that is capable of conducting electricity and is publicly accessible. For each QA/QC EV audit to have successfully "passed," the following test parameters must be validated:

- The voltage recording shall be below established regulatory thresholds (\leq 1volt or mitigated)
- All assets having a "testable object" were in fact tested by the field Inspector.

EV Risks Identified

The analysis of the QA/QC EV Program data is intended to identify the nature and magnitude of Risk 1 and 2 as applicable to the EV Program results.

Electric QA/QC EV Risk Level Definitions
QA/QC program methodology involved performing an additional QA/QC audit of randomly-selected assets having been previously tested by field inspector. For the QA/QC test to have "passed," it must confirm that all assets having a "testable object" were in fact tested.
<u>Risk 1</u>
 An elevated voltage reading was identified by the EV field tester and the independent QA/QC audit found the voltage not mitigated below regulatory/company thresholds after the forty-five (45) days. The QA/QC inspector measured a voltage that exceeds the regulatory/company thresholds greater than or equal to <u>1 volt</u>.
<u>Risk 2</u>
• The EV field tester determined there was not a testable object, and the independent QA/QC auditor identifies a testable component existed at the audited asset.
• The EV field tester determined there was in fact a testable component and the independent QA/QC auditor revealed no testable component at the audited asset.
Risk 3
• The EV field tester and or the independent QA/QC field auditor deem the structure inaccessible or non testable.
• The independent QA/QC field auditor determines a data quality issue.
• Reasonable effort to effectively eliminate the stray voltage condition on overhead Sub-Transmission or Transmission structures was attempted but it some cases cannot achieve a reading of 1 volt or less after mitigation due to neutral currents and induced voltages.

2015 QAQC EV Field Asset Audit Results

The QA/QC group audited <u>6,704</u> elevated voltage assets for distribution, transmission and sub-transmission during eight operating regions.

QA/QC E	V Assets Audited
Region	QA/QC Assets Audit Totals
48	1,327
50	778
51	1,005
54	787
56	506
57	579
60	765
62	957
Total	6,704

Total QA/QC EV Asset Audit	s Totals by Category Type
----------------------------	---------------------------

<u>Category</u> <u>Type</u>	Region 48	Region 50	Region 51	Region 54	Region 56	Region 57	Region 60	Region 62	<u>Totals</u>
								-	
Distribution	650	594	614	595	345	391	446	573	4,208
Underground	5	0	16	0	0	4	0	62	87
Sub Trans	81	58	110	51	79	10	48	54	491
Transmission	70	57	25	12	45	45	13	26	293
Streetlights	521	69	240	129	37	129	258	242	1,625
Totals	1,327	778	1,005	787	506	579	765	957	6,704

2015 QAQC EV Field Asset Audit Results – Risk Level

Risk Level 1 Identified

The National Grid 2015 QA/QC EV audits achieved an overall confidence level of **100%** for Risk 1 level for distribution, underground, transmission and sub-transmission assets.

Additionally, an overall confidence level of **100%** for Risk 1 Level was achieved for the electric QA/QC EV streetlight/ traffic control audits.

<u>Category</u> <u>Type</u>	Region 48	Region 50	Region 51	Region 54	Region 56	Region 57	Region 60	Region 62	<u>Total</u>
Distribution	0	0	0	0	0	0	0	0	0
Underground	0	0	0	0	0	0	0	0	0
Sub Trans	0	0	0	0	0	0	0	0	0
Transmission	0	0	0	0	0	0	0	0	0
Streetlights	0	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0	0

QA/QC Risk 1 Level Identified

Risk Level 2 Identified

A total of 540 QA/QC EV audits (approximately 12% of 6,704 audits performed) resulted in Risk Level 2 being identified. The National Grid 2015 QA/QC EV audits achieved an overall confidence level of **92%** accuracy of identification of testable components.

<u>Category</u> <u>Type</u>	Region 48	Region 50	Region 51	Region 54	Region 56	Region 57	Region 60	Region 62	<u>Total</u>
Distribution	139	60	25	35	5	16	26	20	326
Underground	0	0	0	0	0	0	0	0	0
Sub Trans	8	24	12	3	3	0	9	1	60
Transmission	4	1	10	0	0	2	0	0	17
Streetlights	107	3	8	1	0	0	0	18	137
Totals	258	88	55	39	8	18	35	39	540

QA/QC Risk Level 2 Identified

QA/QC EV Audit Analysis - Risk Level 1 & 2

Region	Dist,	UG, Sub'	Γ, Trans	Compliance Percent	Electric QAQC Additional Analysis Required	Operations Corrective Action Required
	Risk 1	Risk 2	Assets Audited		>90% and ≤95%	<90%
48	0	151	1,327	89%		Х
50	0	85	778	89%		Х
51	0	47	1,005	95%	Х	
54	0	38	787	95%	Х	
56	0	8	506	98%		
57	0	18	579	97%		
60	0	35	765	95%	Х	
62	0	21	957	98%		

(1) Category Type: Distribution, Underground, Sub-Transmission & Transmission

Note: In regions where QA/QC field audits validated the minimum confidence level to have been met or exceeded, no additional analysis or corrective action is required (N/A).

- If the validation accuracy range is 90% to 95% (Distribution, Underground, Sub-Transmission & Transmission), the electric QA/QC group will conduct further analysis of accrued data for potential trending. Operations will be responsible for corrective action where applicable.
- If the validation accuracy is less than 90% (Distribution, Underground, Sub-Transmission & Transmission), Operations is responsible for further trending analysis and/or corrective action and implantation plan to improve field force inspections.

Regions	Street Lights & Traffic Controls		Compliance Percent	Electric QAQC Additional Analysis Required	Operations Corrective Action Required	
			Total Samp le Size Audit			
	Risk 1	Risk 2	ed		>95% and ≤98%	<98%
48	0	1	521	99%		
50	0	3	69	96%		
51	0	8	240	97%		
54	0	1	129	99%		
56	0	0	37	100%		
57	0	0	129	100%		
60	0	0	258	100%		
62	0	18	242	94%	Х	

(2) Category Type: Streetlights & Traffic Controls

Note: In regions where QA/QC field audits validated the minimum confidence level to have been met or exceeded, no additional analysis or corrective action is required (N/A).

- If the validation accuracy range is 95% to 98% (Street Lights & Traffic Controls), the electric QA/QC group will conduct further analysis of accrued data for potential trending. Operations will be responsible for corrective action, where applicable.
- If the validation accuracy is less than 95% (Street Lights & Traffic Controls), Operations is responsible for further trending analysis and/or corrective action and implantation plan to improve field force inspections

Summary

QA/QC I&M Audit Program

The National Grid QA/QC analysis of the additional maintenance codes missed (defects) conducted in 2015 by the National Grid QAQC team concluded the following:

Sub-transmission

Maintenance Code 584 (Install/Replace Warning Sign) and MCode 591 (Misc – Distribution Under built), was missed repetitively across the NY territory. QA/QC discovered 85 errors applicable to maintenance Code 584.

Transmission

Maintenance Code 526 (Wood Pecker Damage) QA/QC discovered 12 errors applicable to maintenance Code 526.

Action item:

The Electric QA/QC and Electric Operations conducted further analysis of the data file and additional investigation into identification of deficiency causal factors. Corrective actions have been assigned to the appropriate regional Inspection groups.

QA/QC EV Program

No Risk Level 1 deficiencies for Distribution, Underground, Sub transmission & Transmission were identified through the QA/QC audit process. Based upon the compliance percentage of QAQC inspection program findings (100% accuracy), further analysis of the accrued QAQC EV inspection data is not warranted.

Action Item: NA

Streetlight EV Data Quality Deficiencies (Risk 3):

A total of 106 audits resulted in a data quality problem being realized. The issue involved the EV field inspector having determined that a non-testable object was identified as testable object. In each of these instances the follow-up QA/QC Field auditor verified the asset was a non testable object (Fiberglass/Composite Streetlight Standard).

Action Item: The QA/QC group has submitted corrective actions to the inspection group to address the non conformances and also have implemented steps to avoid recurrence.

APPENDIX SUMMARY

Appendix 1: Stray Voltage Testing Summary

Appendix 2: Summary of Energized Objects

Appendix 3: Summary of Shock Reports from the Public

Appendix 4: Summary of Deficiencies and Repair Activity Resulting from the Inspection Process

Appendix 5: Temporary Repair Exceptions

Appendix 6: Inspections Summary

Appendix 7: Summary of Overdue Repairs

Appendix 8: Mobile Testing

Appendix 9: NG-USA EOP G016 Elevated Equipment Voltage Testing

Appendix 10: NG-USA EOP D004 Distribution Line Patrol and Maintenance

Appendix 11: NG-USA EOP UG006 Underground Inspection and Maintenance

Appendix 12: NG-USA PR 06.01.601.001 Transmission Line Maintenance Procedure

Appendix 13: NG-USA EOP G017 Street Light Standard Inspection Program

Appendix 14: NG-USA EOP G004 Shock Complaints

Appendix 15: NG-USA SMS 400.06.1 Substation V&O Inspection Standard and SMP 400.06.2 Substation Inspection Procedure

Appendix 16: NG-USA EOP G029 Tracking Temporary Repairs To Electric System

Appendix 17: Certifications

Stray Voltage Testing Summary

Stray Voltage Testing Summary

National grid	Total System Units	Units	Percent	Units with Voltage	Percent of Units Tested with Voltage	Units Classified as
Data as of December 31, 2015	Requiring Testing	Completed	Completed	Found (>= 1.0v)	(>= 1.0v)	Inaccessible
Distribution Facilities	1,308,890	268,752	20.53%	25	0.009%	2,766
Underground Facilities	28,343	28,343	100.00%		0.000%	543
Street Lights / Traffic Signals	84,814	84,814	100.00%	38	0.045%	541
Substation Fences	908	908	100.00%	3	0.33%	490
Transmission	102,056	22,225	21.78%	20	0.09%	
TOTAL	1,525,011	405,042	26.56%	86	0.02%	4,340

Summary of Energized Objects

national grid		Initial R	eadings		Read	ings After Mitig	gation
	1 - 4.4 V	4.5 - 24.9 V	> 25 V	Total	< 1 V	1 - 4.4 V	> 4.5 V
Distribution Facilities	19	2	4	25	24	1	0
Pole (910)	1	1	1	3	3	0	0
Ground (914)	7	1	0	8	7	1	0
Guy (915)	11	1	2	14	14	0	0
Riser (916)	3	0	0	3	2	1	0
Other	0	0	1	1	1	0	0
Underground Facilities	0	0	0	0	0	0	0
Handhole / Pull box (950)	0	0	0	0	0	0	0
Manhole (951)	0	0	0	0	0	0	0
Padmount Switchgear (952)	0	0	0	0	0	0	0
Padmount Transformer (953)	0	0	0	0	0	0	0
Vault – Cover/Door (954)	0	0	0	0	0	0	0
Pedestal	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0
Street Lights / Traffic Signals	21	10	7	38	7	0	0
Metal Street Light Pole (971/981)	20	7	5	32	6	0	0
Traffic Signal Pole (991)	1	3	1	5	0	0	0
Control Box (992)	0	0	1	1	1	0	0
Pedestrian Crossing Pole (993)	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0
Substation Fences	3	0	0	3	3	0	0
Fence (995)	3	0	0	3	3	0	0
Other	0	0	0	0	0	0	0
Transmission	18	2	0	20	20	0	0
Lattice Tower (931)	0	0	0	0	0	0	0
Pole 930)	0(0	0	0	0	0	0
Ground (933)	15	1	0	16	16	0	0
Guy (934)	0	0	0	0	0	0	0
Other	3	1	0	4	4	0	0
Totals	61	14	11	86	85	1	0

Summary of Energized Objects (Manual Testing)

NOTE - National Grid is only mitigating those locations where voltage is confirmed to be 1.0 volts or greater

NOTE - Individual facility counts (pole, ground, guy, etc) may add up to more than the total on a summary line due to voltage on multiple facilities at a single location or pole

NOTE - "Other" category generally includes incorrect facility types reported (example - a pole code turned in for voltage found on an underground device).

Summary of Shock Reports from the Public

Summary of Shock Reports from the Public

	Summary of Shoth Report		
	national grid 2015 1st Quarter January 1, 2015 - March 31, 2015	Quarterly Update	Yearly Total
Ι.	Total shock calls received:	17	17
	Unsubstantiated Normally Energized Equipment Stray Voltage: Person Animal	17	17
II.	Injuries Sustained/Medical Attention Received Due T	o SV	
	Person Animal		
Ш.	Voltage Source:	17	17
	Utility Responsibility Issue with primary, joint, or transformer Secondary joint (Crab) SL service Line Abandoned SL service line Defective service line Abandoned service line OH Secondary OH Service OH Service neutral Pole	1	1 2
	Riser Other Customer Responsibility Contractor damage Customer equipment/wiring Other Utility/Gov't Agency Responsibility SL Base Connection SL Internal wiring or light fixture Overhead equipment	14	14
IV.	Voltage Range:	17	17
	1.0V to 4.4V 4.5V to 24.9V 25V and above Unknown	1 1 15	1 1 15

national grid 2015 2nd Quarter April 1, 2015 - June 30, 2015	Quarterly Update	Yearly Total
I. Total shock calls received:	43	60
Unsubstantiated Normally Energized Equipment Stray Voltage:	10	10
Person Animal	31 2	48 2
II. Injuries Sustained/Medical Attention Received Due	To SV	
Person Animal		
III. Voltage Source:	33	50
Utility Responsibility Issue with primary, joint, or transformer Secondary joint (Crab)	5	6
SL service Line Abandoned SL service line Defective service line Abandoned service line		
OH Secondary	1	1
OH Service	1	1
OH Service neutral Pole Riser	4	6
Other Customer Responsibility	1	1
Contractor damage Customer equipment/wiring Other Utility/Gov't Agency Responsibility SL Base Connection	21	35
SL Internal wiring or light fixture Overhead equipment		
IV. Voltage Range:	33	50
1.0V to 4.4V 4.5V to 24.9V 25V and above	1 4 6	1 5 7
Unknown	22	37

national grid 2015 3rd Quarter July 1, 2015 - September 30, 2	Quarterly Update 015	Yearly Total
I. Total shock calls received:	44	113
Unsubstantiated Normally Energized Equipment Stray Voltage:	74	7 14
Person Animal	33	90 2
II. Injuries Sustained/Medical Attention Red	ceived Due To SV	
Person Animal	2	2
III. Voltage Source:	42	92
Utility Responsibility Issue with primary, joint, or transfor Secondary joint (Crab) SL service Line	mer 2	8
Abandoned SL service line Defective service line Abandoned service line OH Secondary	1	2
OH Service OH Service neutral Pole Riser	3	4 9
Other Customer Responsibility	2	3
Customer Responsibility Contractor damage Customer equipment/wiring Other Utility/Gov't Agency Responsibility SL Base Connection SL Internal wiring or light fixture Overhead equipment	3 27	3 62
IV. Voltage Range:	42	92
1.0V to 4.4V 4.5V to 24.9V 25V and above Unknown	4 2 7 29	5 7 14 66

national grid 2015 4th Quarter October 1, 2015 - December 31, 2015	Quarterly Update	Yearly Total
I. Total shock calls received:	32	145
Unsubstantiated Normally Energized Equipment Stray Voltage:	5 6	12 20
Person Animal	21	111 2
II. Injuries Sustained/Medical Attention Received Due T	o SV	
Person Animal	1	3
III. Voltage Source:	21	113
Utility Responsibility Issue with primary, joint, or transformer Secondary joint (Crab) SL service Line Abandoned SL service line	1	9 1
Defective service line Abandoned service line OH Secondary OH Service OH Service neutral Pole	1 2 1	3 6 10
Riser Other Customer Responsibility		3
Contractor damage Customer equipment/wiring Other Utility/Gov't Agency Responsibility SL Base Connection SL Internal wiring or light fixture Overhead equipment	16	3 78
IV. Voltage Range:	21	113
1.0V to 4.4V 4.5V to 24.9V 25V and above Unknown	1 5 15	6 7 19 81

Summary of Deficiencies and Repair Activity Resulting from the Inspection Process

Summary of Deficiencies and Repair Activity Resulting from the Inspection Process

Detail of Deficiencies by Facilities		201	1			201	2			201	3			201	14			201	5	
Priority Level	l Within	ll Within	III Within	Temp Repairs Within 90	l Within	ll Within	III Within	Temp Repairs Within 90	l Within	ll Within	III Within	Temp Repairs Within 90	l Within	ll Within	III Within	Temp Repairs Within 90	l Within	ll Within	III Within	Temp Repairs Within 90
Repair Expected	1 week	1 year	3 years	days	1 week	1 year	3 years	days	1 week	1 year	3 years	days	1 week	1 year	3 years	days	1 week	1 year	3 years	days
Overhead Facilities																				
Repaired in Time Frame	366	23671	16210	83	358	29531	21354	170	326	17900	6946	133	408	21114	6971	139	694	2355	843	152
Repaired - Overdue	5	1239	165	7	2	2553	462	12	2	729	0	15	5	1367	0	4	35	0	0	4
Not Repaired - Not Due	0	0	0	0	0	0	0	0	0	0	10819	0	0	0	24791	0	0	9079	59707	13
Not Repaired - Overdue	0	0	27	0	0	57	650	0	0	52	0	1	0	219	0	1	12	0	0	11
Total Overhead Facilities	371	24910	16402	90	360	32141	22466	182	328	18681	17765	149	413	22700	31762	144	741	11434	60550	180
Underground Facilities																				
Repaired in Time Frame	76	1273	286	6	75	1326	154	8	219	642	30	7	124	848	164	13	84	19	1	6
Repaired - Overdue	0	526	6	0	0	419	1	1	6	205	0	3	1	28	0	0	5	0	0	0
Not Repaired - Not Due	0	0	0	0	0	0	0	0	0	0	261	0	0	0	112	0	0	545	104	2
Not Repaired - Overdue	0	0	46	0	0	5	7	0	0	379	0	0	0	112	0	0	3	0	0	0
Total Underground Facilities	76	1799	338	6	75	1750	162	9	225	1226	291	10	125	988	276	13	92	564	105	8
Pad Mount Facilities																				
Repaired in Time Frame	17	300	1	1	26	259	1	1	42	272	0	4	36	429	0	8	47	53	0	0
Repaired - Overdue	0	13	0	0	0	2	0	0	1	21	0	1	0	4	0	0	0	0	0	0
Not Repaired - Not Due	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	382	0	0
Not Repaired - Overdue	0	0	0	0	0	1	0	0	0	43	0	0	0	12	0	0	0	0	0	0
Total Pad Mount Facilities	17	313	1	1	26	262	1	1	43	336	0	5	36	445	0	8	47	435	0	0
Streetlight Facilities																				
Repaired in Time Frame	1	688	11	0	0	403	0	0	0	549	0	0	0	128	0	0	2	0	0	0
Repaired - Overdue	0	14	0	0	8	48	0	0	0	53	0	0	0	1	0	0	7	0	0	0
Not Repaired - Not Due	0	0	0	0	0	0	0	0	0	0	1	0	0	0	18	0	0	214	19	0
Not Repaired - Overdue	0	19	2	0	0	22	1	0	0	33	0	0	0	11	0	0	0	0	0	0
Total Streetlight Facilities	1	721	13	0	8	473	1	0	0	635	1	0	0	140	18	0	9	214	19	0
Transmission Facilities																				
Repaired in Time Frame	24	224	1982	3	21	506	1830	1	13	257	299	0	10	346	190	3	13	68	14	5
Repaired - Overdue	2	108	389	6	2	95	420	2	2	109	0	0	0	75	0	0	2	0	0	0
Not Repaired - Not Due	0	0	0	0	0	0	0	0	0	0	1036	0	0	0	2267	0	0	299	2662	0
Not Repaired - Overdue	0	6	156	3	0	36	829	0	0	40	0	0	0	66	0	0	0	0	0	2
Total Transmission Facilities	26	338	2527	12	23	637	3079	3	15	406	1335	0	10	487	2457	3	15	367	2676	7

Sumi	mary of Deficie	encies and F	Repair Activit	y Resulting	from the Ins	pection Pro	ocess - Level	IV Condito	ns	
Overhead Facilities	201	1	201	12	201	3	201	4	20 ⁻	15
	Number of Conditions Found	Number of Conditions Repaired								
				Overhead Fa	cilities					
Pole Condition										
Pole Condition	26342	16905	38697	26656	45514	27252	56517	34487	53515	36304
Grounding System	12666	0	31825	4	35172	0	45969	22	10429	1
Anchors/Guy Wire	48642	13223	56924	16883	52733	13552	55710	9250	33072	14306
Cross Arm/Bracing	2103	1	2335	0	1656	0	1285	0	1323	0
Riser	0	0	0	0	1	0	1	0	0	0
Conductors										
Primary Wire/Broken Ties	1044	0	916	0	880	0	0	0	0	0
Secondary Wire	1	0	438	0	1	0	1	0	1	0
Neutral	0	0	0	0	0	0	0	0	0	0
Insulators	9084	1	8502	0	6548	1	5660	0	8338	0
Pole Equipment										
Transformers	24968	29	26794	110	26462	15	22200	3	27914	0
Cutouts	28359	1	35711	2	42126	1	3400	4	382	0
Lightning Arrestors	2818	0	2741	1	2441	0	3149	0	3731	0
Other Equipment	370	0	411	1	382	1	359	0	619	0
Miscellaneous										
Trimming Related	1669	1285	2045	1816	2227	399	3007	14	1528	0
Other	46	0	57	0	14	0	69	14	77	3
Overhead Facilities Total	158112	31445	207396	45473	216157	41221	197327	43794	140929	50614
	<u> </u>		1	ransmission I	acilities					
Towers/Poles										
Steel Towers	199	0	316	0	144	2	777	49	1486	0
Poles	3499	11	2744	3	2923	2	1950	0	3314	1
Anchors/Guy Wire	224	213	737	447	921	603	742	397	1156	686
Crossarm/Brace	0	0	0	0	0	0	0	0	0	0
Grounding System	43	0	40	0	17	0	1071	0	451	0
Conductors							-			-
Cable	9	0	37	0	46	0	25	1	25	0
Static/Neutral	0	0	2	0	0	0	0	0	0	0
Insulators	138	0	249	0	159	0	160	0	220	0
Miscellaneous										
Right of Way Condition	377	0	382	6	558	34	314	25	276	1
Other	7924	2962	11350	3685	13454	5752	13779	3329	21020	4142
Transmission Facilities Total	12413	3186	15857	4141	18222	6393	18818	3801	27948	4830

				Underground F	acilities					
Underground Structures										
Damaged Cover	10	0	7	0	5	1	19	0	5	0
Damaged Structure	226	63	321	102	272	83	727	61	389	35
Congested Structure	0	0	0	0	0	0	0	0	0	0
Damaged Equipment	124	4	143	3	235	1	211	0	223	0
Conductors										
Primary Cable	2	2	1	1						
Secondary Cable	11	11	4	4	2	2	0	0	0	0
Neutral Cable	0	0	0	0	0	0	0	0	0	0
Racking Needed	23	23	6	6	4	4	1	0	0	0
Miscellaneous										
Other	5644	1937	4162	1050	6932	1515	7627	1922	8204	2727
Underground Facilities Total	6040	2040	4644	1166	7450	1606	8585	1983	8821	2762
			P	ad Mount Tran	sformers					
Underground Structures										
Damaged Structure	3036	2197	2148	1649	2189	788	1712	666	1892	678
Damaged Equipment	0	0	0	0	0	0	0	0	0	0
Damaged Cable	0	0	0	0	0	0	0	0	0	0
Oil Leak	0	0	0	0	0	0	1	0	1	0
Off Pad	0	0	0	0	0	0	0	0	0	0
Lock/Latch/Penta	0	0	0	0	0	0	0	0	0	0
Miscellaneous										
Other	5824	4822	3767	2869	4534	2544	4409	2888	5132	3519
Pad Mount Transformer Total	8860	7019	5915			3332	6122	3554	7025	4197
				Streetligh	nts					
Streetlight										
Base/Standard/Light	6996	3	6105	5	4465	0	5195	4	6954	0
Handhole/Service Box	0	0	0	0	0	0	0	0	0	0
Service/Internal Wiring	4696	2	393	1	866	0	983	2	4146	0
Access Cover	11142	1	1271	0	2116	0	1522	2	1834	0
Miscellaneous										
Other	260	0	222	0	52	0	283	1	142	0
Streetlight Total	23094	6	7991	6	7499	0	7983	9	13076	0
			Т	otal Level IV C	onditions					
Overall Total	208,519	43,696	241,803	55,304	256,051	52,552	238,835	53,141	197,799	62,403

	Summar	y of Deficienci	es and Repair /	Activity Resultin	ig from the Insp	ection Process	;
Year		y Level / Expected	Deficiencies Found (Total)	Repaired In Time Frame	Repaired - Overdue	Not Repaired - Not Due	Not Repaired - Overdue
2011	•	•					
		Within 1 week	491	484	7	0	0
	II	Within 1 year	28081	26156	1900	0	25
		Within 3 years	19281	18490	560	0	231
	IV	N/A	208519	43696	0	164823	0
	Temp Repairs	Within 90 days	109	93	13		3
2012							
		Within 1 week	492	480	12	0	0
		Within 1 year	35263	32025	3117	0	121
		Within 3 years	25709	23339	883	0	1487
	IV	N/A	241803	55304	0	186499	0
	Temp Repairs	Within 90 days	195	180	15	0	0
2013							
	l	Within 1 week	611	600	11	0	0
	II	Within 1 year	21284	19620	1117	0	547
		Within 3 years	19392	7275	0	12117	0
	IV	N/A	256054	52552	0	203502	0
	Temp Repairs	Within 90 days	164	144	19	0	1
2014							
	I	Within 1 week	584	578	6	0	0
	II	Within 1 year	24760	22865	1475	0	420
		Within 3 years	34513	7325	0	27188	0
	IV	N/A	238835	53141	0	185694	0
	Temp Repairs	Within 90 days	168	163	4	0	1
2015							
	I	Within 1 week	904	840	49	0	15
	II	Within 1 year	13014	2495	0	10519	0
	III	Within 3 years	63350	858	0	62492	0
	IV	N/A	198304	62403	0		0
	Temp Repairs	Within 90 days	195	163	4	15	13

Temporary Repair Exceptions

Temporary Repair Exceptions

National Grid has 8 temporary repair exceptions to report.

Distribution

Feeder#	Line#	Pole#	Location	Region	Op District	Date Inspected	Comments	Maint Code	Priority	Comments	Work Order#	Quantity
26553	7	93	/scotch ridge rd	60	32 04/08/20	15 9:41	223		9		19209253	1
13451	86	5-3	KRUTZ LN	62 35		06/25/2015 9:42		127	9	1		
9263	8	24	EAGLE HARBOR RD	50 06		07/02/2015 10:46	heavy vegetation on pole	128 9		leaning	1	
9263	10	27-1	HEMLOCK RIDGE RD	50 06		08/04/2015 9:02		116	9	1		
0461	4	22	DUTCH HILL (OFF ROAD)	51 10		09/01/2015 11:57	UNABLE TO DO PROPER HAMMER TEST AS SURROUNDED BY HEAVY MULTIFLORAL & VEGETATION VISUAL FROM APPROXIMATELY 4FT AWAY ACTUALLY LEVEL 2	120 9		POOR CONDITIO N	1	
7656	34	10977	W SHELBY RD	50 06		09/15/2015 9:16	crossarm is being used to raise service wire over road. Lower bolt is missing nut and pulling out. Upper bolt is loose	123 9		lower bolt loose	1	
42752	125	66-2	County Hwy 28	60 33		10/01/2015 10:25	Pole is currently tied off to trees for support	111 9		Hollow below grade	1	

Transmission

Circuit	Structure#	Region	District	Location	Structure	Date	Maint	Priority	Quantity	Comments	Circuit Name	Work
ID#					Туре	Inspected	Code					Order#
T5580	112	60 99		BETWEE	H- 05/14/20	15	514 9		1	CROSSARMS CUT	4 Riverside to Reynolds (T5580)	
				Ν		9:12				SHORT OF POLE	,	
				STERLIN						AND BEING HELD		
				G RIDGE						BY MECHANICAL		
				+ -90						DEVICE.		
										NOT PROPER		

				ATTACHMEN	

Inspections Summary

2015 PSC QTR 4 REPORT

NATIONAL GRID		2015	2016	2017	2018	2019		
2015- 2019	Total	Units	Units	Units	Units	Units	2015-2019	2015-2019
Inspection Summary	System Units	Completed	Completed	Completed	Completed	Completed	Units Completed	Percent Completed
Distribution - Unique Inspections	1,238,964	255,736					255,736	20.64%
Distribution - Total Inspections	0	256,914					256,914	n/a
	00.000	17.05.4					17.054	
Underground Facilities - Unique	93,698						17,254	
Underground Facilities - Total	0	17,956					17,956	n/a
URD - Unique Inspections	66,262	12,268					12,268	18.51%
URD -Total Inspections	0	12,295					12,295	
Street Light / Traffic Sig - Unique	65,838	12,664					12,664	19.24%
Street Light / Traffic Sig - Total	0	12,702					12,702	n/a
	100.101							
Transmission - Unique Inspections	103,181						22,679	21.98%
Transmission - Total Inspections	0	22,957					22,957	n/a
Grand Total - Unique Inspections	1,567,943	320,601					320,601	20.45%

Summary of Overdue Repairs

Summary of Overdue Repairs for Level II Repairs

		N		aired ays Overdu	le	N		epaired ays Overdu	le	
Year	Facilities	1-30	31-90	91-180	>180	1-30	31-90	91-180	>180	Comments
2011	Distribution									
	Transmission									
	Subtransmission				2				8	Not Repaired: 8 Items
	Underground									
	Pad-mounts									
	Streetlights									
2012	Distribution								57	Not Repaired: 57 Items
	Transmission								3	Not Repaired: 3 Items
	Subtransmission								33	Not Repaired: 33 Items
	Underground								3	Not Repaired: 3 Items
	Pad-mounts									
	Streetlights									
2013	Distribution								52	Not Repaired: 52 Items
	Transmission								16	Not Repaired: 16 Items
	Subtransmission				6				28	Not Repaired: 28 Items
	Underground				45				374	Not Repaired: 374 Items
	Pad-mounts									
	Streetlights									
2014	Distribution	60	1				4	12	203	Not Repaired: 219 Items
	Transmission		13	6			2	51	1	Not Repaired: 54 Items
	Subtransmission				7		14		5	Not Repaired: 19 Items
	Underground		1	1			15	30	67	Not Repaired: 112 Items
	Pad-mounts									
	Streetlights									
2015	Distribution									
	Transmission									
	Subtransmission									
	Underground									
	Pad-mounts									
	Streetlights									

Summary of Overdue Repairs for Level III Repairs

		Nu	Repa umber of D	aired ays Overdı	le	N	Not Re umber of D		le	
Year	Facilities	1-30	31-90	91-180	>180	1-30	31-90	91-180	>180	Comments
2011	Distribution				2				27	Not Repaired: 27 Items
	Transmission				4				4	Not Repaired: 4 Items
	Sub Transmission								166	Not Repaired:166 Items
	Underground								45	Not Repaired: 45 Items
	Pad-mounts									
	Streetlights									
2012	Distribution	50	140	2		3	406	52	184	Not Repaired: 645 Items
	Transmission							76	351	Not Repaired: 427 Items
	Sub Transmission					22		151	243	Not Repaired: 416 Items
	Underground					2		1	1	Not Repaired: 4 Items
	Pad-mounts									
	Streetlights									
2013	Distribution									
	Transmission									
	Sub Transmission									
	Underground									
	Pad-mounts									
	Streetlights									
2014	Distribution									
	Transmission									
	Sub Transmission									
	Underground									
	Pad-mounts									
	Streetlights									
2015	Distribution									
	Transmission									
	Sub Transmission									
	Underground									
	Pad-mounts									
	Streetlights									

Mobile Testing



Patric R. O'Brien Assistant General Counsel

December 9, 2015

VIA ELECTRONIC FILING

Honorable Kathleen H. Burgess Secretary New York State Public Service Commission Three Empire State Plaza Albany, New York 12223-1350

Re: Case 10-E-0271 – In the Matter of Examining the Mobile Testing Requirements of the Electric Safety Standards

Dear Secretary Burgess:

Niagara Mohawk Power Corporation d/b/a National Grid ("Niagara Mohawk") submits for filing its 2015 Mobile Stray Voltage Testing Report pursuant to the Commission's *Orders Requiring Additional Mobile Stray Voltage Testing*, issued July 21, 2010 and June 23, 2011 in the above proceeding. The report details the results of Niagara Mohawk's mobile testing in the cities of Buffalo, Niagara Falls, and Albany during 2015.

Should you have any questions or concerns, please do not hesitate to contact me. Thank you for your time and attention.

Respectfully submitted,

/s/Patric R. O'Brien

Patric R. O'Brien

national**grid**

2015 Mobile Stray Voltage Testing Report December 9, 2015

A <u>Background</u>

Niagara Mohawk Power Corporation d/b/a National Grid ("Niagara Mohawk" or "Company") submits its 2015 Mobile Stray Voltage Testing Report ("Report") pursuant to the Public Service Commission's *Order Adopting Changes to Electric Safety Standards* issued December 15, 2008 in Case 04-M-0159 and *Orders Requiring Additional Mobile Stray Voltage Testing*, issued July 21, 2010 and June 23, 2011 in Case 10-E-0271 (collectively, the "Orders"). In compliance with the Commission's Orders, Niagara Mohawk's 2015 mobile testing consisted of one mobile scan in Albany and Niagara Falls and two mobile scans in Buffalo. The results of the mobile scans are detailed in the tables below.

Niagara Mohawk utilized Power Survey LLC ("Power Survey") to conduct the mobile scans. Niagara Mohawk also utilized Power Survey to perform the mobile scans in 2009 through 2014.

B. <u>Mobile Testing Verification Process</u>

Niagara Mohawk verifies a stray voltage finding made by the mobile scan by using its own internal testing verification procedure as outlined in Section V of the Company's Electric Operating Procedure NG-USA EOP G016. Verification entails using an HD probe to test all metallic objects in the area using a ground reference point as close as practical to the facility being tested up to 25 feet. In the event a suitable ground source cannot be located within the 25 foot range, the Company employs Power Survey's verification procedure, which allows for using a ground reference point of within 100 feet of the structure.

C. <u>Mobile Testing Results by City</u>

1. Albany

Testing began in Albany on October 26, 2015 and was completed on October 29, 2015 with the following results:

- a. Total stray voltage findings = 116
- b. Stray voltage findings at 4.4v and below = 88 (76%)
- c. Stray voltage findings at 4.5v and above = 28 (24%)
- d. Miles scanned = 229
- e. Niagara Mohawk structures scanned = 4,695

			Ev	ents/Hits							
	2009	2010	2011	2012	2013	2014	2015				
Albany	101	217	148	168	106	127	116				
97% of events in 2015 were found on streetlights											

2. Niagara Falls

Testing began in Niagara Falls on May 21, 2014 and was completed on May 22, 2015 with the following results:

- a. Total stray voltage findings = 53
- b. Stray voltage findings at 4.4v and below = 48 (91%)
- c. Stray voltage findings at 4.5v and above = 5(9%)
- d. Miles scanned = 43
- e. Niagara Mohawk structures scanned = 1,317

			E	vents/Hits								
2009 2010 2011 2012 2013 2014 2015												
Niagara				15	12	13	53					
Falls												
	100% of events in 2015 were found on streetlights											

3. Buffalo

Niagara Mohawk conducted two separate mobile scans of Buffalo in 2015. The first mobile scan began on May 4, 2015 and was completed on June 11, 2015 with the following results:

- a. Total stray voltage findings = 471
- b. Stray voltage findings at 4.4v and below = 399 (85%)
- c. Stray voltage findings at 4.5v and above = 72 (15%)
- d. Miles scanned = 1,466
- e. Niagara Mohawk structures scanned = 27,831

The second mobile scan began on September 14, 2015 and was completed on October 21, 2015 with the following results:

- a. Total stray voltage findings = 605
- b. Stray voltage findings at 4.4v and below = 514 (85%)
- c. Stray voltage findings at 4.5v and above = 91 (15%)
- d. Miles scanned = $1,423^1$
- e. Niagara Mohawk structures scanned $= 27,781^2$

	Events/Hits												
		2010-	2010-	2011-	2011-	2012-	2012-	2013-	2013-	2014-	2014-	2015-	2015-
	Scan Scan Scan Scan Scan Scan Scan Scan												
	2009	1	2	1	2	1	2	1	2	1	2	1	2
Buffalo	2,678	931	837	714	566	316	260	345	570	450	293	471	605
	Approx 92% of events were found on streetlights (2015 Scans 1 & 2)												

¹ Variances in mileages are directly attributable to the same crews performing both scans and optimizing their routes during the second scan resulting in less overlap.

 $^{^{2}}$ Variances in scanned structures are attributable to unscannable assets due to inaccessible roadways due to construction, road blocks, and private roads.

A majority of the 2015 findings were below 4.5v in Albany (76%), Niagara Falls (91%), and Buffalo (85% in Scan 1 and 85% in Scan 2).

D. <u>Mobile Testing Repair/Mitigation Efforts</u>

As of November 20, 2015, Niagara Mohawk has completed 69% of the total permanent repairs in Buffalo (Scan 1 & Scan 2), Niagara Falls, and Albany.

A summary table illustrating repair status by region can be found in Appendices A-E. These tables are updated as of November 20, 2015.

E. <u>Mobile Testing Program Costs</u>

City	Actual Miles	Events Found	Event Rate	Repairs	Mobile Inspection Cost
Buffalo Scan 1	1,466	471	0.32	471	\$2,031,480
Buffalo Scan 2	1,423	605	0.43	252	\$2,051,400
Niagara Falls	43	53	1.23	53	\$39,367
Albany	229	116	0.51	2	\$68,846
Total	3,161	1,245		778	\$2,144,510

As of November 23, 2015, the mobile scan surveys totaled \$2,144,510.

F. <u>Mobile and Manual Testing Program Comparison</u>

It cost the Company on average 9 times more to conduct mobile testing (per mile cost) when compared to manual testing (per unit cost) in Albany, Niagara Falls, and Buffalo in 2015.

	Albany		Niagar	a Falls	Buffalo Scan 1 & 2	
2015 Estimated Costs	Manual ³	Mobile	Manual	Mobile	Manual	Mobile
Non-Streetlighting Eqp.	\$10,022		\$2,397		\$58,179	
Metallic Streetlighting		\$68,846		\$39,367		\$2,031,480
Eqp.	\$2,939		\$1,260		\$18,712	
Delta	Δ \$55	5,885	Δ \$3	5,710	Δ\$1,	954,589

³ The estimated manual testing costs are based on the per unit cost of conducting a manual elevated voltage test in Albany, Niagara Falls, and Buffalo and the number of facilities scanned during mobile testing in 2015. The numbers reflect what it would have cost the Company had it performed manual testing in these cities in 2015.

Appendix A Mobile Testing & Repair Summary

	eport 2015				
11/20/2015					
Testing Summers	Buffalo Scan 1	Buffalo Scan 2	N. Falls	Albany	Grand Total
Testing Summary	474	005	50	110	4 245
Total Number of Events	471	605	53	116	1,245
At or Above 4.5 Volts	72	91	5	28	196
Between 1.0 and 4.4 Volts	399	514	48	88	1,049
Total NGRID Owned Events (streetlights)	471	605	52	116	1 245
At or Above 4.5 Volts	471	91	53	28	1,245 196
			5		
Between 1.0 and 4.4 Volts	399	514	48	88	1,049
Total Private Owned Events	34	15	0	0	49
At or Above 4.5 Volts	19	6	0	0	25
Between 1.0 and 4.4 Volts	19	9	0	0	23
	15	9	0	0	24
Survey Percent Complete by City					
Buffalo (Scan 1)	1466				100.00%
Buffalo (Scan 2)	1100	1423			100.00%
Niagara Falls		1120	43		100.00%
Albany				229	100.00%
Total Miles To Be Scanned (estimates)	1,466	1,423	43	229	3,161
	1,400	1,420		220	3,101
NY Stray Voltage Mobile Testing Repair Sumr 11/20/2015	Buffalo Scan 1	Buffalo Scan 2	N. Falls	Albany	Grand Total
Repair Summary	Bullato ocali i	Bullato Scall 2	N. 1 alis	Albally	Grand Total
NGRID Repairs					
Required	471	005			
Completed		000	53	116	1.245
Completed	471	605 344	53 53	116 48	1,245
Pending (All repairs)	471	344	53	48	916
Pending (All repairs) Pending (De-energized streetlights)	0	344 261	53 0	48 68	916 329
Pending (De-energized streetlights)		344	53 0 0	48	916
Pending (De-energized streetlights) Exceeding 45 Days	0 0 0	344 261 42 2	53 0 0 3	48 68 19 0	916 329 61 5
Pending (De-energized streetlights)	0	344 261 42	53 0 0	48 68 19	916 329 61
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete	0 0 0	344 261 42 2	53 0 0 3	48 68 19 0	916 329 61 5
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs	0 0 100.00%	344 261 42 2 56.86%	53 0 0 3 100.00%	48 68 19 0 41.38%	916 329 61 5 73.57%
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete	0 0 100.00%	344 261 42 2 56.86% 7	53 0 0 3 100.00%	48 68 19 0 41.38% 0 0	916 329 61 5 73.57% 19
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs	0 0 0 100.00% 15 15	344 261 42 2 56.86% 7 0	53 0 0 3 100.00% 0 0	48 68 19 0 41.38%	916 329 61 5 73.57% 19 15
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending	0 0 0 100.00% 15 15 0	344 261 42 2 56.86% 7 0 7	53 0 3 100.00% 0 0 0	48 68 19 0 41.38% 0 0 0	916 329 61 5 73.57% 19 15 4
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending TOH Exceeding 90 Days	0 0 0 100.00% 15 15 0 0	344 261 42 2 56.86% 7 0 7 0 7 0 0	53 0 3 100.00% 0 0 0 0 0	48 68 19 0 41.38% 0 0 0 0 0 0	916 329 61 5 73.57% 19 15 4 0
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending TOH Exceeding 90 Days	0 0 100.00% 15 15 15 0 0 100.00%	344 261 42 2 56.86% 7 0 0 7 0 0 0.00%	53 0 3 100.00% 0 0 0 0 0	48 68 19 0 41.38% 0 0 0 0 0 100.00%	916 329 61 5 73.57% 19 15 4 0
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending TOH Exceeding 90 Days TOH Percent Complete Private Repairs Required	0 0 0 100.00% 15 15 0 0	344 261 42 2 56.86% 7 0 0 0.00%	53 0 3 100.00% 0 0 0 0 0	48 68 19 0 41.38% 0 0 0 0 0 0	916 329 61 5 73.57% 19 15 4 0 78.95% 49
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending TOH Exceeding 90 Days TOH Percent Complete Private Repairs Required Completed	0 0 100.00% 15 15 15 0 0 100.00%	344 261 42 56.86% 7 0 0 0.00%	53 0 3 100.00% 0 0 0 100.00%	48 68 19 0 41.38% 0 0 0 0 0 100.00%	916 329 61 5 73.57% 19 15 15 4 0 78.95%
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending TOH Exceeding 90 Days TOH Percent Complete Private Repairs Required	0 0 100.00% 15 15 15 0 0 100.00%	344 261 42 2 56.86% 7 0 0 0.00%	53 0 0 3 100.00% 0 0 0 100.00%	48 68 19 0 41.38% 0 0 0 0 100.00%	916 329 61 5 73.57% 19 15 4 0 78.95% 49 49
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending TOH Exceeding 90 Days TOH Percent Complete Private Repairs Required Completed	0 0 0 100.00% 15 15 15 0 0 0 0 100.00%	344 261 42 56.86% 7 0 0 0.00%	53 0 0 3 100.00% 0 0 0 0 100.00%	48 68 19 0 41.38% 0 0 0 0 0 100.00%	916 329 61 5 73.57% 19 15 4 0 78.95% 49 49 0 0 0 0 0
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending TOH Exceeding 90 Days TOH Percent Complete Private Repairs Required Completed Pending	0 0 0 100.00% 15 15 0 0 0 0 100.00% 34 34 34	344 261 42 2 56.86% 7 0 0 0 0.00% 15 15 0 0	53 0 0 3 100.00% 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	48 68 19 0 41.38% 0 0 0 0 0 100.00%	916 329 61 5 73.57% 19 15 15 4 0 78.95% 49 49 0 0 0 0 0
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending TOH Exceeding 90 Days TOH Percent Complete Private Repairs Required Completed Pending Exceeding 45 Days	0 0 0 100.00% 15 15 15 0 0 0 0 100.00% 34 34 34 0 0	344 261 42 2 56.86% 7 0 0 0 0.00% 5 5 5 5 0 0 0 0 0 0 0 0 0 0	53 0 0 3 100.00% 0 0 0 0 100.00%	48 68 19 0 41.38% 0 0 0 0 0 100.00%	916 329 61 5 73.57% 19 15 4 0 78.95% 49 49 0 0 0 0 0
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending TOH Exceeding 90 Days TOH Percent Complete Private Repairs Required Completed Pending Exceeding 45 Days Percent Complete Total Repairs Pending	0 0 0 100.00% 15 15 15 0 0 0 0 100.00% 34 34 34 0 0	344 261 42 2 56.86% 7 0 0 0 0.00% 5 5 5 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	53 0 0 3 100.00% 0 0 0 0 100.00%	48 68 19 0 41.38% 0 0 0 0 0 100.00%	916 329 61 5 73.57% 19 15 4 0 78.95% 49 49 49 0 0 0 100.00%
Pending (De-energized streetlights) Exceeding 45 Days Percent Complete TOH Repairs TOH Complete TOH Pending TOH Exceeding 90 Days TOH Percent Complete Private Repairs Required Completed Pending Exceeding 45 Days Percent Complete	0 0 0 100.00% 15 15 15 0 0 0 100.00% 34 34 34 0 0 0 100.00%	344 261 42 2 56.86% 7 0 0 0 0.00% 5 5 5 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	53 0 0 3 100.00% 0 0 0 100.00% 0 100.00%	48 68 19 0 41.38% 0 0 0 0 100.00%	916 329 61 5 73.57% 19 15 4 0 78.95% 49

Appendix B

Summary of Energized Objects - Mobile Testing - City of Niagara Falls

national grid Data as of November 20, 2015		Initial R	eadings		Readings After Mitigation			
	1 - 4.4 V	4.5 - 24.9 V	> 25 V	Total	< 1 V	1 - 4.4 V	> 4.5 V	
Distribution Facilities	0	0	0	0	0	0	0	
Pole (910)	0	0	0	0	0	0	0	
Ground (914)	0	0	0	0	0	0	0	
Guy (915)	0	0	0	0	0	0	0	
Riser (916)	0 0	0 0	0 0	0 0	0 0	0 0	0 0	
Other Underground Facilities	0	0	0	0	0	0	0	
Handhole / Pull box (950)	0	0	0	0	0	0	0	
Manhole (951)	0	0	0	0	0	0	0	
Padmount Switchgear (952)	0	0	0	0	0	0	0	
Padmount Transformer (953)	0	0	0 0	0 0	Ő	0 0	0	
Vault – Cover/Door (954)	0	0	0	0	0	0	0	
Pedestal	0	0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	
Street Lights / Traffic Signals	48	4	1	53	53	0	0	
Metal Street Light Pole (971/981)	48	4	1	53	53	0	0	
Traffic ignal ole 9 \$ 1)	P 0(0	0	0	0	0	0	
Control ox 992)	B 0(0	0	0	0	0	0	
Pedestrian Crossing Pole (993)	0	0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	
Substation Fences	0	0	0	0	0	0	0	
Fence 995)	0(0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	
Transmission Lattice ower 931)	0 T 0(0 0	<mark>0</mark> 0	0 0	0 0	0 0	0 0	
Pole 930)	0(0	0	0	0	0	0	
Ground (933)	0	0	0	0	0	0	0	
Guy (934)	0	0	0	0	0	0	0	
Other	0	0 0	0 0	0 0	0 0	0	0	
Miscellaneous Facilities	0	0	0	0	0	0	0	
Sidewalk	0	0	0	0	0	0	0	
Gate/Fence/Awning*	0	0	0	0	0	0	0	
Control Box	0	0	0	0	0	0	0	
Scaffolding	0	0	0	0	0	0	0	
Bus Shelter	0	0	0	0	0	0	0	
Fire Hydrant	0	0	0	0	0	0	0	
Phone Booth	0	0	0	0	0	0	0	
Water Pipe	0	0	0	0	0	0	0	
Riser	0	0	0	0	0	0	0	
Other**	0 48	0	0	0 53	0 53	0	0	
Totals	40	4		53	53	0	0	

Appendix C

national grid Data as of November 20, 2015		Initial R	eadings	Readings After Mitigation			
	1 - 4.4 V	4.5 - 24.9 V	> 25 V	Total	< 1 V	1 - 4.4 V	> 4.5 V
Distribution Facilities	0	0	0	0	0	0	0
Pole (910)	0	0	0	0	0	0	0
Ground (914)	0	0	0	0	0	0	0
Guy (915)	0	0	0	0	0	0	0
Riser (916)	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0
Underground Facilities	0	0	0	0	0	0	0
Handhole / Pull box (950)	0	0	0	0	0	0	0
Manhole (951)	0	0	0	0	0	0	0
Padmount Switchgear (952)	0	0	0	0	0	0	0
Padmount Transformer (953)	0	0	0	0	0	0	0
Vault – Cover/Door (954)	0	0	0	0	0	0	0
Pedestal	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0
Street Lights / Traffic Signals	87	25	3	115	48	0	0
Metal Street Light Pole (971/981)	86	24	3	113	46	0	0
Traffic ignal ole 9931)	P 1(1	0	2	2	0	0
Control ox 992)	B 0(0	0	0	0	0	0
Pedestrian Crossing Pole (993)	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0
Substation Fences	0	0	0	0	0	0	0
Fence 995)	0(0	0	0	0	0	0
Other	0	0	0	0	0	0	0
Transmission	0	0	0	0	0	0	0
Lattice ower 931)	Т 0(0	0	0	0	0	0
Pole 930)	0(0	0	0	0	0	0
Ground (933)	0	0	0	0	0	0	0
Guy (934)	0 0	0 0	0 0	0 0	0 0	0 0	0 0
Other	0	-	-	-	0	-	-
Miscellaneous Facilities Sidewalk	0	0 0	0 0	1 0	0	0 0	0 0
Gate/Fence/Awning*	0	0	0	0	0	0	0
Control Box	0	0	0	0	0	0	0
Scaffolding	0	0	0	0	0	0	0
Bus Shelter	0	0	0	0	0	0	0
Fire Hydrant	0	0	0	0	0	0	0
Phone Booth	0	0	0	0	0	0	0
Water Pipe	0	0	0	0	0	0	0
Riser	0	0	0	0	0	0	0
Other**	1	0	0	1	0	0	0
Totals	88	25	3	116	48	0	0
i otulo	00	25	5	110	70	U	0

Appendix D

Summary of Energized Objects - Mobile Testing - City of Buffalo Scan 1

nationalgrid Data as of November 20, 2015		Initial R	eadings	Readings After Mitigation			
	1 - 4.4 V	4.5 - 24.9 V	> 25 V	Total	< 1 V	1 - 4.4 V	> 4.5 V
Distribution Facilities	0	0	0	0	0	0	0
Pole (910)		0	0	0	0	0	0
Ground (914)	0	0	0	0	0	0	0
Guy (915)	0	0	0	0	0	0	0
Riser (916)	0 0	0 0	0 0	0	0 0	0 0	0 0
Other Underground Facilities	-	-		-	-	-	÷
Handhole / Pull box (950)	0 0	0 0	0 0	0	0 0	0 0	<mark>0</mark> 0
Manhole (950) Manhole (951)	0	0	0	0	0	0	0
Padmount Switchgear (952)	0	0	0	0	0	0	0
Padmount Transformer (953)	0 0	Ö	Ö	0	Ő	0 0	0
Vault – Cover/Door (954)	0	0	0	0	0	0	0
Pedestal	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0
Street Lights / Traffic Signals	369	61	5	435	435	0	0
Metal Street Light Pole (971/981)		55	4	418	418	0	0
Traffic Signal Pole (991)		6	1	17	17	0	0
Control ox 992)	•	0	0	0	0	0	0
Pedestrian Crossing Pole (993)	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0
Substation Fences	0	0	0	0	0	0	0
Fence 995)	0(0	0	0	0	0	0
Other	0	0	0	0	0	0	0
Transmission	0	0	0 0	0	0	0 0	0
Lattice ower 931) Pole 930)	`	0 0	0	0 0	0 0	0	0 0
Ground (933)	0(0	0	0	0	0	0	0
Gibbild (933) Guy (934)	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0 0
Miscellaneous Facilities	30	6	0	36	35	0	1
Sidewalk		0	0	0	0	0	0
Gate/Fence/Awning*	0	0	0	0	0	0	0
Control Box	0	0	0	0	0	0	0
Scaffolding	0	0	0	0	0	0	0
Bus Shelter	0	1	0	1	1	0	0
Fire Hydrant	0	0	0	0	0	0	0
Phone Booth	0	0	0	0	0	0	0
Water Pipe	0	0	0	0	0	0	0
Riser	0	0	0	0	0	0	0
Other**	30	5	0	35	34	0	1
Totals	399	67	5	471	470	0	1

Appendix E

Summary of Energized Objects - Mobile Testing - City of Buffalo Scan 2

national grid Data as of November 20, 2015		Initial R	eadings		Readings After Mitigation			
	1 - 4.4 V	4.5 - 24.9 V	> 25 V	Total	< 1 V	1 - 4.4 V	> 4.5 V	
Distribution Facilities	0	0	0	0	0	0	0	
Pole (910)	0	0	0	0	0	0	0	
Ground (914)	0	0	0	0	0	0	0	
Guy (915)	0	0	0	0	0	0	0	
Riser (916)	0	0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	
Underground Facilities	0	0	0	0	0	0	0	
Handhole / Pull box (950) Manhole (951)	0 0	0 0	0 0	0 0	0 0	0 0	0 0	
Padmount Switchgear (952)	0	0	0	0	0	0	0	
Padmount Transformer (953)	0	0	0	0	0	0	0	
Vault – Cover/Door (954)	0	0	0	0	0	0	0	
Pedestal	0 0	0 0	Ő	0	0 0	0 0	0	
Other	0 0	0 0	Õ	0 0	0 0	0	0 0	
Street Lights / Traffic Signals	507	83	6	596	338	0	0	
Metal Street Light Pole (971/981)	491	76	6	573	319	0	0	
Traffic Signal Pole (991)	14	7	0	21	17	0	0	
Control ox 992)	B 2(0	0	2	2	0	0	
Pedestrian Crossing Pole (993)	0	0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	
Substation Fences	0	0	0	0	0	0	0	
Fence 995)	0(0	0	0	0	0	0	
Other	0	0	0	0	0	0	0	
Transmission	0	0	0	0	0	0	0	
Lattice ower 931)	```	0	0	0	0	0	0	
Pole 930)	0(0	0	0	0	0	0	
Ground (933)	0 0	0 0	0 0	0 0	0 0	0 0	0 0	
Guy (934) Other	0	0	0	0	0	0	0	
Miscellaneous Facilities	7	2	0	9	6	0	0	
Sidewalk	0	0	0	0	0	0	0	
Gate/Fence/Awning*	0	0	0	0	0	0	0	
Control Box	0 0	0 0	Ő	0 0	Ő	0 0	0	
Scaffolding	0	0	0	0	0	0	0	
Bus Shelter	0	0	0	0	0	0	0	
Fire Hydrant	0	0	0	0	0	0	0	
Phone Booth	0	0	0	0	0	0	0	
Water Pipe	0	0	0	0	0	0	0	
Riser	0	0	0	0	0	0	0	
Other**	7	2	0	9	6	0	0	
Totals	514	85	6	605	344	0	0	

NG-USA EOP G016 Elevated Equipment Voltage Testing

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 1 of 20
1000	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

INTRODUCTION

The purpose of this procedure is to outline the requirements for the annual equipment elevated voltage testing on National Grid Facilities in New York as required by the New York Public Service Commission's "Electric Safety Standards" issued on January 5, 2005, the New York Public Service Commission's "Order Adopting Changes to Electric Safety Standards issued and effective on December 15, 2008, the New York Public Service Commission's "Order Requiring Additional Mobile Stray Voltage Testing" issued and effective on July 21, 2010 and the New York's Public Service Commission "Order Granting Petition In Part and Modifying Electric Safety Standards" issued and effective on March 22, 2013.

This procedure also outlines requirements for equipment elevated voltage testing in Rhode Island and requirements by the Rhode Island Public Utilities Commission in Docket 4237 "Order to Establish a Contact Voltage Detection, Repair and Reporting Program" issued on November 9, 2012, and the subsequent order issued on February 1, 2013.

Additionally the Massachusetts Department of Telecommunications and Energy provided a series of recommendations on December 9, 2005, that have been included in this procedure.

While there are variances in requirements between New York, Massachusetts, and Rhode Island driven by particular regulatory requirements in each State, the minimum requirements are based on sound utility practice.

PURPOSE

This procedure applies to all personnel involved with or responsible for the testing, repair and reporting of facilities designated by this EOP for equipment elevated voltage. It should be noted that the term "Contact Voltage" has been adopted and is used in the EOP (refer to definitions section).

ACCOUNTABILITY

- 1. Standards, Policies and Codes
 - A. Update program as necessary.
 - B. Provide personnel guidance and assistance as requested.
- 2. Inspection s & Maintenance
 - A. Ensure the equipment elevated voltage program as outlined in this EOP is implemented properly and timely.
 - B. Ensure that the program as outlined in the EOP is completed each year.
 - C. Provide qualified personnel to complete equipment elevated voltage testing.
 - D. Ensure all equipment elevated voltage inspectors have been trained.

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3. Equipment Elevated Voltage Inspector

A. Demonstrate the ability and proficiency to perform equipment elevated voltage testing per this EOP.

B. Demonstrate the ability to become proficient in the use of the appropriate database.

C. Possess the ability to do walking patrols, collect information, edit data, and guard unsafe facilit ies.

- D. Attend equipment elevated voltage training program.
- 4. Learning & Development
 - A. Provide training upon request.
- 5. Distribution Network Strategy
 - A. Provide input into program revisions.
 - B. Ensure the equipment elevated voltage program as outlined in this EOP is implemented properly and timely.
 - C. Ensure the program as outlined in the EOP is completed each year.
 - D. Provide qualified personnel to complete equipment elevated voltage testing.
 - E. Ensure all equipment elevated voltage inspectors have been trained.
 - F. Provide program management.

REFERENCES

NYPSC Order 04-M-0159 NYPSC Order Adopting Changes to Electric Safety Standards NYPSC Order Requiring Additional Mobile Stray Voltage Testing RIPUC Docket 4237 Order 20871 (November 9, 2012) and Order 20950 (February 1, 2013) Proposed Rhode Island Electric Contact Voltage Program, Revised October 2, 2012 (Docket 4237) NYSPSC Order Granting Petition in Part and Modifying Electric Safety Standards Applicable National Grid Safety Rules & Procedures Testing Equipment Operation Instructions

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	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 3 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

DEFINITIONS

Contact Voltage (Draft definition as defined by the Working Group of the Institute of Electrical and Electronic Engineers (IEEE)): Voltage resulting from abnormal power system conditions that may be present between two conductive surfaces that can come into contact by members of the general public and/or animals. Contact voltage is caused by power system fault current as it flows through the impedance of available fault current pathways. Contact voltage is not related to normal system operation and can exist at levels that may be hazardous.

Contact Voltage Area (CVA): Designated underground distribution areas within the cities of Providence, Pawtucket, Newport and Woonsocket established in the "proposed Rhode Island Electric Contact Voltage Program", Revised October 2, 2012 (Docket 4237).

Equipment Elevated Voltage: An A.C. rms voltage difference between utility equipment and the earth, or to nearby grounded facilities that exceeds the lowest perceptible voltage levels for humans.

Equipment Elevated Voltage Inspector: The individual performing the equipment elevated voltage inspection.

Finding: Any confirmed voltage reading on an electric facility or streetlight greater than or equal to 1V measured using a volt meter and a 500 ohm shunt resistor.

Handheld Computer: An electronic data recording device that is used in the field to create a record of conditions found.

Mitigation: Corrective actions performed by the utility to address the stray voltage finding.

Proximity Detection Unit: A low voltage hand held detector used to test exposed metallic surfaces and conductors for the presence of low voltage from 6V to 600V.

Shall: The word shall is to be understood as mandatory.

Should: The word should is to be understood as advisory.

Stray Voltage: As defined by NYPSC the term "Stray Voltage" means voltage conditions on electric facilities that should not ordinarily exist.

Stray Voltage Testing: The process of checking an electric facility for stray voltage using a device capable of reliably detecting and audibly and/or visually signaling voltages in the range of 6 to 600 volts.

Total Harmonic Distortion (THD): This term has come into common usage to define either voltage or current "distortion factor."

Distortion Factor (harmonic factor): The ratio of the root-mean-squared of the harmonic content to the root-mean-squared value of the fundamental quantity, expressed as a percent of the fundamental.

$$\mathsf{DF} = \sqrt{\frac{sum_of_squares_of_amplitudes_of_all_harmonics}{square_of_amplitude_of_fundamental}} *100\%$$

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	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 4 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

DOCUMENT CONTENTS

Table of Contents

1.0	FACILITIES WHERE EQUIPMENT ELEVATE VOLTAGE TESTING/DOCUMENTATION IS REQUIRED – NEW YORK	5
2.0	FACILITIES WHERE EQUIPMENT ELEVATED VOLTAGE TESTING/DOCUMENTATION IS REQUIRED – RHODE ISLAND	7
3.0	FACILITIES WHERE EQUIPMENT ELEVATED VOLTAGE TESTING/DOCUMENTATION IS REQUIRED – MASSACHUSETTS	8
4.0	TEST EQUIPMENT	9
5.0	TEST PROCEDURE	. 10
6.0	CORRECTIVE ACTION REQUIREMENTS FOR ELEVATED VOLTAGE FINDINGS	. 12
7.0	DATABASE REQUIREMENTS	. 14
8.0	NEW YORK ANNUAL REPORTING AND CERTIFICATION REQUIREMENTS	. 15
9.0	MASSACHUSETTS REPORTING REQUIREMENTS	. 17
10.0	RHODE ISLAND REPORTING REQUIREMENTS	. 17
11.0	TYPE OF EQUIPMENT - APPENDIX A	. 19
12.0	REVISION HISTORY	.20

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1.0 FACILITIES WHERE EQUIPMENT ELEVATE VOLTAGE TESTING/DOCUMENTATION IS REQUIRED – NEW YORK

- 1.1 Street Lights and Municipally Owned Facilities
 - 1.1.1 Company owned metallic street lighting standards are required to be tested for equipment elevated voltage annually. This test is to be performed while the light is operating.
 - 1.1.2 Municipally owned street light systems that National Grid directly provides energy to shall be tested for equipment elevated voltage annually. National Grid will complete this testing unless assurances of the completion of required testing and transfer of such test data are made by the appropriate municipality. This test is to be performed while the light is operating.
 - 1.1.3 Municipal owned metallic traffic signal standards and accessible devices are to be tested annually for equipment elevated voltage by National Grid.
 - 1.1.4 All street lights identified on public thoroughfares regardless of ownership are to be tested annually.
 - 1.1.5 All street lights under a maintenance contract are to be tested annually. Exceptions not requiring equipment elevated voltage testing: private lighting, park associations, parking lots, fiberglass (or other non-conductive) street light standards, and locations where street light standards are not publicly accessible, such as facilities located in the center of highways that cannot be accessed without stopping traffic or creating potentially hazardous situations for the worker and/or public.
- 1.2 National Grid Substation Fences
 - 1.2.1 Metallic fencing surrounding substations with National Grid Facilities shall be tested for equipment elevated voltage annually. This fencing can be customer owned for customer stations, if a National Grid facility is part of the station.
- 1.3 Overhead Distribution Facilities
 - 1.3.1 Towers and/or metallic poles with distribution facilities shall be tested for equipment elevated voltage at an annual rate of twenty percent (20%) in conjunction with field inspections on a five-year cycle.
 - 1.3.2 The following equipment on wood distribution poles requires equipment elevated voltage testing at an annual rate of twenty percent (20%) in conjunction with field inspections on a five-year cycle:
 - 1. Metallic riser guard or conduit (company or non-company).
 - 2. Uncovered or uninsulated down ground (company or non-company).
 - 3. Down guy (company or non-company).
 - 4. Any other publicly accessible conductive piece of equipment (company or non-company) on the pole within reach from the ground.

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- 1.3.3 Exceptions: Customer meters and customer meter poles are excluded.
- 1.4 Overhead Transmission Facilities
 - 1.4.1 Towers and/or metallic poles with transmission facilities shall be tested for equipment elevated voltage at an annual rate of twenty-percent (20%) in conjunction with field inspections on a five-year cycle.
 - 1.4.2 The following equipment on wood transmission poles or structures require equipment elevated voltage testing at an annual rate of twenty-percent (20%) in conjunction with field inspections on a five-year cycle:
 - a. Metallic riser guard or conduit (company or non-company).
 - b. Uncovered or uninsulated down ground (company or non-company).
 - c. Down guy (company or non-company).
 - d. Any other publicly accessible conductive piece of equipment (company or non-company) on the pole or structure within reach from the ground.

1.5 Underground Facilities

- 1.5.1 Annual equipment elevated voltage testing is required on all of the following equipment where accessible to the public.
 - a. All metallic manhole covers, vault covers and grates, junction box covers, and handhole covers.
- 1.5.2 Pad-mounted transformers and switchgear are tested at an annual rate of twenty percent (20%) in conjunction with field inspections on a five-year cycle.
- 1.5.3 Starting in 2010 and continuing thereafter, unless changed by subsequent order of the NY Public Service Commission, two mobile stray voltage surveys shall be conducted annually in Buffalo and one mobile stray voltage survey is required to be conducted annually in Albany and Niagara Falls.
- 1.5.4 Exceptions: Non-metallic concrete or fiberglass pads or handholes or pull/splice boxes are not required to be tested.
- 1.6 Daily Job Site Test Requirements
 - 1.6.1 Each job site where National Grid personnel or its contractors complete a work assignment shall be tested for equipment elevated voltage at the start and at the end of the work day or at the start or at the completion of the assignment. This testing requirement is considered good utility practice and does not require specific documentation.
 - 1.6.2 Exceptions:
 - a. Substation fencing will not require equipment elevated voltage testing unless scheduled as part of the inspection program or if work was done on the fencing.
 - b. In a storm situation, where mutual aid is required, testing by other than National Grid personnel will not be required.

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	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 7 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

1.7 Exe mptions

1.7.1 A completely fenced in area where access is denied to the general public and where access is only achieved by climbing a fence. Good judgment is required by the tester in these scenarios.

2.0 FACILITIES WHERE EQUIPMENT ELEVATED VOLTAGE TESTING/DOCUMENTATION IS REQUIRED – RHODE ISLAND

- 2.1 Company Owned Street Lights
 - 2.1.1 Company owned metallic street lighting standards are required to be tested for equipment elevated voltage on a three-year cycle.
 - 2.1.2 Exceptions: Testing shall not be completed at locations where street light standards are not publicly accessible, such as facilities located in the center of highways that cannot be accessed without stopping traffic or creating potentially hazardous situations for the worker and/or the public.

2.2 Overhead Distribution Facilities

- 2.2.1 Towers and/or metallic poles with transmission facilities shall be tested for equipment elevated voltage at an annual rate of twenty-percent (20%) in conjunction with field inspections on a five-year cycle..
- 2.2.2 The following equipment on wood transmission poles or structures require equipment elevated voltage testing at an annual rate of twenty-percent (20%) in conjunction with field inspections on a five-year cycle:
 - a. Metallic riser guard or conduit (company or non-company).
 - b. Uncovered or uninsulated down ground (company or non-company).
 - c. Down guy (company or non-company).
 - d. Any other publicly accessible conductive piece of equipment (company or non-company) on the pole or structure within reach from the ground.

2.3 Underground Facilities

- 2.3.1 Testing for equipment elevated voltage shall be done while completing scheduled inspections of underground equipment covered by NG-EOP UG006, Underground Inspection and Maintenance. The following items are to be tested on a five year cycle, pad-mounted transformers, pad-mounted switchgears, and metallic handhole covers.
- 2.3.2 Testing for equipment elevated voltage shall be completed on underground facilities while completing working inspections covered by NG-EOP UG006. The metallic items to be tested are manholes covers, vault covers and grates, handhole covers, splice box covers, junction box covers, pad-mounted transformers, pad-mounted switchgears, and submersible equipment covers.

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	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 8 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

- 2.3.3 Starting in Fiscal Year 2013 and continuing thereafter, unless changed by subsequent order of the Rhode Island Public Utilities Commission, mobile contact voltage surveys will be performed in designated Contact Voltage Areas (CVA) The mobile surveys will be performed on a five-year cycle. A survey of 100 percent of the CVA will be performed the first year of the program followed by 20 percent of the CVA in successive years.
- 2.4 Daily Job Site Test Requirements
 - 2.4.1 Each job site where National Grid personnel or its contractors complete a work assignment shall be tested for equipment elevated voltage at the start and at the end of the work day or at start and at the completion of the assignment. This testing requirement is considered good utility practice and does not require specific documentation.
 - a. In a storm situation, where mutual aid is required, testing by other than National Grid personnel will not be required.

2.5 Exe mptions

2.5.1 A completely fenced in area where access is denied to the general public and where access is only achieved by climbing a fence. Good judgment is required by the tester in these scenarios.

3.0 FACILITIES WHERE EQUIPMENT ELEVATED VOLTAGE TESTING/DOCUMENTATION IS REQUIRED – MASSACHUSETTS

- 3.1 Company Owned Street Lights
 - 3.1.1 Company owned metallic street lighting standards are required to be tested for equipment elevated voltage on a five year cycle.
 - 3.1.2 Exceptions: Testing shall not be completed at locations where street light standards are not publicly accessible, such as facilities located in the center of highways that cannot be accessed without stopping traffic or creating potentially hazardous situations for the worker and/or public.
- 3.2 Overhead Distribution Facilities
 - 3.2.1 Towers and/or metallic poles with transmission facilities shall be tested for equipment elevated voltage at an annual rate of twenty-percent (20%) in conjunction with field inspections on a five-year cycle.
 - 3.2.2 The following equipment on wood transmission poles or structures require equipment elevated voltage testing at an annual rate of twenty-percent (20%) in conjunction with field inspections on a five-year cycle:
 - a. Metallic riser guard or conduit (company or non-company).
 - b. Uncovered or uninsulated down ground (company or non-company).
 - c. Down guy (company or non-company).

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	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 9 of 20
2.11294	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

d. Any other publicly accessible conductive piece of equipment (company or non-company) on the pole within reach from the ground.

3.3 Underground Facilities

- 3.3.1 Equipment elevated voltage testing is required on all of the following equipment where accessible to the public on a five year cycle.
 - a. All metallic manhole covers, vault covers and grates, junction box covers, handhole covers, pad-mounted transformers, secondary pedestals, and pad-mounted switchgears.

Exceptions: Non-metallic concrete or fiberglass pads or handholes or pull/splice boxes are not required to be tested.

- 3.4 Daily Job Site Test Requirements
 - 3.4.1 Each job site where National Grid personnel or its contractors complete a work assignment shall be tested for equipment elevated voltage at the start and at the end of the work day or at the start or at the completion of the assignment. This testing requirement is considered good utility practice and does not require specific documentation.
 - a. In a storm situation, where mutual aid is required, testing by other than National Grid personnel will not be required.

3.5 Exe mptions

3.5.1 A completely fenced in area where access is denied to the general public and where access is only achieved by climbing a fence. Good judgment is required by the tester in these scenarios.

4.0 TEST EQUIPMENT

- 4.1 A hand held device (proximity detection unit) that is capable of detecting voltage from 6 volts to 600 volts.
- 4.2 A portable AC digital high impedance volt meter must have the ability to take readings with and without an input load impedance of 500 ohms.
- 4.3 The handheld devices utilized shall be certified by an independent test laboratory as being able to reliably detect voltages of 6 600 volts. The following units have been certified:
 - 4.3.1 HD Electric model LV-S-5 (5-600 volts).

Fluke 85 Fluke 87 Fluke 170 series or equivalent Fluke 175 Fluke 177 Fluke 179 Fluke 187 Fluke 189

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Standards, Policies & Codes Susan Fleck			

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 10 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

4.4 Mobile Voltage Detection Equipment: Narda 8950/10 Stray Voltage System SVD2000 Stray Voltage Mobile Detector

5.0 TEST PROCEDURE

- 5.1 Job Briefing
 - 5.1.1 At minimum, the following information shall be communicated to all personnel at the beginning of each shift for equipment elevated voltage testing:
 - a. Structures are never to be touched with a bare hand while performing the tests, only the voltage detector or meter probe is to be used to make contact with the facilities.
 - b. Appropriate PPE shall be worn.
 - c. Each individual needs to be aware of his/her surroundings at all times.
 - d. Make sure to observe all traffic before entering a street, either at intersections or any other point.
 - e. Traffic safety vest (DOT Compliant Class II) is to be worn at all times when exposed to traffic. Be aware that when bending down, the visibility benefits of the traffic safety vest are diminished.
 - f. Obey all traffic control devices.
 - g. When working in the street, face oncoming traffic whenever possible.
- 5.2 Measurements for voltages will be performed in accordance with the following:
 - 5.2.1 Initial measurements for the presence of voltage shall be made using a certified proximity detection unit as noted in the testing equipment certified equipment list in Section 4.0, 4.3.
 - a. To verify the proper operation of the proximity detector, follow operating instructions for the particular certified unit being utilized, this is to be done daily.
 - b. After verification that the detection unit is working, approach the area/equipment to be tested. The proximity detector will illuminate prior to touching the area/equipment being tested if voltage is present. If the proximity detector does not illuminate in close proximity to the area/equipment touch the area/equipment to be tested with the probe of the unit.
 - 5.2.2 If this test detects voltage, repeat the test with the portable AC voltmeter (The 500 ohm resistor is NOT used in this initial test):
 - a. Measurements with a portable AC voltmeter shall be taken on clean bare metallic surface (structure, ground wire, etc.)
 - b. When using a portable AC voltmeter, connection shall be made to suitable neutral or ground source with the common (black) lead.

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	,		

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 11 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

- In locations where the neutral or ground point is at a distance in excess of the voltmeter lead length, the connection to the neutral/ground shall be made with up to 25' of # 16 stranded copper lead wire (covered), the other end of which shall be securely connected to the negative (black) probe of the meter. When using such "extension leads" appropriate care shall be taken in the placement of such leads so as to not create a physical hazard to workers, pedestrian or vehicular traffic.
- 2. In locations where a system ground is not available, or the existing ground registered voltage upon the proximity test, a metal rod shall be firmly embedded into the earth to a depth of no less than 6" to create a ground reference point for the measurement to be taken. An alternate method is available for obtaining a ground reference point utilizing an aluminum plate in lieu of driving a ground rod. The reference point should be as close as practicable to the facility being tested to simulate an equipment elevated voltage situation (3' to 4'.) On occasion longer leads may be necessary to find undisturbed earth (up to 25'.)
- c. The "live" meter probe lead shall then be placed into contact with the structure under inspection to determine the voltage.
 - 1. Voltages readings greater than 30 volts shall be recorded in the database for the site.
 - 2. For voltage readings less than 30 volts, install a 500 ohm input load impedance resistor on the volt meter. Take another voltage measurement and record this voltage in the database for the site.
- 5.2.3 Measurements for elevated voltages/contact voltage using mobile technology will be performed in accordance with the following:
 - a. Mobile testing is performed by contract crews driving pre-determined routes in Contact Voltage Areas searching for elevated voltage levels. The equipment used is mounted to vehicles and detects voltage levels greater than 1 volt while driving at speeds of up to 25 mph near underground facilities. Once elevated voltages are detected the crew stops and performs a thorough check with certified manual testing equipment to determine if there is contact voltage present.
- 5.2.4 Any positive indications by either mobile testing or hand held tools shall be followed up with multi-meter measurements on the target structures. Voltage measurements shall be taken in accordance with Section 5.2.2 above. The investigators shall verify that a suitable ground (i.e. a ground that is not energized) is used as a reference. Ground source location shall be marked with tape, paint or flag for future testing of repair work.
- 5.2.5 A Total Harmonic Distortion (THD) test method will be implemented as a pilot for Rhode Island mobile elevated voltage testing. THD will be determined by the

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File: NG-EOP G016 Equipment Elevated Voltage Testing MGA	Originating Department:	Sponsor:	
	Standards, Policies & Codes	Susan Fleck	

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 12 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

use of a Fluke Power Quality clamp meter or a Fluke scope meter both of which have the ability to measure THD.

6.0 CORRECTIVE ACTION REQUIREMENTS FOR ELEVATED VOLTAGE FINDINGS

6.1 State Specific Requirements

6.1.1 New York

If equipment elevated voltage condition is found and verified by the Test Procedure in Section 5.0, the site is to be guarded until made safe by Company personnel or if municipally owned, made safe by the owner or company. Guarded for the purpose of this EOP is defined as guarded by a person or a protective barrier that prevents public contact if the equipment elevated voltage found is greater than 1 volt. If the voltage measures less than 1 volt and is found to be consistent with system operation design (no visual evidence of a problem upon review) no further action is required. If the voltage measures greater than or equal to 1 volts and less than 4.5 volts it can either be guarded in person or by a protective barrier that prevents public contact, contact your supervisor for required action. Sound judgment shall be utilized in this application. If the voltage measurement is greater than or equal to 4.5 volts it shall be guarded by an equipment elevated voltage inspector or a Company employee that has been trained to stand by on energized facilities, and immediate response is required using the notification in Section 6.3 below.

6.1.2 Massachusetts and Rhode Island

If equipment elevated voltage condition is found and verified by the Test Procedure in Section 5.0, the site is to be guarded until made safe by Company personnel or if municipally owned, made safe by the owner or company. Guarded for the purpose of this EOP is defined as guarded by a person or a protective barrier that prevents public contact if the equipment elevated voltage found is greater than 4.5 volts. If the voltage measures less than 4.5 volts and is found to be consistent with system operation design (no visual evidence of a problem upon review) no further action is required. If the voltage measures greater than 4.5 volts and less than 8 volts it can either be guarded in person or by a protective barrier that prevents public contact, contact your supervisor for required action. Sound judgment shall be utilized in this application. If the voltage measurement is greater than 8 volts it shall be guarded by an equipment elevated voltage inspector or a Company employee who has been trained to stand by on energized facilities; an immediate response is required using the notification in section 6.3 below

6.1.3 Rhode Island Total Harmonic Distortion Pilot

Under the Total Harmonic Distortion (THD) pilot in Section 5.2.5, if during mobile testing of the Contact Voltage Area the voltage measures greater than 1 volt and less than 4.5 volts and has a total harmonic distortion of less than 10% the voltage will be considered contact voltage. These areas will then be safeguarded from the public and permanent repairs will be made. If the total harmonic

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File: NG-EOP G016 Equipment Elevated Voltage Testing MGA	Originating Department:	Sponsor:	
	Standards, Policies & Codes	Susan Fleck	

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 13 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

distortion is greater than 10% and no visual defects are found, no further action will be required.

6.1.4 New York and Rhode Island

In the event of an elevated voltage finding on an electric facility or street light during the stray voltage test procedure, all publicly accessible structures and sidewalks within a minimum 30 foot radius of the electric facility or street light must be tested for stray voltage.

- 6.2 The following notification process for personnel to respond shall be utilized.
 - 6.2.1 Notification by location:
 - a. New York: contact Systems Operations Dispatch 1-877-716-4996
 - b. New England North, Northborough Distribution Control Center:
 - 1. North Shore (MA) 1-877-247-3606
 - 2. Merrimack Valley (MA) 1-877-247-3607
 - 3. Central (MA) 1-877-247- 3608
 - 4. Western (MA) 1-877-247-3609
 - c. New England South, Northborough Distribution Control Center

1. Capital (RI)	1-877-247-3610
2. Coastal (RI)	1-877-247-3599
3. Southeast (MA)	1-877-411-3812
4. South Shore (MA)	1-877-411-5599

- 6.2.2 Inform the operator that this is an equipment elevated voltage call, giving inspector name, company (if not National Grid), unique ID, address where problem is identified, facility number, circuit number, ownership, type of equipment, voltage found and whether they are physically guarding or leaving the site after flagging and installing a protective barrier. National Grid personnel or designee will be assigned to respond.
- 6.3 Temporary repairs may be used to correct the equipment elevated voltage thereby removing the need to guard the site.
- 6.4 Except as noted in Section 6, 6.6, permanent repairs to the equipment shall be made within 45 days of the occurrence.
- 6.5 If permanent repairs can not be made within 45 days due to extraordinary circumstances, the company shall periodically perform site visits to monitor the condition of the temporary repair. For New York, all exceptions shall be identified and justified in the annual reporting of the program to the NYPSC.
- 6.6 The Stray Voltage Tester/Equipment elevated Voltage Inspector may detect a minimal voltage level that is attributable to the design of the facility and not the result of an improper condition, no corrective action is required in this instance.

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File: NG-EOP G016 Equipment Elevated Voltage Testing MGA Originating Department: Sponsor:			
	Standards, Policies & Codes	Susan Fleck	

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 14 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

- 6.7 The individuals conducting the equipment elevated voltage tests on street light standards shall have a supply of "Angel guards" available for installation if the cover is missing or wires are found to be exposed to the public at the time of testing. Angel guards shall only be installed after the testing of the street light standard is complete and 1) there is no indication of equipment elevated voltage above 1 volt, or 2) repairs have been completed to correct the equipment elevated voltage.
- 6.8 The equipment elevated voltage inspector shall report any potentially hazardous conditions found on National Grid facilities seen visually during the survey process.
- 6.9 Customer Owned Equipment
 - 6.9.1 Where the Company finds equipment elevated voltage above 1 volt and identifies its source as customer-owned equipment, the Company shall guard the site and notify the customer or a responsible person, as appropriate, that a potentially hazardous situation exists. The Company shall advise the customer or responsible person that the cause of the equipment elevated voltage shall be immediately remedied.
 - 6.9.2 Company personnel are encouraged to work with the customer to determine and rectify the problem. If the customer agrees to accept the Company's assistance, the Company may charge a reasonable cost for this effort.
 - a. The Company may temporarily remove a customer's meter or take such other actions as are appropriate and necessary to protect the public.

7.0 DATABASE REQUIREMENTS

- 7.1 The database in use shall be easily searchable for information and reporting.
- 7.2 Information fields required to be completed for facilities:

Survey Date Region District Contractor GIS ID/Asset # (Unique ID) Facility Type Owner Feeder/Circuit Line # Tax District Pole/Structure/Equipment ID Street Name **Inspectors Name GPS** Taken Pre-load Match Equipment elevated Voltage Test Required Voltage Found Y/N Voltage Measurement

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File: NG-EOP G016 Equipment Elevated Voltage Testing MGA Originating Department: Sponsor:				
	Standards, Policies & Codes	Susan Fleck		

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Type of Equipment (See Appendix A) Immediate Action Taken Person Notified Permanent Repair Date Type of Repair Person Responsible for repair (Employee ID)

7.3 Information fields required to be completed for facilities in mobile testing

Survey Date Region District Contractor Facility Type Owner Pole/Structure/Equipment ID Street Name GPS taken Voltage Measurements Type of Equipment (see Appendix A) Immediate Action Taken Person Notified Permanent Repair Date Type of Repair

8.0 NEW YORK ANNUAL REPORTING AND CERTIFICATION REQUIREMENTS

- 8.1 Each Regional program supervisor shall provide certification to the program manager that the Region they supervise has complied with the equipment elevated voltage testing and inspection program as ordered by the PSC.
- 8.2 The program manager shall provide certification to the Vice President Distribution Network Strategy and the Senior Vice President of Customer Operations & Maintenance that the organization has complied with the equipment elevated voltage testing and inspection program as ordered by the PSC.
- 8.3 Written certification of the completion and results of every equipment elevated voltage test and inspection shall be completed, as well as a certification that all unsafe conditions identified have been remediated by appropriate company personnel.
- 8.4 The President or officer with direct responsibility for overseeing the equipment elevated voltage testing and inspection shall provide an annual certification to the NYPSC that the Company has tested all of its publicly accessible conductive surface electric facilities and all street lights, as well as completed all required inspections.
- 8.5 The President or officer with direct responsibility for overseeing facility inspections shall provide an annual certification to the Commission that the utility is in compliance with its inspection program and has inspected the requisite number of electric facilities. Additionally, at the end of the five-year inspection cycle, the officer shall certify that all of the utility's electric facilities have been inspected at least once.

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File: NG-EOP G016 Equipment Elevated Voltage Testing MGA Originating Department: Sponsor:			
	Standards, Policies & Codes	Susan Fleck	

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 16 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

- 8.6 The annual reporting and certification is required by February 15 of each year. In addition to certifications, it shall address the following:
 - 8.6.1 Details the results of stray voltage test results and inspections conducted over the 12-month period ending December 31 of the prior calendar year. (A separate report will be required for inspections from November 1 – December 31, 2008 to account for transition to calendar year reporting.)
 - 8.6.2 Addresses the performance mechanism contained in Section 10 of the PSC Order Adopting Changes to Electric Safety Standard effective December 15, 2008 (December 15, 2008 Order).
 - 8.6.3 Contain certification describe in 8.3, 8.4 and 8.5 of this section.
 - 8.6.4 Contain a breakdown of the voltage findings in a tabular format as detailed in Attachment 1 of the December 15, 2008 Order; for all findings that result in a reading of 1 V or more after completion of mitigation efforts, a detail report of company efforts shall be provided.
 - 8.6.5 Contain a breakdown of the shock reports received from the public as detailed in Attachment 2 of the December 15, 2008 Order.
 - 8.6.6 Discussion of the analysis undertaken on the causes of the stray voltage within the Company's electric system, the conclusions drawn there from, the preventative and remedial measures identified, and the Company's plan to implement those measures.
 - 8.6.7 Description of the priority levels used to gauge the severity of a deficiency, including repair timeframes, and details the requirements for training personnel to properly identify and categorize the deficiencies.
 - 8.6.8 Contain a breakdown of facilities to be inspected, unique inspection conducted per year, and the cumulative number of unique inspections conducted to meet the five year requirement.
 - 8.6.9 Contain a breakdown of the deficiencies found, permanent repair actions taken by year, whether a repair was completed within the required timeframe, and the number of deficiencies awaiting repair. This information should be provided on a yearly basis by priority level and by equipment groupings as detailed in Attachment 3 of the December 15, 2008 Order.
 - 8.6.10 Contain a review and analysis of the inspection results. Identifying areas of concern along with remedial actions or future plans to alleviate inadequacies in current program assets.
 - 8.6.11 Description of the quality assurance program along with the results from quality assurance activities conducted during the year.
 - 8.6.12 Any additional information that is pertinent to the issues addressed by the safety standards should also be included.

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File: NG-EOP G016 Equipment Elevated Voltage Testing MGA Originating Department: Sponsor:			
	Standards, Policies & Codes	Susan Fleck	

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 17 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

- 8.7 The Company shall file reports on their mobile stray voltage testing with the Secretary of the New York PSC within 45 days after completion of the mobile testing or February 15, 2011, whichever is earliest, and in each subsequent year. The filing shall include the historic results and costs associated with the manual test program in each area listed in Section 1.5 of this procedure.
- 8.8 The Company is required by the December 15, 2008 Order to have independence in the quality assurance program required by the order. The management and personnel performing the quality assurance activities shall be separate from those performing the required stray voltage testing and inspection activities.
- 8.9 The Company shall maintain its written certification and other documentary proof of its testing at its' Albany, Buffalo, and Syracuse office facilities. These documents shall be made available to the public for review upon request.

9.0 MASSACHUSETTS REPORTING REQUIREMENTS

- 9.1 National Grid shall submit an annual report that includes the following:
 - 9.1.1 Annual reports that list inspection and testing data, including number of inspections conducted by equipment type.
 - 9.1.2 Number of equipment elevated voltage events detected by inspection personnel versus call-ins or notification by third parties.
 - 9.1.3 Variance reports on current year inspection targets.
 - 9.1.4 Equipment elevated voltage events detected on equipment that is not included in equipment elevated voltage equipment inspection schedules (which will enable the DTE to determine if the company is inspecting and testing the correct equipment).
 - 9.1.5 Number of exceptional or non-routine events that required reporting to OSHA or other government organizations due to injuries or other substantive impacts

10.0 Rhode Island Reporting Requirements

- 10.1 National Grid shall submit an annual report that includes the following in a searchable form:
 - 10.1.1 Event record number
 - 10.1.2 Location of testing
 - 10.1.3 Date and time of testing
 - 10.1.4 Company or customer asset
 - 10.1.5 Failed equipment type
 - 10.1.6 Voltage recorded
 - 10.1.7 Personal injuries to members of the public, pets or property damage

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	Standards, Policies & Codes	Susan Fleck	

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 18 of 20
	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

- 10.1.8 Any other equipment involved and age
- 10.1.9 Prior incidents at this location in the past five years
- 10.1.10 Corrective actions taken at the location and date taken
- 10.1.11 Number of customers if service is interrupted while making repairs
- 10.1.12 Duration of interruption
- 10.1.13 Summary of investigation into cause of the incident
- 10.1.14 Number of calls to the company "shock" line
- 10.1.15 Total repair costs by Contact Voltage Area
- 10.1.16 All information as provided for in Section 7.3

The Company will provide a summary of the above information as part of the report. In addition, the Company will include a recommendation for which specific CVAs will be tested the following year, whether there are any recommended changes to the CVAs and whether there are any advances in technology for detection of elevated voltages.

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File: NG-EOP G016 Equipment Elevated Voltage Testing MGA Originating Department: Sponsor:					
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11.0 TYPE OF EQUIPMENT - APPENDIX A

ТҮРЕ	CODE	EQUIPMENT DESCRIPTION
Distribution 910		Pole
911		Regulator
912		Sectionalizer
913		Recloser
914		Ground
915		Guy
916		Riser
	917	Switch Handle Mechanical Operated
	929	Distribution – Other (use comments)
Transmission 930		Pole
931		Tower
932		Guy
933		Ground
934		Riser
	935	Switch Hand Mechanical Operator
	949	Transmission – Other (use comments)
Underground 950		Handhole
951		Manhole
952		Switchgear
953		Transformer
	954	Vault – Cover/Door
	969	Underground – Other (use comments)
Street Light	970	Handhole
971		Standard
	979	Street light – Other (use comments)
Customer Street Light/Other	980 Han	dhole
981		Standard
	989	Customer SL/Other – Other (use
		comments)
Traffic Control	990	Handhole
991		Standard
992		Control Box
993		Pedestrian Crossing Pole
	999	Traffic control – Other (use comments)

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File: NG-EOP G016 Equipment Elevated Voltage Testing MGA Originating Department: Sponsor:					
Standards, Policies & Codes Susan Fleck					

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G016
national grid	GENERAL	Page 20 of 20
2.11294	Equipment Elevated Voltage Testing	Version 2.0 – 09/30/13

12.0 REVISION HISTORY

Version	Date	Description of Revision
1.0	04/01/11	This document supersedes document dated 08/17/09.
2.0	09/30/13	This document supersedes document dated 04/01/11.

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File: NG-EOP G016 Equipment Elevated Voltage Testing MGA Originating Department: Sponsor:				
Standards, Policies & Codes Susan Fleck				

Appendix 10

NG-USA EOP D004 Distribution Line Patrol and Maintenance

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP D004
national grid	DISTRIBUION OVERHEAD	Page 1 of 11
national grid	DISTRIBUTION LINE PATROL AND MAINTENANCE	Version 1.0 – 04/01/11

INTRODUCTION

The purpose of this procedure is to outline the requirements for the patrol and maintenance activities associated with National Grid Distribution feeders. The Distribution Maintenance Program was designed to provide for a patrol and subsequent maintenance of each distribution feeder once every five (5) years in NY and once every six (6) years in NE. The patrols are conducted by a Distribution Inspector identifying all required maintenance on a *Windows*® based hand held computer. The maintenance items identified through this patrol are separated into four priority levels 1, 2, 3, and 4. The problem codes identified default to the appropriate priority level. The default priority level can be adjusted by the individual performing the inspection based on actual field conditions. These priority levels are defined as follows:

Level 1- An identified facility/component or tree condition that must be repaired/replaced within 1 week.

Level 2 - Identified facility/component condition that must be repaired/replaced within 1 year.

Level 3 – Identified facility/component condition that must be repaired/replaced within 3 years.

Level 4 – This priority category is to collect inventory information on actual field conditions to be used by Investment Strategy and Work Planning.

All Level 1 priority conditions identified in the field shall be called in by the Distribution Inspector as follows:

Notification by location:

New York: System Operations Dispatch 1-877-716-4996 NE North: Westboro Control Center 1-508-421-7879 NE South: Lincoln Control Center 1-508-421-7885

Detailed information provided to the regional notification location: Identify yourself as a Company Distribution Inspector and your work reporting area.

Details of the Level 1 Priority Condition:

Problem found.

District, Feeder No., Line No., Tax District and Pole No.

Street address and any additional information that would assist in finding the location of the problem.

If you are standing by or have secured the location.

Notification to area Inspections Supervisor for follow-up.

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP D004
nationalgrid	DISTRIBUION OVERHEAD	Page 2 of 11
national gria	DISTRIBUTION LINE PATROL AND MAINTENANCE	Version 1.0 – 04/01/11

PURPOSE

This procedure applies to all personnel involved with or responsible for the inspection and repair of Overhead (OH) Distribution facilities, Underground Residential Developments (URDs) and Underground Commercial Developments (UCDs).

ACCOUNTABILITY

- 1. Distribution Engineering Services
 - A. Update EOP as necessary.
- 2. Customer Operations
 - A. Ensure the work generated by the Distribution Maintenance Program and assigned by Asset Strategy and Investment Planning is completed in the appropriate time frame.
 - B. Request assistance from CMS when necessary to complete work assigned in the appropriate time frame.
- 3. Contract Management Services
 - A. At the request of Customer Operations obtain, schedule and manage contractors to perform inspections and required maintenance.
 - B. Provide input into program revisions.
- 4. Distribution Inspector
 - A. Demonstrate the ability to identify maintenance concerns and the aptitude to become proficient in the use of a hand held computer and desktop computer.
 - B. Demonstrate the understanding and requirements of this NG-EOP D004.
 - C. Possess the ability to do walking patrols, collect information on a hand held, download to a desk top computer, edit data, provide requested information/reports/work tickets to supervision, and track/close out work completed in the database system.
- 5. Distribution Asset Strategy
 - A. Select program codes/circuits to be scheduled for maintenance repair work using data collected through Distribution Maintenance Program.
 - B. Approve changes to the maintenance code table.
 - C. Select circuits to be patrolled for a running five-year cycle.
 - D. Provide input into program revisions.
- 6. Inspections
 - A. Ensure circuits scheduled for patrol are completed each year.
 - B. Provide qualified personnel as inspectors to provide consistent and accurate identified maintenance concerns/problems.
 - C. Provide program management.
 - D. Report System Maintenance progress monthly by Division.

- 7. Process and Systems.
 - A. Provide and support database.

REFERENCES

Applicable National Grid Safety Rules and Procedures

NY PSC Order 04-M-0159

NY PSC Order Order Adopting Changes to Electric Safety Standard, December 2008

Elevated Equipment Voltage Testing NG-EOP G016

Underground Inspection NG USA EOP UG006

Massachusetts DTE Directive 12/9/05

DEFINITIONS

Patrol: A walking/vehicle assessment of National Grid distribution facilities for the purpose of determining the condition of the facility and its associated components.

Hand Held Computer: A *Windows*® based data recording device that is used in the field to create a record of conditions found.

Desktop Computer: A personal computer that is connected to the National Grid network that is used to download the Hand Held Computer and retrieve the information in the form of reports.

Distribution Inspector: An employee that has been trained to identify deficiencies or non-standard construction conditions on National Grid facilities.

TRAINING

Provide training upon request.

DOCUMENT CONTENTS

Table of Contents

1.0	DISTRIBUTION PATROL	. 5
2.0	EQUIPMENT TO BE INSPECTED AND MAINTENANCE CODES	. 6
3.0	DISTRIBUTION MAINTENANCE DATA BASE	. 8
4.0	MAINTENANCE SCHEDULE	. 8
5.0	COMPLETION OF MAINTENANCE CODES	. 8
6.0	REVISION HISTORY	11

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ELECTRIC OPERATING PROCEDURE DISTRIBUION OVERHEAD DISTRIBUTION LINE PATROL AND MAINTENANCE

- 1.1 Distribution Patrols are conducted by a Distribution Inspector that has been trained to identify deficiencies or non-standard construction conditions on National Grid facilities. Distribution patrols are scheduled in such a manner that each distribution feeder is examined in the field once every five (5) years in NY and once every six (6) years in NE. In NY, the patrols shall be completed by December 31 due to regulatory reporting. In NE the patrols shall be completed by March 31. The most current Distribution Patrol schedule can be found in the Distribution Maintenance Program data base (RPT 1310 Feeder Patrol Status). New Distribution Feeders added to the system will be incorporated through our Geographic Information System (GIS) system and added to the appropriate inspection cycle. If the Distribution Inspector finds unmapped facilities from the information supplied from GIS, the inspector shall add the information into the *Windows*® based hand held computer for maintenance tracking purposes. NG-USA EOP G011, Preparation and Distribution of Electric Facilities Records, identifies the correct procedure for updating GIS records, if needed.
- 1.2 Distribution Patrol data is recorded by the Distribution Inspector on a *Windows*® based hand held computer and downloaded to the Distribution Maintenance Program. The Distribution Inspector shall also complete maintenance code 118, stencil installed and maintenance code 220, guy wire marker, maintenance code 660, switchgear missing nomenclature, maintenance code 681, transformer missing nomenclature, and maintenance code 745, enclosure missing nomenclature if found deficient upon inspection while at the site. Maintenance Codes are shown on the Distribution Field Survey Worksheet #NG0236 (Page 7). The Distribution Field Survey Worksheet can be used by the field to record maintenance codes are downloaded to the Hand Held Computer each time there is a change that affects the maintenance code table contained in the Distribution Maintenance Database. Printed copies of the latest maintenance code tables may be obtained by running a report on the look up tables from the Distribution Maintenance Database.
- 1.3 The *Windows*® based hand held computer is to be used as the primary vehicle for recording maintenance problems in the field. There may be times where it is not practicable to use the hand held computer. In these cases, the person performing the inspection should record the information on the Distribution Field Survey Worksheet #NG0236).

http://docuweb3:8092/ngs/servlet/NgStreamer?name=NG0236+Dist+Field+Survey+Wksht +D004

Once complete, the Distribution Field Survey Worksheet information must be input into the Distribution Maintenance Database by the inspector, clerk, or supervisor or their designee.

ELECTRIC OPERATING PROCEDURE DISTRIBUION OVERHEAD DISTRIBUTION LINE PATROL AND MAINTENANCE

2.0 EQUIPMENT TO BE INSPECTED AND MAINTENANCE CODES

Wood Pole Mounted Street Light Poles Crossarms Insulators Primary Transformers Capacitor Regulator Sectionalizer Recloser Switches Ground Guy Anchor Secondary Service ROW GIS Spacer Cable Cutout Risers Switchgear Padmount Transformers Enclosures

ELECTRIC OPERATING PROCEDURE DISTRIBUION OVERHEAD DISTRIBUTION LINE PATROL AND MAINTENANCE

Page 7 of 11

DISTRIBUTION FIELD SURVEY WORKSHEET

national**grid**

EGION EEDER		TRICT EMI	PLOYEE	E ID DATE	-
NE # / ROUTE #	1140	POLE #/SUFFIX #			_
OCATION		TTOLE WOUTFIA #			_
MAIN LINE CATV ATTACHMENT 1 2 3 4	5 #	MAIN LINE TELEPHONE ATTACHMENT 1	2 3 4	5 STREET LIGHT ATTACHED Ses	7 N
WOOD POLE MOUNTED STREET LIGHT	P/Q	SECTIONALIZER	P/Q	CUTOUT	P
			/	280 1,2,9 (R) Defective Cutout	
98 1,2,9 (NR) C Street Light Hazard Cond.	1	180 1,2,9 (NR) Oil Weeping	1	281 2 (R) Potted Porcelain	
99 2,9 (NR) ONT Bonded POLE	1	181 1,2 (R) Bushings Broken/Cracked			-
		182 2,9 (R) Missing Ground Wire	1	282 4 (NR) Banded Porcelain Banded Porcelain	-
06 3 (NR) Dbl Wood-NG Trnsf Req'd	1	183 4 (NR) Control Cab Height/Ground	1	283 4 (NR) Enclosed	-
07 4 (NR) 🗌 Dbl Wood-Tel Trnsf Reg'd	1	184 3,9 (R) 🗌 Improper/Missing Bond	1	284 4 (NR) ON Porcelain	
08 4 (NR) 🗆 Dbl Wood-CATV Trnsf Req'd	1	185 3,9 (R) Animal Guard Missing	1	285 4 (NR) 🗆 Hybrid	
0 1,2,9 (R) Broken/severely damaged	1	186 3,9 (R) LA Blown/Missing/Improper	1	286 4 (R) C SpurTap Not Fused	
1 1,2,3,4 (RP) Visual Rotting Grd Line	1	RECLOSER		289 4 (NR) Other	
3 3 (NR) CuNap Treated Bthmark Yr	1	190 1,2,9 (NR) Oil Weeping	1	RISER	
4 2,4 (R) Woodpecker Holes	1	191 1,2 (R) D Bushings Broken/Cracked	1	290 1,2,3,9 (NR) Improp Cable Supp/Term	—
15 1.2.3.9 (NR) C Riser Guard Reg'd	1	192 2,9 (R) Missing Ground Wire	1	291 2,9 (R) Improper/Missing Bond	
6 1,2,3,4 (RP) Visual Rotting Pole Top	1	193 4 (NR) Control Cab Height/Ground	í	292 3,9 (R) Animal Guard Missing	1
7 1,2 (NR) Leaning Pole	1	194 3,9 (R) □ Improper/Missing Bond	1	293 2,3,9 (R) □ LA Blown/Missing/Improper	+
					-
8 P (NR) Stencil / Correction Reg'd	1	195 3,9 (R) Animal Guard Missing	1	INFRARED	_
9 4 (NR) 🗌 Bird's Nest	1	196 2,3,9 (R) 🗌 LA Blown/Missing/Improper	1	400 1,2,3,9 (R) Problem - Switch	
CROSSARM		SWITCH		401 1,2,3,9 (R) Problem - Cutout	
20 1,2,4,9 (R) 🗌 Damage Arm	1	203 1,2 (R) Gang Oper'd Defective	1	402 1,2,3,9 (R) Problem - Splice	L
1 1,2,4 (NR) 🗌 Loose/Defective Pins	1	204 1,2,3,9 (R) Single Phase Defective	1	403 1,2,3,9 (R) 🗌 Problem - Other	
22 3,9 (NR) Wooden Pine 13.2kv	1	205 3,9 (R) Improper/Missing Bond	1	HANDHOLES	
3 1,2,4 (R) Loose Brace, Hrdwr	1	207 3,4,9 (R) LA Blown/Missing/Improper	1	600 1,2,9 (NR) Broken/Damaged/Unsecured	Ē
4 1,2,4,9 (R) Damage Dbl Crossarm	1	208 2,9 (NR) Handle Not Bonded	i	602 P (NR) Missing Nomenclature	\vdash
25 1,2,4,9 (R) Damage Dif Crossarm Damage Alley Arm	1	GROUND	1	603 1 (R) Secondary Needs Repair	H
			,		+
27 1,2,9 (R) Primary On Arm	1	210 1,2,9 (R) UVire Broken/Loose	1	604 4 (NR) Other (use comments)	_
INSULATOR		211 1,2,9 (R) 🗌 Hazard Condition	1	SWITCHGEAR	
30 1,2 (R) 🗌 Broken/Cracked/Flashed	1	212 3,4 (NR) 🗌 Guard Req'd	1	651 1,2,3,9 (R) 🗆 Barrier Brkn/Dmgd/Unsec	
1 1,2,9 (R) 🗌 Floating	1	213 3,4 (NR) 🗌 Non Standard	1	652 1,2 (NR) Base Broken/Damaged	
2 3,4 (NR) 🗌 I7 Aluminum Capped	1	214 3,9 (NR) Not Bonded to Neutral	1	654 2,9 (R) Cable Not Bonded	
3 3,9 (R) Non-Standard Voltage	1	GUY		656 2,9 (R) Door Broken/Damaged	
4 3,4 (NR) AL Cap Assoc w/Switch/Fuse	1	220 P (NR) Guy Wire Marker	1	657 F (NR) C Excessive Vegetation	1
PRIMARY		221 2,9 (NR) Not in Compliance w/Code	1	659 2,9 (R) Missing Ground	+
10 1,2,9 (R) Insuff. Grnd Clearance	1		1		+
		222 3,9 (NR) Excessive Slack		660 P (NR) Missing Nomenclature	-
1 1,2,3,9 Damaged Cond/Brkn Strands	1	223 1,2,3,9 (R) Broken Wire	1	661 4 (NR) □ Other 662 4 (NR) □ Rusted/Paint Peeling	-
12 1, F (NR) Limbs on Primary	1	225 4 (NR) Guy not Bonded/Isolated	1	662 4 (NR) L Rusted/Paint Peeling	
5 1,2,3,9 (R) 🗌 Dmg'd Stirups/Connector	1	per Standards		PAD TRANSFORMER	_
16 2,3 (R) 🗆 Improper Sag	1	ANCHOR		672 1,2,3,9 (R) Bushing Broken/Cracked	
7 4 (R) LA Missing Transition	1	226 1,2,3,9 (NR) 🗆 Reg'd - Jt. Owned	1	673 1.2.P (R) Door Broken/Damaged	
8 4 (R) 🗆 LA Missing End of Line	1	227 1,2,3,9 (NR) Reg'd - Sole NG	1	675 1,2 (R) Elbows/Terminator/	
19 3,9 (R) 🗆 LA Blown	1	SECONDARY		Tracking/Burned	
TRANSFORMER		231 1,F (NR) Limb on Secondary	1	676 F (NR) Excessive Vegetation	
0 1,2,9 (NR) 🗌 Oil Weeping	1	232 1,2 (NR) Improper Sag	1	680 2,9 (R) I Missing Ground	-
51 1,2 (R) Bushings Broken/Cracked	1	234 1,2,3,9 (NR) Floating	1	681 P (NR) Missing Nomenclature	-
			/		+
52 2 (R)	1	SERVICE		684 1,2,9 (NR) Oil Weeping	⊢
53 2,4 (R) LA Blown/Missing/Improper	1	240 1 (NR) Ins. Loose from House	1	685 1,2,3,4,9 (NR) Pad Broken/Damaged	1
55 4 (R) 🗆 Animal guards required	1	241 1,F (NR) Limb on Service	1	686 4 (NR) Protection (Ballards)	L
56 3,9 (NR) 🗌 Non Std Install of Gap	1	243 1 (NR) Non Std/Unsecured	1	687 4 (NR) C Rusted/Paint Peeling	
57 2,9 (R) 🗌 Improper/Missing Bond	1	ROW		ENCLOSURES	
CAPACITOR		250 F (NR) Brush/Tree/Washout	1	740 1,2,3,4,9 (R) Base Broken/Cracked	
0 1,2,9 (NR) Oil Weeping	1	GIS		741 1,2,3,9,P (R) Door Brkn/Dmgd/Unsec	
1 1,2,9 (R) Bulging	1	260 4 (NR) Ap Doesn't Match Field	1	742 1,2,3,9 (R) Elbows Tracking/Burned	
2 1,2 (R) Bushings Broken/Cracked	1	261 4 (NR) Pole/Line Numbering Error	1	743 F (NR) C Excessive Vegetation	1
3 2.9 (NR) Missing Ground Wire	1	262 4 (NR)		744 2 (NR)	+
			1		+
4 2,9 (NR) Blown Fuse	1	263 4 (NR) Equip Removed in Field,	1	745 P (NR) D Missing Nomenclature	-
5 3,9 (NR) Improper/Missing Bond	1	Remove From GIS		746 4 (NR) C Rusted/Paint Peeling	L
6 3,9 (R) 🗆 Animal Guard Missing	1	269 4I (NR) C Other GPS/GIS Errors	1	POLE INSPECTION	
7 3,9 (R) 🗆 LA Blown/Missing/Improper	1	SPACER CABLE		801 1,2,3,4,9 (NR) Identified Priority Pole	
8 4 (NR) Control Cab Heigh/Ground	1	270 1,2,3,9 (R) Damaged/Missing Spacer	1	802 1,2,3,4,9 (NR) Identified Reject Pole	L
REGULATOR		271 1,2,3,9 (R) Bracket Damage	1	803 4 (NR) C Excessive Checking	
0 1,2,9 (NR) Oil Weeping	1	272 3.9 (R) Bracket Not Bonded	1	804 4 (NR) Climbing Inspection	
1 1,2 (R) Bushings Broken/Cracked	1	273 3,9 (R) Messenger Not Bonded	İ		
2 2,9 (R) Missing Ground Wire	1	274 3,9 (R) Messenger Guard Missing	1		t
	1		1	KEY	-
4 4 (NR) Control Cab Height/Ground		276 3,9 (R) Uncovered Splice	1		
5 3,9 (R) Improper/Missing Bond	1			P/Q = Priority / Quantity	20
76 3,9 (R) Animal Guard Missing	1			NR = Maint. Code May Not Direct Affect Rel	lia
7 3,9 (R) 🗌 LA Blown/Missing/Improper	1			R = Maint. Code May Affect Reliability	
				RP = Maint. Code May Affect Reilability and	1 H
			1	Specific Program to Place to Address	

NG0236 (01.11)

3.0 DISTRIBUTION MAINTENANCE DATA BASE

- 3.1 The Distribution Maintenance database consists of information collected in the field down loaded from the *Windows*® based hand held computer and data gathered from other sources entered from the desktop computer. The *Windows*® based hand held computer can be down loaded to any National Grid desk top computer that is connected to the network by an employee that has been authorized to perform this function. The Distribution Maintenance database is used by various departments throughout National Grid to generate maintenance reports and cost estimates.
- 3.2 The Distribution Maintenance database contains information to be used by Asset Strategy and Investment Planning to track maintenance codes that may affect reliability (R), affect reliability that have a specific program in place to address (RP), or may not directly affect reliability (NR):

4.0 MAINTENANCE SCHEDULE

- 4.1 Maintenance activities are scheduled by priority Levels. All "Level 1 Priority" conditions identified must be repaired/corrected within 1 week. All "Level 2 Priority" conditions identified must be repaired/corrected within 1 year. All "Level 3 Priority" conditions must be repaired within 3 years. Level 4 Priority is for inventory purposes only.
- 4.2 Once the Distribution Feeder is completed in the Distribution Maintenance Database or 21 days have elapsed since the inspection, the Level 2 and Level 3 Priority maintenance codes are downloaded into STORMS. Expense maintenance work goes straight to scheduling while the capital work goes to Distribution Design. Level 1 Priority maintenance codes are communicated by the Distribution Inspector directly to the field operations group for the area where the feeder is located.

5.0 COMPLETION OF MAINTENANCE CODES

- 5.1 Level 1 priority maintenance codes completion process:
 - 5.1.1 Distribution Inspector contacts System Operations Dispatch (SOD) providing information on the Level 1 maintenance item and fills out a Level 1 Priority Report Form (page 10).
 - 5.1.2 SOD generates a PowerOn order from Regional Control.
 - 5.1.3 Inspections Supervisor captures PowerON ID # and details for Level 1 maintenance item status. Inspections Supervisor tracks Level 1 maintenance status with operations ensuring that the Level 1 item is completed within 1 week. Inspection Supervisor closes out the Level 1 maintenance item in the Distribution Maintenance Database by adding the PowerOn ID # number to maintenance record.

5.2 Level 2 and Level 3 priority maintenance codes are completed in the Distribution Maintenance database once the 699 requirement is completed in STORMS for the work request associated with the maintenance code.

ALL MAINTENANCE WORK IS TO BE COMPLETED PER NATIONAL GRID DISTRIBUTION STANDARDS.

ALL MAINTENANCE WORK PERFORMED THAT WAS IDENTIFIED ON THE WORK ORDER OR DISCOVERED DURING THE REPLACEMENT/REPAIR/CORRECTION OF THE ORIGINAL MAINTENANCE PROBLEM MUST BE LISTED ON THE DATABASE AND THEN CLOSED OUT WHEN COMPLETE.

Level "1" & Elevated Voltage Priority Report Form

Any Level "1" Priority or Elevated	Voltage condition found
must be called into Dispatch.	

Feeder:	
Line #:	-
Pole #:	-
Closest Meter #:	
Street Address:	-
City/Town:	_
Level "1" Priority/Elevated Voltage condition	on found.

Call Dispatch to inform that this is either an Elevated Voltage call or an Inspection issue.

Dispatcher notified:

Date/Time: _____

Inspector:

6.0 REVISION HISTORY

Version	Date	Description of Revision
1.0	04/01/11	This document supersedes document dated 08/17/09.

Appendix 11

NG-USA EOP UG006 Underground Inspection and Maintenance

	• •	Doc No.:	NG-USA EOP UG006
nation	nal grid	Page:	Page 1 of 8
ELF	ECTRIC OPERATING PROCEDURES	Date:	08/17/09
SUBJECT:	Underground Inspection and Maintenance	SECTIO	N: Underground

GENERAL INFORMATION:

The purpose of this procedure is to outline the requirements for the patrol and maintenance activities associated with National Grid's underground transmission and distribution facilities. The variance in inspection procedures in New York, Massachusetts, New Hampshire, and Rhode Island service territories is due to the requirements of New York Public Service Order 04-M-0159 and the Massachusetts Department of Telecommunications and Energy recommendations of December 9 2005, which is incremental to National Grid in New York and Massachusetts.

This program is designed for the patrol and designated maintenance of underground facilities on a five year schedule. The Inspector will record all required maintenance on an approved National Grid database.

The underground distribution facility maintenance items identified through this patrol are separated into four priority levels 1, 2, 3, and 4. The problem codes identified default to the appropriate priority level. The default priority level can be adjusted by the individual performing the inspection based on actual field conditions. These priority Levels are defined as follows:

Level 1- An identified facility/component or tree condition that must be repaired/replaced within 1 week.

Level 2 - Identified facility/component condition that must be repaired/replaced within 1 year.

Level 3 – Identified facility/component condition that must be repaired/replaced within 3 years.

Level 4 – This priority category is to collect inventory information on actual field conditions to be used by Investment Strategy and Work Planning.

All Level 1 priority conditions identified in the field shall be called in by the Underground Inspector as follows:

- 1. Notification by location:
 - a. New York: contact System Operations Dispatch 1-877-716-4996.
 - b. Bay State West and North & Granite: Westboro Control Center 1-508-389-9032.
 - c. Bay State South, and Ocean State: Lincoln Control Center 1-401-335-6075.
- 2. Detailed information provided to the regional notification location:
 - a. Identify yourself as a Company Underground Inspector and your work reporting area.
 - b. Details of the Level 1 Priority Condition:
 - i. Problem found.
 - ii. District, Circuit/Feeder No., Line No., Tax District and Manhole/vault No.
 - iii. Street address and any additional information that would assist in finding the location of the problem.
 - iv. If you are standing by or have secured the location.

Supersedes Document Dated: 06/26/08	Authorized By: Director-Distribution Engrg. Services	Approved By: Pater L. H
		SVP- Network Strategy

APPLICABILITY:

This procedure applies to all personnel involved with or responsible for the inspection or maintenance of underground transmission and distribution facilities.

DEFINITIONS:

Desktop Computer: A personal computer that is connected to the National Grid network and used to download the Hand Held device and retrieve the information in the form of reports.

Elevated Equipment Voltage Test: An A.C. rms voltage difference between utility equipment and the earth, or to nearby grounded facilities that exceeds the highest perceptible voltage levels for humans.

Hand Held Computer: An electronic data recording device that is used in the field to create a record of conditions found.

Hand-Hole: An enclosure identified for use in underground systems, provided with an open or closed bottom, and sized to allow personnel to reach into, but not enter, for the purpose of installing, operating, or maintaining equipment or wiring or both.

Infrared Inspection: An inspection conducted to detect abnormal heating conditions associated with separable connectors. An infrared inspection is required before work begins in an enclosed space, enclosure, padmounted transformer or padmounted switchgear.

Inspector: A qualified worker who can identify deficiencies or non-standard construction conditions on National Grid facilities.

Manhole: An enclosure identified for use in underground systems, provided with an open or closed bottom, and sized to allow personnel to enter, for the purpose of installing, operating, or maintaining equipment or wiring or both.

Patrol: An assessment of National Grid facilities for the purpose of determining the condition of the facility and any associated components.

Secondary Splice Box: An enclosure identified for use in underground systems. A secondary splice box may be required where the customer's number of secondary cables exceeds the maximum allowed amount on the transformer.

Service Box: See Hand-hole

Submersible Equipment: Electric equipment such as transformers and switches that, are generally located within a Hand-hole, Manhole, or Vault.

URD: Underground Residential Distribution

UCD: Underground Commercial Distribution

Underground Distribution Facilities: Manholes, vaults, hand-holes and service boxes, padmounted equipment and the components and equipment contained in these structures. (See GENERAL INFORMATION above).

User: An individual who the program administrator has authorized to use the inspection reporting program.

Vault: An enclosure, above or below ground, which personnel may enter and which is used for the purpose of installing, operating, or maintaining equipment or wiring or both.

PROGRAM ADMINISTRATOR:

Distribution Engineering Services

SCOPE:

Underground Transmission and Distribution Facility Maintenance

- I. Patrols
- II. Equipment to be Inspected and Maintenance Codes
- III. Maintenance database
- IV. Maintenance Schedule
- V. Completion of Maintenance Codes
- VI. Responsibilities

I. PATROLS

1. New York

Inspection of underground equipment will be scheduled in such a manner that each underground facility will be examined once every five years. These patrols shall be completed by December 31st of the schedule year.

One-fifth of all underground utility components should be inspected each year. URD and UCD facilities shall be inspected on the existing overhead distribution circuit schedule. Additionally all riser poles are inspected in accordance with the Transmission and Distribution Overhead Inspection Programs, NG-USA EOP T007 and NG-USA EOP D004. Customer owned manholes and vaults that enclose National Grid equipment shall require the inspection of these National Grid facilities.

The Inspection group is responsible to create the patrol schedule for their respective Regions for the remainder of underground facilities. The Inspector uses a Windows based hand held computer to record region, district, employee ID, feeder number, structure ID number, GPS location, tax zone, line number, comments and maintenance problem codes. The Inspector while patrolling shall also complete the following maintenance codes if found deficient upon inspection: 602 – Handhole missing nomenclature, 617 – manhole missing nomenclature, 639 - network transformer- missing nomenclature, 660 – switchgear missing nomenclature, 681 – transformer missing nomenclature, and 707 – vaults improper nomenclature. The Inspector will input the code into the Windows based handheld as required, as well as completing the work unit in the handheld upon field completion while at the site. If the Inspector finds unmapped facilities from the information supplied from the Geographic Information System (GIS), refer to NG-USA EOP G011, Preparation and Distribution of Electric Facilities Records, for required procedure for corrections.

2. New Hampshire and Rhode Island

Inspection of designated underground equipment will be scheduled in such a manner that each designated Underground Facility will be examined once every five years. These patrols shall be completed by March 31^h of the fiscal year.

One-fifth of all metallic handholes, padmount transformers and switchgear shall be inspected annually. The metallic handhole covers shall be opened for a visual inspection. An external visual inspection shall be completed on the padmount transformers and switchgear. Additionally all separable components in the

metallic handholes are to be inspected by infrared. Refer to NG-USA EOP UG001 for infrared procedure. A "Level 1 Priority" shall be assigned to a temperature gradient greater than 20°, although it is recognized that consideration must be taken as to whether a customer outage will occur at this time and the negative impact the outage could have on the customer. This may require scheduling an outage with the customer within one week to satisfy this requirement. A "Level 2 Priority" shall be assigned to a temperature gradient between 10° and 20°. A "Level 3 Priority" shall be assigned to a temperature gradient less than 10°. Additionally, an elevated equipment voltage test shall be completed at each location, refer to NG-USA EOP-G016.

A working inspection on underground facilities is required for all manholes, vaults, handholes, splice boxes, junction boxes, padmount transformers, switchgear and submersible equipment, each time a crew performs work at one of these facilities. The format for data collected shall follow this EOP. All separable components in these facilities are to be inspected by infrared. Additionally an elevated equipment voltage test shall be completed at each location, refer to NG-USA EOP-G016.

All transmission riser poles are inspected in accordance with the Transmission NG-USA EOP-T007.

The Inspection group is responsible to create the patrol schedule for their respective Regions for the designated underground facilities. The Inspector uses a hand held computer to record region, district, employee ID, feeder number, structure ID number, GPS location, line number, comments and maintenance problem codes. The Inspector, while patrolling or crew while inspecting, shall also complete the following maintenance codes if found deficient upon inspection, 602 – Handhole missing nomenclature, 617 – manhole missing nomenclature, 639 - network transformer- missing nomenclature, 660 – switchgear missing nomenclature, 681 – transformer missing nomenclature, and 707 – vaults improper nomenclature. The Inspector will input the code into the Windows based handheld as required, as well as completing the work unit in the handheld upon field completion while at the site. If the Inspector finds unmapped facilities from the information supplied from GIS, refer to NG-USA EOP G011, Preparation and Distribution of Electric Facilities Records, for required procedure for corrections. Crews performing working inspections are to follow the same protocol for inspections by using either a handheld data entry unit or paper inspection logs requiring data entry by clerical support.

3. <u>Massachusetts</u>

Inspection of designated underground equipment will be scheduled in such a manner that each designated Underground Facility will be examined once every five years. These patrols shall be completed by March 31 of the fiscal year.

One-fifth of all manholes, vaults, metallic handholes, padmount transformers and switchgear shall be inspected annually. The metallic handhole covers shall be opened for a visual inspection. Manholes and vaults shall be opened and entered for inspection. An external visual inspection shall be completed on the padmount transformers and switchgear. Additionally all separable components in the metallic handholes, manholes, and vaults are to be inspected by infrared. Refer to NG-USA EOP UG001 for infrared procedure. A "Level 1 Priority" shall be assigned to a temperature gradient greater than 20°, although it is recognized that consideration must be taken as to whether a customer outage will occur at this time and the negative impact the outage could have on the customer. This may require scheduling an outage with the customer within one week to satisfy this requirement. A "Level 2 Priority" shall be assigned to a temperature gradient between 10° and 20°. A "Level 3 Priority" shall be assigned to a temperature gradient us a statisfy the existing the exist of the assigned to a temperature gradient between 10°. Additionally, an elevated equipment voltage test shall be completed at each location, refer to NG-USA EOP-G016.

A working inspection on underground facilities is required for all manholes, vaults, splice boxes, junction boxes, padmount transformers, switchgear and submersible equipment, each time a crew performs work at one of these facilities. The format for data collected shall follow this EOP. All separable components in these facilities are to be inspected by infrared. Additionally an elevated equipment voltage test shall be completed at each location, refer to NG-USA EOP-G016.

All transmission riser poles are inspected in accordance with the Transmission NG-USA EOP-T007.

The Inspection group responsible to create the patrol schedule for their respective Regions for the designated underground facilities. The Inspector uses a hand held computer to record region, district, employee ID, feeder number, structure ID number, GPS location, line number, comments and maintenance problem codes. The Inspector, while patrolling or crew while inspecting, shall also complete the following maintenance codes if found deficient upon inspection, 602 – Handhole missing nomenclature, 617 – manhole missing nomenclature, 639 - network transformer- missing nomenclature, 660 – switchgear missing nomenclature, 681 – transformer missing nomenclature, and 707 – vaults improper nomenclature. The Inspector will input the code into the Windows based handheld as required, as well as completing the work unit in the handheld upon field completion while at the site. If the Inspector finds unmapped facilities from the information supplied from GIS, refer to NG-USA EOP G011, Preparation and Distribution of Electric Facilities Records, for required procedure for corrections. Crews performing working inspections are to follow the same protocol for inspections by using either a handheld data entry unit or paper inspection logs requiring data entry by clerical support.

II. EQUIPMENT TO BE INSPECTED AND MAINTENANCE CODES

This EOP requires the visual inspection of the following facilities as designated above for New York, New Hampshire, Rhodes Island or Massachusetts, which require opening, and may require pumping on some items to assure a proper inspection:

- Manholes
- Vaults
- Handholes non-fiberglass
- Splice boxes non-fiberglass
- Junction boxes non-fiberglass
- Pad mount transformers
- Pad mount switchgears
- Submersible equipment
- Handholes fiberglass do not require opening
- Splice boxes fiberglass do not require opening
- Junction boxes fiberglass do not require opening

Maintenance Codes are shown on the Underground Field Survey Worksheet (Table 1). The Underground Field Survey Worksheet can be used by the field to record maintenance items and is used for informational purposes only. The latest transmission maintenance codes are downloaded to the Hand Held Computer each time there is a change that affects the maintenance code table contained in the Underground Maintenance Database. Printed copies of the latest maintenance code tables may be obtained by running a report on the look up tables from the Underground Maintenance Database.

Date: 08/17/09

INSPECTION PROGRAM AND MAINTENANCE CODES TABLE 1

	UNDERGROUND FIELD SURVEY WORKSHEET																	
DATE:				NSPEC	TOR NA	ME:					E	EMPLO	YEE	ID				
DIVISION	N		0	DISTRIC	т						F	FEEDER	R:					
TOWN:		STREET	<u>. </u>					MANHO		<u>, III T</u>	#		SI IE	FIX #	+			
TOWN.		SINELI					FOLL,		LL, V <i>P</i>		#		301		t			
Handhole	e Manhole	Net	Protect		Net X	FMR's		Switchg	lear		Trans	former						
Vault	Trench	Sut	omersible	•	Pull E	Box		Other	,		Equip	ment #						
MANHOL	LES, HANDHOLES, VA	AULT STRU	CTURES	3	EV	Test Re	quired:	Yes	No V	'oltag	e Actio	n Taker	า:	Repa	ired	De-e	energiz	ed
Water (in	hole) Yes No				EV	Found V	/oltage:	Yes	No	-							•	
	Can Manitar Deading	_				Alorm	Cattin	~										
-	Gas Monitor Readings Lower Explosive Li						or abo											
	Oxygen (0 ₂)).5, above	e.									
	Carbon Monoxide	(CO)				33 p			-									
	Hydrogen Sulfide (H₂S)				10	ppm											
		GIS				P/Q					SWITC	HGEAR	λ					P/Q
260 4 (N						/		F (NR)			e vegeta	ation						/
261 4 (N				S		/			Missin									/
	R) GIS equip/hardwa					/		P (NR)			omencla	ature						/
	R) GIS equip remove		move fro	m GIS		/		4 (NR)	Othe		aint Pee	line or						/
269 4 (N		HANDHOL	FS			/	002	4 (NR)	Rusi	eu/Pa		ANSFO	RM	=R				/
600 2 (N						/	672	1,2, 3 (R) Bu	shina		n/Crack		_1\				/
602 P (N						/		1, 2 ,3 (R				amaged		ecure	Э			/
603 1 (R)						/	675	675 1,2,3 (R) Elbows/tracking/burned			/							
604 4 (N	R) Other (use comm					/		676 F (NR) Excessive vegetation /			/							
		MANHOL	<u>E</u>					1(R) N										/
	R) Ground rods mis					/		P (NR)				ature						/
611 2 (R)) Cable/Joint leaking R) Cables bonded/gi					/		682 4 (NR) Mud/debris // 684 1,2 (NR) Oil Weeping //			/							
	B,4 (NR) Cracked/bro					/		685 1,2,3,4 (NR) Pad broken/damaged			/							
615 3 (R)		JKCH				/		4 (NR)				ds) dan		•				/
616 4 (N						/		4 (NR)			aint pee							/
617 P (N		ature				/		1, 2 (NR)			shed Of							/
620 2 (N						/						TREN	СН					
	3,4 (NR) Ring/cover					/			Expos									/
622 1, 4 (NR) Roof condition - NR) Chimney Condi					/	692	4 (NR)	Patr	1 – St	unken	VAUL	то					/
623 1,4 (624 4 (NI			ients			/	700	2 (NR)	Cabl	o mis	sing bo		13					/
625 1 (R)						/		1,2,3, 4 (/
	R) No Holes in Manh					/		1,2, 4 (N					ver					/
	NETW	VORK PRO	TECTOR					1,2, 4 (N										/
630 2 (R)		nage				/		1, 2 ,4 (N				ken lad	lder					/
632 1 (R)						/		706 1,2,3,4,P (NR) Improper grade 707 4,P (NR) Improper nomenclature			/							
633 2 (N				D		/					r nomer vorking)					/
635 2 (R)		ORK TRANS		11		1		4 (NR) 4 (NR)	<u> </u>		np brok							/
637 2 (R)						/					needs r							/
638 1 (NR) Missing ground			/		SUBMERSIBLE EQUIPMENT													
639 P (NR) Missing nomenclature			/	720	720 1,2,3,4 (R) Excess Corrosion			/										
642 1, 2 (R) Oil Weeping			/		721 1,2,3,4 (R) Physical damage /			/										
643 4 (N						/	722	1, 2 (R)	Leak	ing								/
		CHGEAR										ANOD	ES					
651 1, 2 ,3			nsecure			/			Missin									/
652 1,2,3		damaged				/	731	3 (NR)	Need	l repla	acemer							/
654 2 (R)		omogod				/		- Driarit		tit.		KEY						
656 1, 2 ,3	3 (R) Door Broken/Da	amayeu				/		= Priority = Maint.(Code N	iity /lav N	lot Dire	ctlv Affe	ect R	leliah				
								Maint. C										
							RP	= Maint.					nd H	las S	pecifi	c Pro	gram t	o Place
	1-						to /	Address										
Commen	TC.																	

III. MAINTENANCE DATABASE

The Maintenance database consists of data downloaded from the Windows based hand held and data entered from the desktop computer. The Windows based hand held used in the field, can be downloaded to any National Grid desk top computer that is connected to the network and the inspector is logged on as a valid user of the UG Maintenance program. The National Grid desktop computer is also used to generate various reports and work tickets depending on the user's need. These reports are utilized to schedule and accomplish distribution maintenance work.

IV. MAINTENANCE SCHEDULE

Maintenance activities are scheduled by priority Levels. All "Level 1 Priority" conditions identified must be repaired/corrected within 1 week. All "Level 2 Priority" conditions identified must be repaired/corrected within 1 year. All "Level 3 Priority" conditions must be repaired within 3 years. Level 4 Priority is for inventory purposes only.

Once the Underground Circuit/Feeder is completed in the Underground Maintenance Database, the Level 2 and Level 3 Priority maintenance codes are downloaded into STORMS. Expense maintenance work goes straight to scheduling while the capital work goes to Underground Engineering. Level 1 Priority maintenance codes are communicated by the Underground Inspector directly to the field operations group for the area where the feeder is located.

V. COMPLETION OF MAINTENANCE CODES

The completion of Level 1 priority maintenance codes is performed by the field operations Supervisor or their designee. Level 2 and Level 3 priority maintenance codes are completed in the Underground Maintenance database once the 699 requirement is completed in STORMS for the work request associated with the maintenance code.

ALL MAINTENANCE WORK IS TO BE COMPLETED PER NATIONAL GRID UNDERGROUND CONSTRUCTION STANDARDS.

VI. **RESPONSIBILITIES:**

Distribution Engineering Services

1. Update program as necessary.

Customer Operations

- 1. Ensure the Underground Maintenance Program as outlined in this EOP is implemented properly and timely.
- 2. Select circuits to be patrolled for a running five-year cycle and ensure that the circuits scheduled for patrol are completed each year.
- 3. Provide qualified personnel as the inspectors, to provide consistent and accurate identified maintenance concerns/problems.
- 4. Ensure program is completed annually as required.

Underground Inspector

- 1. Demonstrate the ability to identify maintenance concerns and the aptitude to become proficient in the use of a hand held computer and desktop computer.
- 2. Demonstrate the understanding and requirements of this EOP.
- 3. Possess the ability to do walking patrols, collect information on a hand held, download to a desk top computer, edit data, provide requested information/reports/work tickets to supervision, and track/close out work completed in the database.

Contract Management Services

- 1. At the request of Customer Operations/Distribution Network Strategy obtain, schedule and manage contractors to perform inspections and perform required maintenance.
- 2. Ensure the Underground Maintenance Program as outlined in this EOP is implemented properly and timely.
- 3. Provide inspectors where applicable.
- 4. Ensure inspectors are trained.
- 5. Provide program management.
- 6. Ensure program is completed annually as required.

Asset Strategy and Policy

- 1. Provide input into program revisions.
- 2. Provide program management.
- 3. Ensure program is completed annually as required.
- 4. Ensure the Underground Maintenance Program as outlined in this EOP is implemented properly and timely.

Process and Systems

1. Provide and support database.

T&D Technical Training

1. Provide training upon request.

REFERENCE:

NY PSC Order 04-M-0159

NY PSC Order Order Adopting Changes to Electric Safety Standard, December 2008 Applicable National Grid Safety Rules and Procedures Distribution Line Patrol and Maintenance NG-USA EOP D004 Elevated Equipment Voltage Testing NG USA EOP-G016 Transmission Line Patrol and Maintenance NG USA EOP – T007 Massachusetts DTE Directive 12/9/05

NG-USA EOP UG006

"Underground Inspection and Maintenance"

08/17/09

Changed levels from ABC to 1234 and added Underground Field Survey Worksheet.

Appendix 12

NG-USA PR 06.01.601.001 Transmission Line Maintenance Procedure

national grid	TRANSMISSION LINE MAINTENANCE PROCEDURE	Doc.# PR 06.01.601.001 Page 1 of 38
	Ground Based Visual Inspection	Version 2.1 - 02/03/2011

Ground Based Visual Inspection

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	TRANSMISSION LINE	Doc.# PR 06.01.601.001
national grid	MAINTENANCE PROCEDURE	Page 2 of 38
	Ground Based Visual Inspection	Version 2.1 – 02/03/2011

Revision History

Version	Date	Revision	Author	Reviewer	Approver
1.0	02/02/2010	Initial	J.M.McGrath		M.S.Browne
2.0	01/07/2011	Code changes, corrections	J.M.McGrath		M.S.Browne
2.1	2/3/2011	Code changes, warning sign revision, changed wood pole evaluation methodology	J.M.McGrath		M.S.Browne

Note: This document supersedes EOP T007 – Transmission Line Patrol and GL 06.01.118 – Visual Inspection of Transmission Line Assets

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TRANSMISSION LINE MAINTENANCE PROCEDURE

Ground Based Visual Inspection

	f Contents					
FORWA	RD					
1.0	General					
2.0	Administration	4				
3.0	Application	4				
4.0	References	4				
5.0	Definitions					
6.0	Follow Up Prioritization	5				
7.0	Documentation					
9.0	Responsibilities	6				
PROCE	DURÉ	8				
10.0	General	8				
11.0	Inspect Steel Condition					
12.0	Inspect Steel Grillage Foundation	8				
13.0	Inspect Concrete Foundation					
14.0	Inspect Wood Poles and Structures - Overall	9				
15.0	Inspect Wood Poles – Individual	9				
16.0	Inspect Steel Poles and Structures	10				
17.0	Inspect Conductor					
18.0	Inspect Insulators/Hardware					
19.0	Inspect Foundation – General	11				
20.0	Inspect Right of Way	11				
21.0	Inspect Miscellaneous	11				
22.0	Inspect Switch – Visual Inspection					
23.0	Document GIS Data Issues					
24.0	Engineering-Specific Inspection	12				
Appe	ndix A – Transmission Field Survey Worksheet	14				
	ndix B – Steel Evaluation Categories					
	ndix C – Concrete Evaluation Categories/Rating Matrix					
Appe	ndix D – Wood Poles and Structures Evaluation	18				
	ndix E – Individual Wood Pole Evaluation					
	Appendix F – Steel Poles and Structures Evaluation					
Appe	Appendix G – Conductor and Line Hardware Evaluation					
	ndix H – Foundation Evaluation					
	ndix I – ROW/Misc./Switch/GIS Evaluation					
Appe	ndix J – Complete List of Computapole Codes	37				

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File: PR 06.01.601.001 Ground Based Visual	Originating Department:	Sponsor:			
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FORWARD

1.0 General

- 1.1 The purpose of this procedure is to outline the requirements for the visual Inspection from ground level of National Grid US transmission circuits.
- 1.2 All applicable safety and environmental rules must be followed when executing these Inspections. Inspectors shall be aware of hazards that may be encountered.
- 1.3 Inspectors shall be notified by TLOME for all changes to this document and are to be trained yearly on this procedure. New Inspectors shall be trained on this document prior to performing this inspection.
- 1.4 This procedure is associated with Specification SP.06.01.601.000, Transmission Line Inspection and Maintenance.

2.0 Administration

- 2.1 Maintenance of this document is the responsibility of Transmission Line Operations and Maintenance Engineering (TLOME).
- 2.2 Specific planned work performed under this procedure will be coordinated by TLOME via a Work Plan document to be released prior to the start of each fiscal year.

3.0 Application

3.1 This document applies to all overhead line assets managed by National Grid US Transmission as defined by Transmission Group Procedure 12 (TGP 12) and applies to anyone performing Inspection and Maintenance activities on these assets. It is expected that this procedure be executed by Qualified Personnel as determined by training specific to the task performed.

4.0 References

- 4.1 Transmission Line Inspection and Maintenance Specification, SP.06.01.601.000
- 4.2 Transmission Line Switch Inspection Procedure, PR.06.01.601.008
- 4.3 Transmission Wood Pole Inspection and Treatment Procedure, PR.06.01.601.005
- 4.4 Transmission Steel Structure Foundation/Footer Inspection and Repair SP.06.01.601.004
- 4.5 National Grid Employee Safety Handbook

5.0 Definitions

5.1 Ground Based Visual Inspection – An Inspection performed from a stationary ground position. Movement along the line between Inspection points may be by vehicle or foot

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- 5.2 Hand Held Computer A data recording device that is used in the field to create a record of conditions found for the purposes of communicating this data to a Maintenance Management System
- 5.3 Inspection A careful viewing of assets to find defects and other problems that require Maintenance or monitoring
- 5.4 Inspection and Maintenance Program National Grid's planned program for Inspecting and Maintaining its transmission lines.
- 5.5 Inspector Qualified Personnel who identify defects via a specific type of Inspection
- 5.6 Maintenance Work to correct defects or other problems. This work is often generated through the Inspection process
- 5.7 Maintenance Management System (MMS) A computer application that schedules and tracks Inspections and/or Maintenance work
- 5.8 National Grid Representative National Grid personnel designated as the point of contact for a contracted inspector
- 5.9 Pocket A void in a pole resulting from damage, weathering or decay. This may lower the strength of the pole.
- 5.10 Qualified Personnel Personnel trained to safely perform a specific Inspection.
- 5.11 Work Plan A document published each fiscal year that, among other things, lists all Inspection and Maintenance scheduled for the year.

6.0 Follow Up Prioritization

- 6.1 Assets are to be assessed as follows:
 - All assets are to be graded based on worst critical member/location or discrete area, i.e. the weakest link of the asset.
 - Each steel structure, pole or member is to be graded according to Sections 10 and 11 of this procedure, using scales found in Appendix B, for engineering reference.
 - Each concrete foundation is to be graded according to Section 12 of this procedure, using scales found in Appendix C, for engineering reference.
 - Switches shall be inspected according to Procedure Section 21. Defects shall be assigned a Maintenance Priority Level of 1 to 4 per Appendix I.
 - All other assets shall be inspected according to the applicable section and defects found shall be assigned a Maintenance Priority Level of 1 to 4 in accordance with Appendices D-I.
- 6.2 Once reported, defects shall be repaired or addressed as follows per Transmission Line Inspection and Maintenance Specification, SP.06.01.601.000:
 - Level 1 Address within 1 week*
 - Level 2 Address within 6 months**
 - Level 3 Address within 3 years**
 - Level 4 Monitor condition or use for studies
 - * Time period starts on the day the problem is found

**Time period starts when the defect is entered into Computapole

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Inspection	Transmission Line O&M Engineering	Mark S. Browne

ed Visual Inspection Version 2.1 – 02/03/2011

- 6.3 Any exceptions to the grading guide below shall only be made with approval of TLOME. Any changes to levels already entered into Computapole shall only be made with approval of TLOME.
- 6.4 All Level 1 conditions shall be reported no later than two hours after discovery as follows:
 - New York Contact Transmission Control Center @ (315) 460-2110
 - New England Contact Transmission Control Center @ (800) 423-6029
 - Indicate problem found
 - Indicate circuit and structure number
 - Indicate street address and any additional information that would assist in identifying the location
 - Indicate if you are standing by or have safely secured the location
 - Indicate whether someone from In House Construction or Engineering is required for evaluation (immediate or not)
- 6.5 In cases where, in the judgment of the inspector, a serious safety issue may exist, the Inspector may be required to stand by a defect until other personnel arrive. This may be by the decision of the inspector or other groups. It is extremely important that the Inspector keep themselves and others a safe distance away from any hazards that are encountered. In such cases, the Safety group or National Grid Representative may also be advised.

7.0 Documentation

7.1 Information gathered from the Ground Based Visual Inspection shall be documented in the Computapole Maintenance Management System via the Hand Held Computer. If the computer isn't available, information can be temporarily documented on the Transmission Field Survey Worksheet in Appendix A.

8.0 Other Inspections

- 8.1 This document may be utilized in conjunction with other Inspections and condition assessments such as engineering walk-downs etc. by personnel not typically engaged in Inspections. If any defects are found that are considered Level 1, it is expected that Section 6 above shall be followed. All Level 1 and 2 defects found shall also be reported to the following:
 - Manager of TLOME, via phone or email, as soon as possible.
- 8.2 It is strongly encouraged that Level 1 and 2 defects found be evaluated by personnel from In House Construction or Transmission Inspections as soon as possible. This may not be necessary if the Inspection is being performed by someone with sufficient knowledge of transmission line construction that can fully understand the impact of the defect.

9.0 Responsibilities

9.1 <u>Transmission Line O&M Engineering</u>

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Inspection Transmission Line O&M Engineering Mark S. Browne							

TRANSMISSION LINE MAINTENANCE PROCEDURE Ground Based Visual Inspection

Version 2.1 – 02/03/2011

- Create the transmission line portion of the Work Plan outlining the circuits that are to be inspected and otherwise addressed according to this specification in a given fiscal year.
- Provide guidance and support for the execution of the Inspection and Maintenance Program
- Approve exceptions as noted above
- 9.2 <u>System Delivery</u>
 - Ensure the Inspection Program as outlined in the Fiscal Year Work Plan is safely executed according to this specification and its associated procedures in a timely manner.
 - Repair problems found during Inspection
- 9.3 <u>Transmission Inspections</u>
 - Provide National Grid Representative when contractors are used
 - Be qualified to perform specific Inspections and identify defects.
 - Be qualified to perform applicable basic Maintenance such as the installation of guy guards and stenciling.
 - Follow all applicable National Grid US Safety Rules.
 - Demonstrate the understanding and requirements of this specification and all related procedures and guidelines.
- 9.4 <u>Transmission Investment Management</u>
 - Track performance of Work Plan completion
 - Track performance of Maintenance within assigned priority level time frames
- 9.5 <u>Transmission Network Asset Strategy</u>
 - Provide input into program revisions.

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PROCEDURE

10.0 General

- 10.1 All assets must be physically visited and visually inspected so that all potential defects can be identified. Exceptions must have approval from the appropriate department manager and be documented in the Maintenance Management System.
- 10.2 The intent of this procedure is to visit assets in order as they physically exist in the field and apply the appropriate Inspection to each asset. To conform to the current Maintenance Management System input process, the steps in this procedure are arranged so as to line up numerically with the Computapole Maintenance priority codes.
- 10.3 All elements of this procedure are intended to be performed from ground level. Tools to facilitate a clear, close up view of assets, such as binoculars or scopes, should be used where necessary.
- 10.4 Some Computapole codes do not apply to this Inspection and are not included in this procedure. A complete list of Computapole codes including valid levels and STORMS qualifiers is in Appendix J.

11.0 Inspect Steel Condition

- 11.1 Grading Reference:
 - Appendix B Steel Evaluation Categories (1-6 Rating)
- 11.2 Inspection Note:
 - Grade all steel collectively. The overall tower rating shall be assigned as the visual rating of the worst 5% of members on the tower or discrete area on the steel pole, or the visual rating of the worst critical members, e.g. tower legs and insulator attachment points, whichever is worse.
 - Structures rated as 4 or worse will require additional review, so additional photos and notes should be taken to assist in structure evaluation.
 - At the discretion of the Inspector, any structure may be classified as 6 "Very Severe Deterioration" due to special circumstances. The reason for this must be reported in the Inspection report.
- 11.3 Visually inspect for the following:
 - Steel condition
 - Weathering steel for excessive corrosion of joints. Report any excessive corrosion of weathering steel joints to Transmission Line O&M Engineering.

12.0 Inspect Steel Grillage Foundation

- 12.1 Grading Reference:
 - Appendix B Steel Evaluation Categories (1-6 Rating)
- 12.2 Visually inspect for the following:
 - Steel condition above grade

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13.0 Inspect Concrete Foundation

- 13.1 Grading Reference:
 - Appendix C Concrete Evaluation (1-5 Rating)
- 13.2 Inspection Note:
 - At the Inspector's discretion, any structure foundation may be classified as 5: Very Severe Deterioration. The reason for this must be given in the Inspection report.
- 13.3 Visually inspect for the following:
 - Poor workmanship, including honeycombing
 - Cracking, including pattern or solitary cracks
 - Disintegration and deterioration of concrete
 - Distortion/movement resulting in change in alignment of structure components
 - Seepage movement of water/fluids through pores
 - Spalling development of fragments
 - Delamination
 - Degradation of steel/concrete interface
 - Excessive corrosion of reinforcement
 - Condition of anchor bolts. Ensure all hardware present and tight.

14.0 Inspect Wood Poles and Structures - Overall

- 14.1 Grading Reference:
 - Appendix D (Maintenance Priority Level 1-4 Rating)
- 14.2 Sound pole, visually inspect for the following and grade using the indicated code (note unless an immediate risk of failure exists, poles with visual rotting and/or hollow sound should be classified as a Level 4 and scheduled for a Wood Pole Inspection):
 - Code 510 Broken
 - Code 511 Visual rotting/hollow sounding pole
 - Code 512 Leaning
 - Code 513 Replace single arm
 - Code 514 Replace double arm
 - Code 515 Repair brace
 - Code 516 Replace brace
 - Code 517 Replace anchor
 - Code 518 Install anchor
 - Code 519 Repair/replace guy wire
 - Code 521 Tighten guy wire
 - Code 522 Replace guy shield
 - Code 524 Guy bonding
 - Code 525 Lightning damage
 - Code 526 Woodpecker damage
 - Code 527 Insects
 - Code 528 Aerial number missing

15.0 Inspect Wood Poles – Individual

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- 15.1 Grading Reference:
 - Appendix E (Maintenance Priority Level 1-4 Rating)
- 15.2 Note: A C-Truss repair is not considered a temporary repair. However, if a pole with a C-Truss is significantly deteriorated, it shall be graded as if no C-Truss was installed.
- 15.3 Identify via badge left after Wood Pole Groundline Inspection. Use only Level 4 and are meant to be a documentation of pole labeling that results from the Wood Pole Groundline Inspection:
 - Code 901 Identified priority pole
 - Code 902 Identified reject pole
 - Code 903 Excessive checking
 - Code 904 Climbing inspection required
 - Code 905 No inspection tag

16.0 Inspect Steel Poles and Structures

- 16.1 Grading Reference:
 - Appendix F (Maintenance Priority Level 1-4 Rating)
- 16.2 Visually inspect for the following and grade using the indicated code:
 - Code 531 Broken legs
 - Code 532 Aerial number missing
 - Code 534 Loose or missing bolts/hardware
 - Code 535 Anti climb equipment damaged/missing
 - Code 536 Vegetation on tower
 - Code 537 Structure damage
 - Code 538 Tower needs straightening
 - Code 539 Arms damaged

17.0 Inspect Conductor

- 17.1 Grading Reference:
 - Appendix G (Maintenance Priority Level 1-4 Rating)
- 17.2 Note: TLOME may revise levels for conductor damage based on factors such as mechanical and electrical loading.
- 17.3 Visually inspect for the following and grade using the indicated code:
 - Code 541 Conductor condition overall
 - Code 542 Static wire condition overall
 - Code 543 Ground wire condition overall
 - Code 544 Sleeve/splice/connector condition
 - Code 546 Clearance issues

18.0 Inspect Insulators/Hardware

- 18.1 Grading Reference:
 - Appendix G (Maintenance Priority Level 1-4 Rating)
- 18.2 Note Where multiple strings of insulators are encountered, each string shall be evaluated on its own.

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File: PR 06.01.601.001 Ground Based Visual Originating Department: Sponsor:							
Inspection Transmission Line O&M Engineering Mark S. Browne							



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Version 2.1 – 02/03/2011

- 18.3 Visually inspect for the following and grade using the indicated code:
 - Code 551 Insulator damage
 - Code 552 Insulators out of plumb
 - Code 553 Hardware loose or damaged
 - Code 555 Lightning arrestor issues

19.0 Inspect Foundation – General

- 19.1 Grading Reference:
 - Appendix H (Maintenance Priority Level 1-4 Rating)
- 19.2 Visually inspect for the following and grade using the indicated code:
 - Code 563 Erosion

20.0 Inspect Right of Way

- 20.1 Grading Reference:
 - Appendix I (Maintenance Priority Level 1-4 Rating)
 - All Code 574 Danger Trees rated as an "F"
- 20.2 Visually inspect for the following and grade using the indicated code:
 - Code 571 Erosion
 - Code 572 Encroachments
 - Code 573 Debris
 - Code 574 Danger trees
 - Code 575 Broken gates
 - Code 576 Oil/Gas/Hazmat leak

21.0 Inspect Miscellaneous

- 21.1 Grading Reference:
 - Appendix I (Maintenance Priority Level 1-4 Rating)
- 21.2 Visually inspect for the following and grade using the indicated code:
 - Code 581 Structure not marked ground level
 - Code 582 Switch damaged (see below)
 - Code 583 Switch ground damaged (see below)
 - Code 584 Install warning sign
 - Code 585 Replace warning sign
 - Code 586 Remove steps
 - Code 587 Add dirt and tamp
 - Code 589 Bird Nest
 - Code 590 Excessive bird perching

22.0 Inspect Switch – Visual Inspection

- 22.1 Grading Reference:
 - Appendix I (Maintenance Priority Level 1-4 Rating)
- 22.2 Inspection Note:
 - This inspection can be performed from the ground with the switch in service. Refer to the Line Switch Inspection Procedure, PR06.01.601.008 for further

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Version 2.1 – 02/03/2011

information. Since one code is used for most of this inspection, note problem details.

- Visually inspect for the following and grade using the indicated code: 22.3
 - Code 582 Noise Arcing and other abnormal noise, if energized. If • disconnect switches are making unusual noises while energized, leave the area immediately and contact the appropriate control center.
 - Code 582 Insulators Surface contamination, tracing, damaged porcelain
 - Code 582 Primary Connections Discoloration of or heat rising from connections (overheating), cracks, visibly loose connections
 - Code 582 Live Parts Blades properly turned into jaws (horizontal), damaged or misaligned arcing horns, damaged, misaligned or missing parts
 - Code 582 Load break interrupters Damage or deterioration
 - Code 582 Operating mechanism Properly locked, operating pipe for breakage, bending, phase to phase linkage for breakage, bending, manual operating mechanism for damage, deterioration or missing parts
 - Code 583 Operating mechanism properly grounded

23.0 Document GIS Data Issues

- 23.1 Grading Reference:
 - Appendix I (Maintenance Priority Level 1-4 Rating)
- 23.2 Document all mismatches between the GIS and the field as follows:
 - Code 760 GIS map mismatch
 - Code 761 GIS equipment stencil mismatch •
 - Code 762 GIS equipment/hardware missing •
 - Code 763 GIS equipment removed in field
 - Code 769 GIS other GPS/GIS errors

24.0 Engineering-Specific Inspection

- This section contains additional guidelines for Inspections related to engineering 24.1 activities and is not to be included in the regular Ground Based Visual Inspection. The guidelines presented below shall be used by engineers completing and interpreting field Inspections as part of preliminary engineering as specified in SP.06.01.101 "Transmission Engineering and Design Services".
- 24.2 The sum total of the guidance provided in sections 9 through 23 shall be used in completing engineering analysis of lines.
- 24.3 Notes on Priority Codes
 - Priority 1 Reserved for immediate and substantial threats to public safety • and/or system reliability. These should generally be very rare
 - Priority 2 Items which require repair due to a near term risk of failure, the repairs should not wait for the normal two-year project life cycle
 - Priority 3 Repairs are required, but a more deliberate approach can be taken over a two-year period

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ion Version 2.1 – 02/03/2011

- Priority 4 Repairs should be completed if the work is incidental to another project, but the item can wait for the next Inspection cycle for further assessment
- 24.4 The following features or defects shall be determined and documented:
 - Asset Information
 - Structure Number
 - Circuit
 - Tower/Pole ID# including circuit according to National Grid
 nomenclature
 - Tower/Pole Location in Latitude/Longitude format
 - Tower/Pole Groundline elevation
 - Structure location (City/Town and State)
 - Visual Inspection
 - Year Installed
 - Tower/Pole Height
 - Structure Height
 - Structure Type
 - Structure Description (painted/galvanized/weathered/foundation)
 - Structure condition(s) and overall rating
 - Presence of steel distress or deterioration
 - Concrete foundation condition(s) and overall rating
 - Presence of concrete foundation distress or deterioration
 - Concrete foundation surface mapping diagram
 - Mechanical or fire damage
 - Broken hardware such as insulators or adversely impacted structural components such as foundations
 - Adjacent roads, railroads, parks, and other areas considered frequently accessible by the general public
 - Any unusual conditions or safety hazards
 - Digital photographs
 - Field sketches of foundation condition

25.0 Temporary Repairs

- 25.1 Some defects encountered may have been repaired temporarily. These defects shall be inspected monthly by Transmission Inspections, until a permanent repair is completed.
- 25.2 If an Inspector encounters a temporary repair, the defect shall still be reported with a note indicating a temporary repair.

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Appendix A – Transmission Field Survey Worksheet

	TRAN	ISMISS	SION FIEL	D SURVEY V	VORKSHE	ET			
Patrolled Circuit/No.	Unique ID			Pole/Towe		Voltage	Distr	rict	
Additional Circuit/No.	Unique ID								
					Dete				
Area	Between			Rd.	Date	Employee ID			
	And			_Rd.					
ТҮРЕ	A) Single	B) H	I. Frame	C) 3 Pole	D) 4 Pole	E) 5 P	ole	F) 6 F	ole
	G) Flex-Tower	H) S	Square-Tower	C) 3 Pole r I) Hai	irpin	J) Othe	er	,	
MATERIAL	A) Wood (fill in	n informat	ion for each p	oole, i.e., 2 pole, 3 p	pole, 4 pole, etc	c.)			
	Year Last Treat	Class	S Treatm	Year Set ent A) External	B) Internal C	Nanufacturer Both D) Other	E) U	nknown	
	F) None	B) 5	Steel	C) L	attice		L) 01		
						o	0.1		
CONFIGURATION	Deadend (Circle One)	Tangent	Switch	Structure Da	wit Arm		Oth e One)	er	
STEEL/LATTICE		56		FOUNDATION:	STEEL			4 5 6	
CONDITION					CONCRETE	1 2	3	4 5	
POLE *		Sub.	Priority		CONDUCTO	R **		Circuit	Priority
*Enter Sub No. if a Multip	le Structure	No.	Qty	**Enter Circu	it No. if More T		le	No.	Qty
510 1, 2 (R) Broken			/	541 1,2, 3 (R) C					/
511 1,4 (RP) Visual Rotting 512 1,2,3,4 (R) Leaning			/	542 1,2, 3 (R) 543 1,2, 3 (R) 0					/
513 1,2,3 (R) Replace Single	e Arms		/	543 1,2, 3 (R) 544 1,2, 3 (R) 544 1,2, 3 (R) 544 544 1,2,3 (R) 544 544 544 544 544 544 544 544 544 54					/
514 1,2, 3 (R) Replace Doub			/	546 1, 4 (NR) L					/
515 1,2,3 (R) Repair Braces			/			NE HARDWARE			
516 1,2,3 (R) Replace Brace			/	551 1,2, 3 ,4 (R)		n			/
517 1,2 (R) Replace Anche 518 1,2,3,4 (R) Install Ancho			/	552 4 (R) Insulator Plumb 553 1,2,3,4 (R) Hardware Dam			/		
519 1,2,3 (R) Repair/Replac			/	555 2 (R) Light		11			/
521 2,3 (R) Tighten Guy Wire	e duy wile		/		FOUNE	DATION - GENER	RAL		/
522 P (NR) Replace/Install C			/	563 1,2, 3 ,4 (R)					/
524 4 (R) Guy Not Bonded			/						
525 1,2,3,4 (RP) Lightning D			/						
526 2,3,4 (RP) Woodpecker 527 2,4 (RP) Insects	Damage			571 1,2, 4 (NR)		IGHT OF WAY			/
528 4 (NR) Aerial Number M	issina		/	572 4 (NR) En					/
	TOWER			573 4 (NR) De	bris				/
531 1,2 (R) Tower Legs Brok			/	574 F (R) Dan					/
532 4 (NR) Aerial Numbers N 534 1,2,3 (R) Loose Bolts/Ha	Aissing		/	575 4 (NR) Ga 576 4 (NR) Oil					/
535 4 (NR) Repair Anti-Cli			/		/Gas Leak				/
536 F (R) Vegetation On Tov	ver		/		MI	SCELLANEOUS			
537 1,2,3 (R) Structure Dam	lage		/	581 4,P (NR) S	stencil/Line/ Stru	uct No. Ground le	evel		/
538 1,2,3,4 (R) Straighten To	wor		1	582 1,2, 3 ,4 (R)	Switch Domo	bor			/
539 1,2, 3 ,4 (R) Arms Damag			/		aged Ground	Jeu			/
	INSPECTION		,	584 4 , P (NR) I		Warning Sign			/
901 4 (RP) Identified Priority			/	586 4 (NR) Re					/
902 4 (RP) Identified Reject			/		ld Dirt & Tamp				/
903 4 (RP) Excess Checking 904 4 (RP) Climbing Inspect			/	589 1,3,4 (R) B 590 4 (R) Bird I	Perching				/
905 4 (RP) No Inspection Ta			/		Clothing	GIS	I		/
	-				S Map Doesn't	Match Field			/
NR=Maint. Code may not direc					S Equip. Stenci				1
R=Maint. Code may affect relia RP = Maintenance Code may a				762 4 (NR) GI 763 4 (NR) GI	<u>S Equip/Hardwards Equip</u>				/
specific program in place to add				Remove from GI					/
				769 4 (NR) GI		IS Errors			/
Comments on rear of sheet									

NG0237 (12/09)

Appendix B – Steel Evaluation Categories



<u>Visual Rating 6 – Very Severe Deterioration</u> Perforated Element – severe physical damage



<u>Visual Rating 5 – Significant Pitting</u> Significant pitting – loss of section clearly visible, edges feathered/thinned



<u>Visual Rating 4 – Light Pitting</u> Some very light edge roughening. Loss of greater majority of coating and zinc layers. Corroded surface would dominate surface preparation – remedial action using wire brush, scraper and brushed paint not sufficient to give greatly increase life



Visual Rating 3 – Light Corrosion Very light surface corrosion, majority of coating intact



<u>Visual Rating 2 – Intact</u> Paint coating over all surface – overcoat may not be intact and some very small areas (<1%) of light corrosion may be present. Galvanizing intact except for some very small areas (<1%) of light corrosion



Visual Rating 1 – Serviceable Fully painted – overcoat and undercoat intact Fully galvanized – coating intact

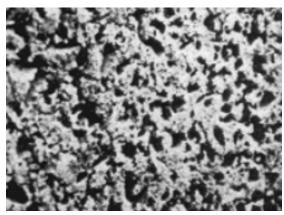
Appendix C – Concrete Evaluation Categories/Rating Matrix



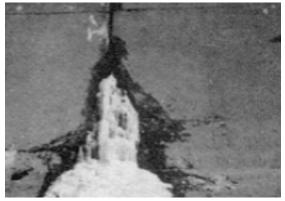
Honeycombing Construction faults, poor workmanship



Pattern Cracking



Disintegration Deterioration of concrete into small fragments



Seepage Movement of water or other fluids through pores

Distortion or Movement Change in alignment of the components of a structure



Erosion/Abrasion



Spalling Development of fragments

Delamination Degradation of steel/concrete interface

		Overall Foundation Rating				
		Very Severe Deterioration	Severe Deterioration	Medium Deterioration	Light Deterioration	Serviceable
		5	4	3	2	1
	Cracking	Wide cracks (over 0.08" width)	Medium Cracks (between 0.04" and 0.08" width)	Fine Cracks (0.04" width)	Negligible	Negligible
Concrete Foundation Condition Categories	Disintegration	Very Severe Disintegration (loss of mortar and coarse aggregate at a depth greater than 0.8")	Severe Disintegration (loss or mortar between 0.4" and 0.8" around coarse aggregate)	Medium Disintegration (loss of surface mortar between 0.2" and 0.4" and exposure of coarse aggregate)	Light Disintegration (no exposure of coarse aggregate)	Negligible
	Spalling	Large spall (greater than 0.8" in depth and greater than 6" in any dimension)	Small spall (not greater than 0.8" in depth or greater than 6" in any dimension)	Negligible	Negligible	Negligible

Typical Pole Defects		
Bark Inclusion	Checking (Solitary)	Checking (Around Periphery of Pole)
		48
The growth of the main stem around a dead branch	The separation of fibers parallel to the grain and extending towards the center of the pole	Multiple checks around entire pole circumference
Cross Break	Mechanical Damage	Split
The separation of fibers perpendicular or at an angle to the grain	Transportation and erection damage due to machinery such as chainsaws or cranes	The cracking of a pole due to mechanical connections or the intersection of checks
Dead Streak	Decay	Decay Knot
The growth of the main stem around the dead wood	The softening of the pole due to fungal growth	Knots which have decayed and can extend towards the center of the pole
Pocket		
A Solitary Check, a series of checks at one location, or area of decay at the surface of the wood pole		

Appendix D – Wood Poles and Structures Evaluation

510 Pole – Broken								
 Used when pole is broken due to impact, stress etc. 								
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4					
Damage poses significant risk of imminent failure	Damage is not an immediate threat to the integrity of the network or to public safety	N/A	N/A					
511 Pole – Visual Rotting								
Used for physical data (checking, dead streak, bar	mage which compromises k inclusion, cross break,							
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4					
Damage poses significant risk of imminent failure	N/A	N/A	All Others					
512 Pole – Leaning								
Used when pole/structure is out of plumb(excludes raked angle structures which are intentionally out of plumb due to line angle)								
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4					
		4						

		Mar and Mar	
Leaning pole which in Inspector's judgment poses immediate and substantial threat to public safety and/or system reliability	Pole top deflection in Inspector's judgment poses a near-term risk to structure integrity	Slope > 2" per 10' pole height	All other leaning poles

13 Pole – Replace Sin			
	single arms. Arm refers t to support the conductor.	to any horizontal member	extending out from the
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Arm damage poses immediate and substantial threat to public safety and/or system reliability	Substantial damage to cross section of arm causing the arm to deflect – failure may occur under non-extreme loading	Appreciable damage – failure may occur under extreme loading	N/A
514 Pole – Replace Do			
Used for damaged			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Arm damage poses immediate and substantial threat to public safety and/or system reliability	Substantial damage to cross section of arm causing the arm to deflect – failure may occur under non-extreme loading	Appreciable damage – failure may occur under extreme loading	N/A
515 Pole – Repair Brac			
• Used for damage structure.	to braces. Braces refer to i	intermediate members that	t connect parts of the
Priority Level 1	Priority Level 2	Priority Level 3	
			Priority Level 4
Brace damage poses immediate and substantial threat to public safety and/or system reliability	Substantial damage to cross section of brace causing the arm to deflect – failure may occur under non-extreme loading	Appreciable damage – failure may occur under extreme loading	Priority Level 4
immediate and substantial threat to public safety and/or system reliability	Substantial damage to cross section of brace causing the arm to deflect – failure may occur under non-extreme loading	Appreciable damage – failure may occur under	
immediate and substantial threat to public safety and/or system reliability 516 Pole – Replace Bra • Used for damage	Substantial damage to cross section of brace causing the arm to deflect – failure may occur under non-extreme loading aces to braces or missing brace	Appreciable damage – failure may occur under extreme loading	N/A
immediate and substantial threat to public safety and/or system reliability 516 Pole – Replace Bra	Substantial damage to cross section of brace causing the arm to deflect – failure may occur under non-extreme loading aces to braces or missing brace	Appreciable damage – failure may occur under extreme loading	N/A

I lood for damago	to anchor rod or head or p	ull out of the anchor	
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Guy failure poses immediate and substantial threat to public safety and/or system reliability	Anchor rod has corroded substantially or is broken, or anchor has pulled out and is no longer functioning as a structural member, or a guy should be present but is not	Appreciable damage – failure may occur under extreme loading	Superficial damage – bu will not fail in 5 years
518 Pole – Install Anch	or		
	sary anchor is missing		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Damage poses immediate and substantial threat to public safety and/or system reliability	Damage is not an immediate threat to the integrity of the network or to public safety	N/A	N/A
519 Pole – Repair/Repl	ace Guv Wire		
• Used when a gui			
need of repair or replace	ement	ware, included fiberglass	
		ware, included fiberglass Priority Level 3	or wood rods, are in Priority Level 4
need of repair or replace	ement	-	
need of repair or replace Priority Level 1 Guy failure poses immediate and substantial threat to public safety and/or	Guy is broken or seriously compromised (e.g. broken strands)	Priority Level 3 Guy is currently structurally sound, but has been compromised by corrosion, damage,	Priority Level 4
need of repair or replace Priority Level 1 Guy failure poses immediate and substantial threat to public safety and/or system reliability 521 Pole – Tighten Guy	Guy is broken or seriously compromised (e.g. broken strands)	Priority Level 3 Guy is currently structurally sound, but has been compromised by corrosion, damage, etc.	Priority Level 4 N/A
need of repair or replace Priority Level 1 Guy failure poses immediate and substantial threat to public safety and/or system reliability 521 Pole – Tighten Guy	Guy is broken or seriously compromised (e.g. broken strands)	Priority Level 3 Guy is currently structurally sound, but has been compromised by corrosion, damage, etc.	Priority Level 4 N/A

 <u>522 Pole – Replace Guy Shield</u> Used when guy shield is damaged. Inspector should install a new one. 				
	All Priority Lev	el "P" Perform		
524 Pole – Guy Not Bo	nded			
	ond is inadequate or missir	•		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
N/A	N/A	N/A	Guy not bonded	
525 Pole – Lightning Da	amage			
•	damaged due to lightning	•		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
Damage in Inspector's judgment poses immediate and substantial threat to public safety and/or system reliability Non-serviceable Damage Serviceable Damage Superficial Damage				
526 Pole – Woodpecke • Used when pole is	damaged by woodpecker	s creating nests in pole		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
	Se dia		age	
N/A	Several Large (>5") Diameter Holes	Single Large (>5") Diameter Holes	Several Small (<5") Diameter Holes	

527 Pole – Insects					
 Used when pole is 	 Used when pole is damaged by insects 				
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
Damage poses significant risk of imminent failure	N/A	N/A	All other noticeable damage		
528 Pole – Aerial Numb	er Missing				
Used when aerial	numbers are not installed	where required			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	N/A	N/A	Aerial numbers are required at all road crossing, all structures ending in zero, and the first and last structures of a line.		

<u> Appendix E –</u>	Individual Wood	Pole Evaluation

901 Osmose – Identifie	901 Osmose – Identified Priority Pole			
Used to document pole identified as a priority reject on Wood Pole Groundline Inspection				
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
N/A	N1/A	N1/A	All	
N/A	N/A	N/A	All	
902 Osmose – Identifie	d Reject Pole			
 Used to document 	pole identified as a reject	on Wood Pole Groundline	e Inspection	
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
N/A	N/A Executive Obself (net re	N/A	All	
	Excessive Check (not re			
 Used to document Inspection 	pole identified as having	excessive checking on wo	bod Pole Ground Line	
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
-				
N/A	N/A	N/A	All	
	g Inspection Required (n			
	pole identified as needing	g a climbing inspection on	Wood Pole Ground Line	
Inspection Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
N/A	N/A	N/A	All	
905 Osmose – No Inspection Tag				
 Used to document 	pole that has no evidence	e of prior Wood Pole Inspe	ections. Not required for	
poles under 10 years old	l.			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
N1/A	NI/A	NI/A	A II	
N/A	N/A	N/A	All	

Appendix F – Steel Poles and Structures Evaluation

 531 Tower – Tower Legs Broken Used when tower legs are broken 			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Leg damage which in Inspector's judgment poses immediate and substantial threat to public safety and/or system reliability 532 Tower – Aerial Nun	Leg damage which in Inspector's judgment poses a near-term risk to structure integrity nber Missing	N/A	N/A
	numbers are not installed		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
N/A	N/A	N/A	Aerial numbers are required at all road crossing, all structures ending in zero, and the first and last structures of a line.
<u>534 Tower – Loose Bol</u>			
	sing connections on hardv		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Missing connections on			
members in judgment of Inspector pose an immediate and substantial threat to public safety and/or system reliability	Missing connections	Loose Connections	N/A
535 Tower – Repair Ant	ti-Climb		
Used to repair anti			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
N/A	N/A	N/A	Anti-climbing device needs repair
536 Tower – Vegetation		rom towor	
Usea when vegeta	tion needs to be cleared f	rom tower	
	All Priority Leve	el "F" - Forestry	

537 Tower – Structure Damage			
 Used for broken, bent or missing members on tower 			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
	1 de la compañía de		
Damage in judgment of Inspector poses and immediate and substantial threat to public safety and/or system reliability	Broken or nearly broken members	Damage/Excessive bending on minor members	N/A
538 Tower – Straighten	<u>Tower</u>		
	er is out of alignment		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Leaning tower in judgment of Inspector poses immediate and substantial threat to public safety and/or system reliability	Substantial deflection, near-term risk to structural stability	Appreciable deflection, ability of tower to sustain extreme loading conditions may be compromised	Aesthetic only
539 Tower – Arms Dam	naged		
 Used when the arr 	ms on a tower are damage	ed	
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Damaged arms in Inspector's judgment pose an immediate and substantial threat to public safety and/or system reliability	Arm damage poses a risk of failure under routine loading e.g. a near term risk of failure	Arm damage poses a risk of failure under heavy loading	Superficial damage only

541 Conductor – Bird Caging (Add comment – Bird Caging)			
	onductor bird caging.		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
N/A	N/A	N/A	Bird Caging
541 Conductor – Br	oken (Add comment – I	Broken Conductor)	
		based on an engineering e	valuation of factors such
		and Above	
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Any broken conducto	rs N/A	N/A	N/A
		and Below	
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Significant percentage broken strands	of Small percentage o broken strands	f N/A	N/A

Appendix G – Conductor and Line Hardware Evaluation

542 Conductor – Static

• Used to rate static wire damage.

• Note: TLOME may revise priority levels based on an engineering evaluation of factors such as mechanical and electrical loading.

230kV and Above			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Any broken conductors	N/A	N/A	N/A
	115kV and		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Sand Sand Sand Sand Sand Sand Sand Sand			
Significant percentage of broken strands	Small percentage of broken strands	Exterior damage which does not pose a near- term threat	N/A

543 Conductor – Ground Wire				
Used for any damage to the ground leads on the structure				
Priority Level 1 Priority Level 2 Priority Level 3 Priority Level 4				
Ground wire damage in judgment of Inspector poses an immediate and substantial threat to public safety and/or system reliability; this includes a loose ground wire near the top of the pole which may be a risk to contact the conductor	Ground wire missing or disconnected/broken on 3 or more adjacent structures	Ground wire missing or disconnected/broken on isolated structures only, or ground wire is loose near the base of the pole where there is no risk of contacting the conductor	N/A	
544 Conductor – Sleeve Used for damage t	<u>e/Connector</u> to splices or connectors on	the shield/static wire or co	onductors	
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
Failure in judgment of Inspector poses an immediate and substantial threat to public safety and/or system reliability	Visible physical damage to connector/splice/conductor	Visible corrosion at splice/connector	N/A	
546 Conductor – Under	<u>· 25 Feet</u>			
	ard clearances and conduc			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
Conductor poses significant risk of danger to the public	N/A	N/A	General Guidelines by Voltage: • 69kV – 115kV 25 ft • 230kV – 345kV 30 ft Clearances must meet requirements of latest National Electric Safety Code, as well as local requirements (e.g. MA CMR	

551 Line Hardware – Insulator Damage

• Used for chipped or broken insulators.

• Insulators that are physically separated are always Level 1 NOTE: A chipped or cracked insulator (porcelain damage does not reach more than ½ way to the center of the insulator) may not be counted as a damaged insulator if damage is not severe. This is up to the inspector's discretion.

Number of		Number of Damaged Insulators per String					
Insulators in							
String	Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4			
Any	Any Physical Separation	N/A	N/A	N/A			
5	2 or more	1	N/A	N/A			
6	2 or more	1	N/A	N/A			
7	3 or more	2	1	N/A			
8	3 or more	2	1	N/A			
9	3 or more	2	1	N/A			
10	4 or more	3	2	1			
11	4 or more	3	2	1			
12	4 or more	3	2	1			
13	4 or more	3	2	1			
14	5 or more	3 or 4	2	1			
15	5 or more	4	2 or 3	1			
16	5 or more	4	2 or 3	1			
17	6 or more	4 or 5	2 or 3	1			
18	6 or more	4 or 5	2 or 3	1			
19	6 or more	4 or 5	3	2 or less			
20	6 or more	5	3 or 4	2 or less			
21	7 or more	5 or 6	3 or 4	2 or less			

Broken Insulators



552 Line Hardware – Insulator Plumb



Separated Insulators



JJZ LINE Haruware - III					
 Used for insulators unintentionally out of plumb 					
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	N/A	N/A	Usually a sign of high amplitude conductor movement, galloping.		

553 Line Hardware – Hardware Damage				
 Used for any dama 	age to other line hardware			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
Hardware damage in Inspector's judgment poses and immediate and substantial risk to public safety and/or system reliability	Structural Hardware damage which poses a near-term risk to structural integrity	Structural Hardware damage, e.g. damaged connections	Cosmetic Damage	
555 Line Hardware – Li	ghtning Arrestor			
 Used when a lightr 	ning arrestor is damaged or	has failed		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4	
N/A	Arrestor has failed. Lightning arrestors fail by disconnecting and falling away from the conductor	N/A	N/A	

Appendix H – Foundation Evaluation

563 Foundation – Erosion					
 Used for any erosi 	on around foundations				
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
Erosion in Inspector's judgment poses and immediate and substantial risk to public safety and/or system reliability	Erosion is compromising structural integrity	Structure not yet at risk, but erosion appears to be progressing at a significant rate	Small erosion, may eventually become significant		

Appendix I – ROW/Misc./Switch/GIS Evaluation

571 Right of Way – Erosion					
 Used for any overa 	all erosion in ROW				
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
Erosion exposes counterpoise and presents a significant danger to public and/or vehicular traffic	Erosion exposes counterpoise and presents a danger to public	N/A	Any other ROW erosion, i.e. washed out road or culverts		
572 Right of Way - Encroachments					
 Used for any unap 	proved use of ROW or thin	ngs too close to lines			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	N/A	N/A	O7/31/2006 Any encroachments		
573 Right of Way – Deb	oris				
 Used for any debri 			-		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	N/A	N/A	Any debris in ROW blocking access		
574 Right of Way – Dar	nger Tree				
	er trees adjacent to lines RANSMISSION FOREST	RY	-		
	cal or Lateral Clearance				
23 – 46kV 69kV 115kV 230kV	4' or less 6' or less 10' or less 14' or less	All Priority Level "F" - Forestry			
015111					
345kV	18' or less				
575 Right of Way – Gat	18' or less				
575 Right of Way – Gat • Used for broken R	18' or less <u>e Broken</u> OW gates				
 575 Right of Way – Gat Used for broken R Priority Level 1 	18' or less <u>e Broken</u> OW gates Priority Level 2	Priority Level 3	Priority Level 4		
575 Right of Way – Gat • Used for broken R Priority Level 1 N/A	18' or less e Broken OW gates Priority Level 2 N/A	Priority Level 3 N/A	Priority Level 4 Broken gate		
 575 Right of Way – Gat Used for broken R Priority Level 1 N/A 576 Right of Way – Oil/ Used for any oil, gat 	18' or less e Broken OW gates Priority Level 2 N/A	N/A	Broken gate		
 575 Right of Way – Gat ● Used for broken R Priority Level 1 N/A 576 Right of Way – Oil/ 	18' or less <u>e Broken</u> OW gates Priority Level 2 N/A Gas Leak	N/A	Broken gate		

581 Misc – Stencil Line/Structure Number at Ground					
• Used when line/structu	Used when line/structure number is missing. Inspector to stencil structure				
Priority Level 1	Priority Level 2	Priority Level P	Priority Level 4		
N/A	N/A	Inspector stencils number	Inspector cannot stencil number		
581 Misc – Stencil Line	/Structure Number at Gr	ound			
 Used when line/str 	-	. Inspector to stencil struc	ture.		
		el "P" - Perform			
582 Misc – Switch Dam					
Used when switch	•		Dui a vitu I a val 4		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
Visible arcing is present or condition could result in immediate failure.	Switch may fail, burning and other evidence of arcing	Switch may not be able to be operated, but likely won't fail and put the line out of service	Insignificant damage		
583 Misc – Damaged St					
Used for damaged	•				
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	Ground grid is exposed or lead is damaged	N/A	N/A		
584 Misc – Install/Repla	ace Warning Sign				
 Used for damaged structures (2 signs total). 		. Warning signs required	on both sides of all		
Priority Level 1	Priority Level 2	Priority Level P	Priority Level 4		
N/A	Install warning signs at all structures that are adjacent to roads, regularly traveled pedestrian thoroughfares, or places where persons frequently gather (such as schools or public playgrounds)	Sign installed/replaced by Inspector	Install/replace signs at a low risk location where public interaction is not likely.		
585 Misc – Replace Sig					
Used for missing a	erial structure signs. Aeri	ial circuit and structure ID ctures of a line, and all stru			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	N/A	N/A	Install/replace signs		
586 Misc – Remove Ste					
 Steps must be rem 	noved at least 10' from the	e ground line			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	N/A	N/A	Remove steps		

587 Misc – Add Dirt an			
 Used on poles wh 	en fill dirt is insufficient		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
N/A	N/A	Structure may be weakened by absence of tamped dirt around base	Dirt and tamping required around base of pole

589 Misc – Bird Nest			
Used when bird ne	sts are found on line		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
Bird nest in Inspector's judgment poses and immediate and substantial risk to public safety and/or system reliability	N/A	Limited risk of bird contact but nest should be removed	No risk of contact such as very small nests or those at bottom of structure
589 Misc – Bird Perchir			
· · · · · · · · · · · · · · · · · · ·	rching could lead to probl		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
N/A	N/A	N/A	Birds perching on line or evidence of bird perching on line
760 GIS – Map Does No	t Match Field		·
Used when GIS ma	ap does not match field		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4
N/A	N/A	N/A	Note error

761 GIS – Equipment Stenciling in Error in GIS					
 Used when equips 	nent labels do not match (GIS			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	N/A	N/A	Note error		
762 GIS – Equipment/H	ardware Missing in GIS				
 Used when equipm 	nent is missing on GIS		_		
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	N/A	N/A	Note error		
763 GIS – Equipment R	emoved in Field, Remov	ve from GIS			
 Used when equipm 	nent has been removed in	field but not on GIS			
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	N/A	N/A	Note error		

769 GIS – Other GPS/GIS Errors					
Used for all other GIS errors					
Priority Level 1	Priority Level 2	Priority Level 3	Priority Level 4		
N/A	N/A	N/A	Note error		

			Default	Valid
Code	Description	CAP/EXP	Default Level	Levels
501	OSMOSE - Identified priority pole	С	3	2
502	OSMOSE - Identified reject pole	С	3	3
503	OSMOSE - Insp excessive check (not rej)	С	4	4
504	OSMOSE - Climbing Insp re'q (not rej)	С	4	4
901	OSMOSE - Identified priority pole	E	4	4
902	OSMOSE - Identified reject pole	E	4	4
903	OSMOSE - Insp excessive check (not rej)	E	4	4
904	OSMOSE - Climbing Insp re'q (not rej)	E	4	4
510	POLE - Broken	С	2	12
511	POLE - Visual Rotting	С	3	14
512	POLE - Leaning	E	4	1234
513	POLE - Replace Single Arms	С	3	123
514	POLE - Replace Double Arms	С	3	123
515	POLE - Repair Braces	E	3	123
516	POLE - Replace Braces	E	3	123
517	POLE - Replace Anchor	E	2	12
518	POLE - Install Anchor	С	3	1234
519	POLE - Repair/Replace Guy Wire	E	3	123
521	POLE - Tighten Guy Wire	E	3	23
522	POLE - Replace/Install Guy Shield	E	Р	Р
524	POLE - Guy Not Bonded	E	4	4
525	POLE - Lightning Damage	С	3	1234
526	POLE - Woodpecker Damage	E	3	234
527	POLE - Insects	E	3	14
528	POLE - Aerial Number Missing	E	4	4
531	TOWER - Tower Legs Broken	E	2	12
532	TOWER - Aerial number Missing	E	4	4
534	TOWER - Loose Bolts/Hard	E	3	123
535	TOWER - Repair Anti-Climb	E	4	4
536	TOWER - Vegetation on Tower	E	F	F
537	TOWER - Structure Damage	E	3	123
538	TOWER - Straighten Tower	E	3	1234
539	TOWER - Arms Damaged	E	3	1234
540	CONDUCTOR - Infrared Problem	E	3	123
541	CONDUCTOR - Conductor	E	3	123
542	CONDUCTOR - Static	E	3	123
543	CONDUCTOR - Ground Wire	E	3	123
544	CONDUCTOR - Sleeve/Conn	E	3	123
546	CONDUCTOR - Under 25 ft	Е	4	14
547	Infrared Problem Identified	Е	2	124
552	LINE HDW - Insulator Plumb	Е	4	4
553	LINE HDW - Hardware Dam	Е	3	1234
555	LINE HDW - Lightning Arrestor	С	2	2
556	LINE HDW - Infrared Problem	С	3	123
563	FOUNDATION - Erosion	Е	3	1234
571	RIGHT OF WAY - Erosion	Е	4	124
572	RIGHT OF WAY - Encroachments	Е	4	4
573	RIGHT OF WAY - Debris	Е	4	4
574	RIGHT OF WAY - Danger Tree	Е	F	F
575	RIGHT OF WAY - Gate Broke	E	4	4

Appendix J – Complete List of Computapole Codes

Code	Description	CAP/EXP	Default Level	Valid Levels
576	RIGHT OF WAY - Oil/Gas Leak	E	4	4
581	MISC - Stencil Lin/Struct num at ground	E	Р	4,P
582	MISC - Switch Damaged	E	3	1234
583	MISC - Damaged Switch Ground	E	2	2
584	MISC - Install/Replace Warning Sign	E	4	4P
585	MISC - Replace Signs	E	4	4
586	MISC - Remove Steps	E	4	4
587	MISC - Add Dirt and Tamp	E	3	34
588	Switch - Infrared Problem	E	3	123
589	MISC - Bird Nest	E	3	134
590	MISC - Bird Perching	E	4	4
760	GIS - Map Doesn't Match Field	E	4	4
761	GIS - Equip. Stenciling In Error	E	4	4
762	GIS - Equip/Hardware Missing GIS - Equip. Removed In Field	E	4	4
764	Remove from GIS	E	4	4
769	GIS - Other GPS/GIS Errors	E	4	4

<u>Notes</u>

- 1. All Level 1 codes do not enter STORMS. The expectation is that the situation will be reported immediately, work complete within a week and a confirming work order used to track costs.
- 2. All Level 2 and 3 codes pass through STORMS and Design
- 3. All Level P codes imply that work was done by the inspector to correct defect
- 4. All Level F codes go to Forestry
- 5. All Level 4 codes are for notation only, they do not enter STORMS
- 6. All codes marked "E" are expense
- 7. All codes marked "C" are capex

Appendix 13

NG-USA EOP G017 Street Light Standard Inspection Program

national grid	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G017
	GENERAL	Page 1 of 8
	STREET LIGHT STANDARD INSPECTION PROGRAM	Version 1.0 - 02/16/10

INTRODUCTION

The purpose of this procedure is to outline the requirements for the inspection cycle for Street Light Standard installations owned by National Grid.

The inspection shall include identifying and reporting the physical condition of street lighting equipment on street lighting standards. Street lights attached to wood poles are inspected as part of the Overhead Distribution Inspection Patrol covered by NG-USA EOP D004.

All street lighting equipment will be inspected for physical damage, potentially hazardous conditions or obvious deterioration.

Inspections will be recorded on a Windows® based hand held computer. The maintenance items identified during this inspection will be separated into four priority levels 1, 2, 3, and 4. The problem codes identified default to the appropriate level. The default level can be adjusted by the individual performing the inspection based on actual field conditions. These priority levels are defined as follows:

Level 1- An identified facility/component or tree condition that must be repaired/replaced within 1 week.

Level 2 - Identified facility/component condition that must be repaired/replaced within 1 year.

Level 3 – Identified facility/component condition that must be repaired/replaced within 3 years.

Level 4 – This priority category is to collect inventory information on actual field conditions to be used by Investment Strategy and Work Planning.

All Level 1 priority conditions identified in the field shall be called in by the Inspector as follows:

- 1. Notification by location:
 - a. New York: contact System Operations Dispatch 1-877-716-4996.
 - b. NE North: Westboro Control Center 1-508-389-9032.
 - c. NE South: Lincoln Control Center 1-401-335-6075.
- 2. Detailed information provided to the regional notification location:
 - a. Identify yourself as a Company Inspector and your work reporting area.
 - b. Details of the Level 1 Priority Condition:
 - i. Problem found.
 - ii. District, Feeder No., Line No., Tax District and Pole No.
 - iii. Street address and any additional information that would assist in finding the location of the problem.
 - iv. If you are standing by or have secured the location.
- 3. Notification to area Inspections Supervisor for follow-up.

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PROGRAM	Distribution Engineering Services	Patrick Hogan			

national grid	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G017
	GENERAL	Page 2 of 8
	STREET LIGHT STANDARD INSPECTION PROGRAM	Version 1.0 - 02/16/10

Equipment will be inspected on a five year cycle such that one-fifth of the inspections should be scheduled on an established annual basis.

PURPOSE

This procedure applies to all personnel involved with or responsible for the inspection and maintenance of street lighting standards and associated facilities owned by National Grid.

ACCOUNTABILITY

- 1. Distribution Engineering Services
 - A. Update program as necessary
 - B. Provide field support and training as requested.
- 2. Customer Operations
 - A. Provide qualified personnel as the distribution inspectors, to provide consistent and accurate ` data or to contact Contract Management Services for contracting where applicable.
- 3. Distribution Inspector
 - A. Demonstrate the ability to identify maintenance items and the aptitude to become proficient in the use of a hand held computer and desktop computer.
 - B. Demonstrate the understanding and requirements of this National Grid EOP.
 - C. Possess the ability to do patrols, collect information on a hand held, down load to a desktop computer, edit data, provide requested information/reports/work tickets to supervision, and track/close out work completed in the database.
 Provide gualified persented to inspect where applied be.

Provide qualified personnel to inspect where applicable.

- D. Ensure all inspectors have been trained.
- 4. Contract Management Services
 - A. At the request of Customer Operations/Distribution Network Strategy obtain, schedule and manage contractors to perform inspections and perform required maintenance.
- 5. Network Asset Strategy
 - A. Provide input into program revisions.
 - B. Ensure the program as outlined in this EOP is completed each year.
 - C. To develop and/or revise a five-year inspection schedule of all facilities covered by this EOP.
 - D. Develop Outdoor Lighting Asset Strategy
- 6. Process and Systems
 - A. Provide and support database.

COORDINATION

Not Applicable

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PROGRAM		Distribution Engineering Services	Patrick Hogan		

REFERENCES

Applicable National Grid Safety Rules and Procedures NY PSC Order 04-M-0159 NY PSC Order Order Adopting Changes to Electric Safety Standard, December 2008 Elevated Equipment Voltage NG-USA EOP G016

DEFINITIONS

Patrol: A walking assessment of distribution facilities for the purpose of determining the condition of the facility and it's associated components.

Hand Held Computer: A portable, self-contained electronic data recording device used to create a record of conditions found in the field.

Inspector: A qualified employee or contractor who can identify deficiencies, or non-standard construction conditions, on the Company's street light facilities.

Valid User: An individual who has been authorized to use the Street Lighting Maintenance Program by the Program Administrator.

Street Light Standard: A metallic or fiberglass shaft and arm assembly which supports street lighting luminaire(s) and associated wiring.

TRAINING

T&D Technical Training - Provide training upon request.

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PROGRAM	Distribution Engineering Services	Patrick Hogan

DOCUMENT CONTENTS

Table of Contents

1.0	STREET LIGHT PATROLS	5
2.0	EQUIPMENT TO BE INSPECTED AND MAINTENANCE CODES	5
3.0	STREET LIGHT MAINTENANCE DATABASE/REPORTS	7
4.0	MAINTENANCE SCHEDULE	7
5.0	COMPLETION	7
6.0	REVISION HISTORY	8

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	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G017
national grid	GENERAL	Page 5 of 8
STREET LIGHT STANDA	STREET LIGHT STANDARD INSPECTION PROGRAM	Version 1.0 - 02/16/10

1.0 STREET LIGHT PATROLS

Street Lighting inspections will be performed as patrols and are conducted by a street light qualified worker. The patrols are scheduled in such a manner that street lighting facilities are inspected once every five years. The Outdoor Lighting group is responsible for creating and/or revising this schedule for the respective geographic areas. The Distribution Inspector uses a Windows® based hand held computer to record employee ID, region, district, street lighting installation standard number, GPS location, Priority Level 1, 2, 3 and 4 maintenance items, and comments. The listing of these maintenance items are shown in Table I. Any new facilities added to the system will be incorporated through our Customer Service System – Outdoor Lighting (CSS-OL) database and added to the appropriate inspection cycle. The street light standards inspections scheduled for the year shall be completed by December 31st. The inspector shall place the CSS-OL street light standard number on the facility if not found numbered during the patrol.

2.0 EQUIPMENT TO BE INSPECTED AND MAINTENANCE CODES

- 2.1 Luminaires
- 2.2 Arms
- 2.3 Standards
- 2.4 Foundations
- 2.5 Conductor

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ELECTRIC OPERATING PROCEDURE GENERAL STREET LIGHT STANDARD INSPECTION PROGRAM

Doc. # NG-EOP G017

TABLE I

Default Priority Category CODE Description Luminaire 300 2 Light "ON" Day 2 Replace Lens 301 302 4 Clean 303 4 Paint 304 4 Replace Wattage Label 305 1 Wires Exposed 2 Damaged - Replace 306 Missing 307 4 4 Other - Comments 308 320 2 Damaged - Replace Arm 321 4 Damaged - Repair 322 4 Rust - Paint 323 4 Other - Comments Standard 330 2 Structure Damage - Replace 331 Damaged/Leaning - Repair 4 332 4 Paint/Maintenance 333 1 Access Cover - Replace 334 4 Bad Wiring - Repair 335 4 Stencil Required 2 Temporary Overhead * 336 337 2 Ground - Repair 338 4 Knockdown/Missing 339 4 Other - Comments 350 Damaged/Leaning - Repair Foundation 4 351 4 Anchor Bolts Damaged 352 4 Elevated - Repair 4 Other - Comments 353

PRIORITY 1, 2 and 3 MAINTENANCE ITEMS FOR OUTDOOR LIGHTING

Note: The default priority of Level 4 for missing luminaries and street light standards is utilized for informational use only. If the street light standard is missing or missing a luminaire, the item shall be reviewed with records, if found to be a required and an active asset it shall be changed to a Level 1 priority.

*Refer to EOP NG-EOP G029 (Tracking Temporary Repairs to Electric System) for tracking and reporting of temporary repairs.

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3.0 STREET LIGHT MAINTENANCE DATABASE/REPORTS

The Street Light Maintenance Data Base consists of records downloaded from the hand held computers and information entered from the desktop computers. The records can be downloaded to the database through any desktop computer that is connected to the network and the inspector is logged on as a valid user of the Street Light Standard Inspection program. The desktop computer is also used to generate various reports and work tickets, depending on the user's need. These reports/work tickets are utilized to schedule and accomplish distribution maintenance work.

4.0 MAINTENANCE SCHEDULE

Maintenance activities are scheduled by priority Levels. All "Level 1 Priority" conditions identified must be repaired/corrected within 1 week. All "Level 2 Priority" conditions identified must be repaired/corrected within 1 year. All "Level 3 Priority" conditions must be repaired within 3 years. Level 4 Priority is for inventory purposes only.

Once the Street Light Patrol is completed in the Street Light Maintenance Database or 21 days have elapsed since the inspection, the Level 2 and Level 3 Priority maintenance codes are downloaded into STORMS. Expense maintenance work goes straight to scheduling while the capital work goes to Distribution Design. Level 1 Priority maintenance codes are communicated by the Distribution Inspector directly to the field operations group for the area where the feeder is located.

5.0 COMPLETION

The completion of Level 1 priority maintenance codes is performed by the field operations Supervisor or their designee. Level 2 and Level 3 priority maintenance codes are tracked in the Street Light Maintenance database and placed into the Customer Service System – Outdoor Lighting (CSS-OL) database. CSS-OL database automatically initiates a STORMS order. CSS-OL database is updated once the associated STORMS orders are complete for the work request associated with the maintenance code from the Street Light Database.

ALL MAINTENANCE WORK IS TO BE COMPLETED PER NATIONAL GRID DISTRIBUTION STANDARDS.

ALL MAINTENANCE WORK PREFORMED THAT WAS IDENTIFIED ON THE WORK ORDER OR DISCOVERED DURING THE REPLACEMENT/REPAIR/CORRECTION OF THE ORGINAL MAINTENANCE PROBLEM MUST BE LISTED ON THE DATABASE AND THEN CLOSED OUT WHEN COMPLETE

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		ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G017
national	arid	GENERAL	Page 8 of 8
hational grid	STREET LIGHT STANDARD INSPECTION PROGRAM	Version 1.0 - 02/16/10	

6.0 REVISION HISTORY

Version 1.0 Date 02/16/10

Description of Revision This document supercedes document dated 07/25/05.

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Appendix 14

NG-USA EOP G004 Shock Complaints

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G004
national grid	GENERAL	Page 1 of 7
	Shock Complaints	Version 1.0 – 07/14/11

INTRODUCTION

This procedure describes the requirements for investigating and reporting on a customer's shock complaint. A shock complaint is a customer call that states a person has received a shock. When investigating of a shock complaint, Company field personnel must determine if the shock was caused by faulty customer equipment, a neutral-to-earth voltage associated with the Company's distribution system, or an external DC voltage source. Regardless of the cause, a shock complaint is considered an emergency and shall be dispatched as soon as possible. The appropriate Dispatch or Control Center shall be notified of all shock incidents by the field, and all communications shall be completed as required by National Grid Electric Operating Procedure NG-EOP G009.

PURPOSE

This document details specific steps that should be followed when National Grid receives a shock complaint call.

ACCOUNTABILITY

- 1. Distribution Engineering Services
 - A. Update procedure as necessary
- 2. Operations
 - A. Ensure that this procedure is understood and implemented
 - B. Ensure that all personal are trained in this procedure.
- 3. Employee
 - A. Demonstrate the understanding of this procedure.
 - B. Comply with the requirements of this procedure.

COORDINATION

N/A

REFERENCES

National Grid Employee Safety Handbook

National Grid Safety and Health Policies & Procedures

NG-USA EOP G003 Shock and/or Neutral-to-Earth Voltage Complaint

NG-EOP G009 Personal Injury Accidents/Newsworthy Event Reports

Metering Services Department Procedure MS505 Shock Complaint

Metering Services Department Procedure MS508 Warning Tag Electric

National Grid OH Construction Standards

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	Distribution Engineering Services	Susan Fleck

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G004
national grid	GENERAL	Page 2 of 7
	Shock Complaints	Version 1.0 – 07/14/11

DEFINITIONS

Shock Voltage: Voltage between two points that is high enough to be perceptible to people.

Primary Voltage: All distribution circuit cables or conductors energized at 4, 15, 23, or 34.5 kV.

Shall: The word shall is to be understood as mandatory.

Should: The word should is understood as recommended.

TRAINING

Provide line personnel with training, through progression schools and as necessary.

DOCUMENT CONTENTS

Table of Contents

1.0	SAFETY	.2
2.0	ORDER PROCESSING	.2
3.0	INVESTIGATION	.3
4.0	REVISION HISTORY	.7

1.0 SAFETY

- 1.1 All work shall be performed in accordance with the National Grid Employee Safety Handbook and all appropriate National Grid Electric Operating Procedures.
- 1.2 All appropriate Personal Protective Equipment including, but not limited to, hard hat, safety glasses/eye protection, rubber protective equipment, appropriate footwear and FR clothing shall be worn when performing work as required by the National Grid Employee Safety Handbook and applicable work procedures.

2.0 ORDER PROCESSING

- 2.1 Regardless of the cause, all shock complaints are considered an emergency order type that requires immediate dispatch. When the Customer Contact Center (CCC) receives a call from a customer stating that a person has received a shock, the CCC:
 - 2.1.1 Immediately transfers to Dispatch any calls from 911 officials with an associated emergency or life threatening situation.

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	Distribution Engineering Services	Susan Fleck		

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G004
national grid	GENERAL	Page 3 of 7
2.1929	Shock Complaints	Version 1.0 – 07/14/11

- 2.1.2 Retrieve the customer's account information and verify the customer's account information on the <u>Account</u> window.
- 2.1.3 Inform the customer that someone needs to be present at the premise in order for the shock complaint to be investigated. Inform the customer that their service may be disconnected if no one is present at the premise and a problem is detected.
- 2.1.4 Complete the <u>Issue Investigation Order for Account</u> or a <u>Service Order Form</u> (paper copy) in its entirety and fax the completed form to the appropriate dispatch office when the Customer Service System is down.
- 2.1.5 Call Dispatch office to verify receipt the Investigation Order or the Faxed Service Order.

3.0 INVESTIGATION

- 3.1 The individual investigating (generally a field service representative) a shock complaint shall:
 - 3.1.1 Initiate Shock and/or Neutral to Earth Voltage Complaint Investigation Form NG0024 (Exhibit 1) <u>http://infonetus/formscatalogweb/forms/NG0024.pdf</u>

Use this form on **every** shock complaint order, even when the individual conducting the investigation resolves the problem him/herself without involving outside departments.

- 3.1.2 Make the first check with a National Grid approved testing device between a known ground source and the origin of the shock.
- 3.1.3 If the test between the ground and the shock source indicates higher than secondary voltages:
 - a. Safely evacuate customer(s) from the premise.
 - b. Contact Customer Meter Services Supervisor and System Operations Dispatch from a remote location and request Electric Operations assistance.
 - c. Safeguard and keep the hazardous area clear until Electric Operations provides relief.
- 3.1.4 If the test between ground and the source of the shock indicates secondary or lower voltages:
 - a. Connect an AC multi-range voltmeter (such as Fluke 87) that provides true RMS at the same location and observe the readings. Leave the voltmeter connected at this location.
 - b. Check for proper bonding. If additional bonding is required, assist or advise the customer accordingly.
 - c. Open the customer's main breaker(s)/fuse(s), remove the meter and observe the voltmeter.

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File: NG-EOP G004 Shock Complaints MGA Originating Department: Sponsor:				
	Distribution Engineering Services	Susan Fleck		

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G004
national grid	GENERAL	Page 4 of 7
2.1929	Shock Complaints	Version 1.0 – 07/14/11

1.	f voltage drops to zero, the problem is within the customer's
	equipment.

- i. Reinstall meter and close main breaker(s)/fuse(s).
- ii. Isolate the trouble circuit by opening each breaker/fuse one at a time until the voltage reading on the voltmeter drops to zero.
- iii. Identify equipment and wiring on troubled circuit.
- iv. Isolate and disconnect troubled equipment or wiring and issue an Electric Warning Tag Form NG0023 (Exhibit 2). <u>http://infonetus/formscatalogweb/forms/NG0023.pdf</u>
- v. The individual conducting the investigation shall inform the customer to contact a licensed electrician or appliance repair person to check out internal wiring or appliances.
- vi. Record this information on the Shock and/or Neutral to Earth Voltage Complaint Investigation Form NG0024 (Exhibit 1).
- 2. If the voltage does not drop to zero, each customer on the same secondary shall be disconnected in the same manner as above. Any other customers in close proximity and with a common water supply may also have to be checked. In each case, the voltmeter should remain connected at the original complaint's premise.
- 3. If voltage is still present after steps 1 & 2 have been completed, it will be necessary to determine if the condition is the result of a neutral-toearth AC source or a DC voltage. Connect the AC-DC multi-range voltmeter that provides true RMS and use the DC scale to observe readings:
 - i. If DC voltage is measured, the problem is with a DC source (i.e., cable TV, telephone). Inform the customer that the problem is with a source that National Grid cannot correct or check.
 - ii. Record this information on the Shock and/or Neutral to Earth Voltage Complaint Investigation Form NG0024 (Exhibit 1).
 - iii. Notify Communications Companies.
- 4. If voltage is still present after steps 1 & 2 have been completed and the voltage is AC:
 - i. Further investigation is required by the Engineering Lab in NE or the Meter and Test Department in NY as per Electric Operating Procedure G003 – Shock and/or Neutral-to-Earth Voltage Complaint.
 - ii. Record this information on the Shock and/or Neutral to Earth Voltage Complaint Investigation Form NG0024 (Exhibit 1) and forward to the Engineering Lab in NE or the Meter and Test Department in NY.

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	Distribution Engineering Services	Susan Fleck		

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G004
national grid	GENERAL	Page 5 of 7
	Shock Complaints	Version 1.0 – 07/14/11

EXHIBIT 1

"Shock and/or Neutral-to-Earth Voltage Complaint Investigation Report" (Form #NG0024) http://infonetus/formscatalogweb/forms/NG0024.pdf

SHOCK AND/OR NEUTRAL TO EARTH VOLTAGE COMPLAINT INVESTIGATION REPORT

nationalgrid

Customers's Name		Phone
Street, Road, Etc.	Circuit	Pole or Enclosure
City, Town, Village		

TEST LOCATION SKETCH

CIRCUIT	A.C. 1	Volts	D.C. Volts		
CONFIGURATION	As Found	As Left	As Found	As Left	CORRECTIVE ACTION
lormal					
Meter Removed					
REMARKS					

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	Distribution Engineering Services	Susan Fleck		

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G004
national grid	GENERAL	Page 6 of 7
1.000	Shock Complaints	Version 1.0 – 07/14/11

EXHIBIT 2 "Warning Notice" Form #NG0023 http://infonetus/formscatalogweb/forms/NG0023.pdf

WARNING NOTICE

TO OUR CUSTOMER

In response to your request we have inspected your electrical installation and found the cause of your service failure to be as follows:

-	Short in
	Defective
	. Overloaded Branch Circuit
	General Overload

_____ Over-fused Branch Circuits

NOTE: Replacing of blown fuses will not correct the trouble listed above.

We recommend that you call your:

_____ Electrical Contractor

_____ Appliance Repairman

to make the necessary repairs.

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SERVICE REP

DATE _

NG0023(01.06)

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	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G004
national grid	GENERAL	Page 7 of 7
	Shock Complaints	Version 1.0 – 07/14/11

4.0 REVISION HISTORY

Version
1.0Date
07/14/11Description of Revision
This document supersedes document dated 02/01/07.

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Appendix 15

NG-USA SMS 400.06.1 Substation V&O Inspection Standard and SMP 400.06.2 Substation Inspection Procedure

	SUBSTATION MAINTENANCE	Doc. # SMS 400.06.1
national grid	Standard	Page 1 of 4
	Visual and Operational Inspection (V&O)	Version 2.0 – 06/30/09

INTRODUCTION

Substation Inspection or Visual and Operational (V&O) Inspection of each Substation and Switchyard is a key element in the National Grid USA preventive maintenance program. V&O Inspections are performed with the apparatus in service and are designed to detect abnormal conditions before the apparatus is damaged or a customer outage occurs. Data collected during the V&O Inspection is one of the elements used by AIMMS to prioritize individual apparatus for complete and diagnostic inspections.

PURPOSE

N/A

ACCOUNTABILITY

N/A

COORDINATION

N/A

REFERENCES

N/A

DEFINITIONS

N/A

TRAINING

N/A

DOCUMENT CONTENTS

Table of Contents

1.0	SCHEDULE	2
	PROBLEMS AND DISCREPANCIES	
3.0	V&O GUIDELINES	2
4.0	REVISION HISTORY	3

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	Substation O&M Services	Donald T. Angell	

	SUBSTATION MAINTENANCE	Doc. # SMS 400.06.1
national grid	Standard	Page 2 of 4
	Visual and Operational Inspection (V&O)	Version 2.0 – 06/30/09

1.0 SCHEDULE

1.1 Each transmission and distribution substation and switchyard will have a V&O Inspection at least bimonthly.

2.0 PROBLEMS AND DISCREPANCIES

- 2.1 Severe Trouble shall be reported to the responsible Control Center and the person in charge of the substation immediately.
 - 2.1.1 The employee shall secure the area and warn unauthorized people to stay clear of the danger.
 - 2.1.2 A severe trouble condition is a situation that is hazardous to the system operation and/or National Grid employees or the public.
- 2.2 Problems and discrepancies found should be repaired during the V&O Inspection whenever possible.
- 2.3 Problems and discrepancies not corrected during the V&O Inspection shall be recorded on the Inspection Card (Apparatus Inspections) or as a note in the PDA (Station V&O Inspections).
 - 2.3.1 The Supervisor reviewing the inspection shall generate follow-up work orders to document the required work.

3.0 V&O GUIDELINES

- 3.1 To provide uniform and effective V&O Inspections throughout National Grid, the Substation Maintenance Standards and Procedures Books should be referenced for detailed information on the inspection of each type of apparatus.
 - 3.1.1 Some of the typical items to be checked include: air, hydraulic and gas pressures, operation counters, oil levels and temperatures, and visual condition.
- 3.2 The station should be inspected for cracked or broken line terminators, bus supports and post insulators, heat discolored wire and wire terminations and blown surge arresters. All fuses and disconnects should be checked for proper seating and heat discoloration.
- 3.3 Alarm and communication radios operation should be verified. The telephones should be checked for proper operation.
- 3.4 Station Service secondary supplies should be checked alive and transfer switches checked for correct position.
- 3.5 Structures and foundations should be inspected for deterioration, damage and paint condition.
- 3.6 Substation security measures must be checked for proper operation and signs of unauthorized entry. This includes: fencing, gates, warning signs, entry alarms, locks and chains.
- 3.7 General substation housekeeping should also be taken care of.

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4.0 REVISION HISTORY

<u>Version</u>	Date	Description of Revision
1.0	12/26/06	Corrected - Formatting Changed - Header title, Document number prefix Changed - First page footer to reference Documentum Removed – Subtitle Added – AIMMS PM numbers
1.1	05/23/07	Document Added - Documentum Version # to headers Added - File name to footer
1.2	08/20/07	Problems And Discrepancies Added - Section
2.0	06/30/09	Converted to new EDO format - content unchanged

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File: SMS 400.06.1 Visual and Operational Inspection	Originating Department:	Sponsor:	
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	SUBSTATION MAINTENANCE	Doc. # SMS 400.06.1
national grid	Standard	Page 4 of 4
	Visual and Operational Inspection (V&O)	Version 2.0 – 06/30/09

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SUBSTATION MAINTENANCE PROCEDURE

SMP 400.06.2 Version 1.7 Date 09/30/2008 Page 1 of 16

VISUAL AND OPERATIONAL (V&O) INSPECTION

INTRODUCTION

This procedure describes the methods used to perform Visual and Operational (V&O) Inspections of electrical substations used in the transmission and distribution of electricity.

PURPOSE

V&O Inspections, are performed with the apparatus in service, and are used to:

Verify the security of fences, gates etc. that prevent entry of the public, and provide a legal record of their inspection.

Detect any hazards to company employees or the public.

- Verify that animal protection measures are present and in good condition.
- Detect abnormal conditions before the apparatus is damaged or a customer outage occurs.
- Collect data (counter readings, fault operations etc.) used to prioritize individual apparatus inspections.
- Collect data (regulator travels, load readings, relay targets etc.) used for system operation purposes.

ACCOUNTABILITY

Substation and other Supervisors supervising inspection and maintenance activities.

Substation and other Workers performing inspection and maintenance activities.

REFERENCES

National Grid USA Safety Handbook

SMS 400.13.1 Oil Leak Reporting Procedure

SMS 400.08.1 Trouble Reporting Procedure

EP-14 Oil Filled Electrical Equipment Management

Manufacturer's Installation, Operating, and Maintenance manuals for the specific equipment to be inspected.

Manufacturer's operating manuals for the specific test equipment to be used.

SMP 400.06.2 v1.7 VISUAL AND OPERATIONAL (V&O) INSPECTION 09/30/2008

PROCEDURE CONTENTS

Table of Contents

1.	TEST EQUIPMENT REQUIRED	2
2.	Materials Required.	2
3.	INITIAL SUBSTATION ENTRY	2
4.	INSPECT YARD	3
5.	NOTIFY THE SYSTEM OPERATOR	3
6.	REPORTING AND CORRECTING PROBLEMS AND DISCREPANCIES	3
7.	CONTROL HOUSE	4
8.	YARD INSPECTION	7
9.	OIL LEAK REPORTING	9
10.	APPARATUS INSPECTIONS	10
11.	FINAL CHECKLIST	12
12.	APPENDIX A ADDITIONAL MATERIALS	12
13.	APPENDIX B – TROUBLE REPORTING	15
14.	RECORD OF REVISIONS	16

1. Test Equipment Required.

- 1.1 Digital Multi-meter, IEC 1010-1 Cat. IV
 - 1) Spare battery
- 1.2 Recloser Battery test meter with load test feature.
 - a) For Form 3 Recloser battery tests.

2. Materials Required.

- 2.1 PDA with National Grid V&O software installed.
- 2.2 Clipboard
- 2.3 Binoculars
- 2.4 Flashlight
- 2.5 Magnet for resetting drag hands
- 2.6 Additional items listed in Appendix A

3. Initial Substation Entry

- 3.1 Personal Protective Equipment.
 - 1) Minimum requirement is ANSI Z41/EH rated safety footwear, hard hat and safety glasses.
- 3.2 Vehicles entering substation.
 - 1) Lower and/or insure antennas will maintain minimum approach distances to energized conductors and apparatus.
 - 2) Use extreme caution when maneuvering to avoid hitting apparatus or violating Minimum Approach Distances.

4. Inspect Yard

- 4.1 Perform a quick initial inspection for:
 - 1) Alarms.
 - 2) Cut or removed ground grid or ground grid connections.
 - 3) Obvious damage.
 - 4) Security of gates, fence and locks.
 - 5) Unusual noises.

5. Notify the System Operator

- 5.1 Inform them you are in the Station for a V&O Inspection and that you will be testing alarms.
- 5.2 Ask System Operator if any equipment has been tagged out or relays blocked.

6. <u>Reporting and Correcting Problems and Discrepancies</u>

- 6.1 Severe Trouble shall be reported to the responsible Control Center and the person in charge of the substation immediately.
 - 1) The employee shall secure the area and warn unauthorized people to stay clear of the danger.
 - 2) A severe trouble condition is a situation that is hazardous to the system operation and/or National Grid employees or the public.
 - a) See Trouble Reporting Appendix at the end of this document for additional information on trouble reporting.
- 6.2 See the section Oil Leak Reporting for information on reporting oil leaks.
- 6.3 Document all paint and preservation problems.
 - 1) Rust, corrosion, or fading to the point where primer, or bare metal shows.
- 6.4 Problems and discrepancies found should be repaired during the V&O Inspection whenever possible.
- 6.5 Problems and discrepancies not corrected during the V&O Inspection shall be recorded on the Inspection Card (Apparatus Inspections) or as a note in the PDA (Station V&O Inspections).
 - 1) The Supervisor reviewing the inspection shall generate follow-up work orders to document the required work.
- 6.6 Record findings in the PDA if listed in the PDA "round".
 - 1) Record other readings or problems as Notes in the PDA
 - 2) If performing an apparatus inspection record the V&O Inspection portion in the V&O section of the Inspection Card.

7. Control House

- 7.1 Check control house door locks working and in good condition.
- 7.2 Station Log Book
 - 1) Enter the date, time and employee names that are performing the V&O Inspection.
 - 2) Check the Station Log Book for abnormal conditions that can be corrected during the V&O Inspection.
 - a) After the V&O Inspection, record all abnormal problems found in the Log Book, with red pen, and whether they were corrected or not.
- 7.3 SPCC SPCC locations only.
 - 1) Verify SPCC Plan is available at the substation.
 - 2) Verify SPCC notification list posted.
 - 3) Check oil spill containment kits complete and in good condition.
- 7.4 Control Panels
 - 1) Indicating Lights
 - a) Check that the indicating lights on the control board are working.
 - b) Check the available stock of spare bulbs; restock as necessary.
 - c) Inspect rear of Control boards for any signs of overheating, burned wiring, moisture, etc.
- 7.5 Noises Listen for any unusual noises from relays, modules, RAPRs, timer circuits etc.
- 7.6 Relay targets and alarms.
 - 1) Record targets and alarms on the V&O Report and in the station log book.
 - a) List the apparatus affected indicating circuit designation, phase and type of relay or alarm,
 - 2) Reset and report relay targets and alarms to the System Operator and your supervisor.
- 7.7 Reclosing Relays
 - 1) Check that reclosing relays are in service.
 - a) Record any reclosing relays that are off and tagged.
 - b) Report any reclosing relays that are off and not tagged to the System Operator.
 - 2) Verify mechanical reclosing relays are in the start or zero position.
- 7.8 Ground Trip Switches (cutouts)
 - 1) Check that all ground trip relays are in service (ON).
 - a) Record any ground trip switches that are off and tagged.
 - b) Report any ground trip switches that are off and not tagged to the System Operator.

- 7.9 Bus Transfer Schemes
 - 1) Check both buses alive (load ammeters, bus voltmeters bus alive lights).
 - 2) Check timers reset
 - 3) Check that the sequence timers in normal position
 - 4) Check transfer scheme auto
 - a) Record any auto transfer switches that are manual or off and tagged.
 - b) Report any auto transfer switches that are manual or off and not tagged to the System Operator.
 - 5) Check tie breakers properly setup (setup varies by station scheme).
- 7.10 High Side Transfer Schemes
 - 1) Check both lines alive (load ammeters, line alive lights).
 - 2) Check timers reset
 - 3) Check that the sequence timers in normal position
 - 4) Check transfer scheme auto
 - a) Record any auto transfer switches that are manual or off, and tagged.
 - b) Report any auto transfer switches that are manual or off, and not tagged to the System Operator.
 - 5) Check air break/circuit breaker/circuit switcher status (open or closed).
- 7.11 Annunciator and Alarm Test Switches
 - 1) Annunciator panel
 - a) Move toggle switches, that are not tagged, to the TEST position to check lights. This will send an alarm to the Control Center.
 - b) To clear trouble condition, turn the toggle switch to the reset position, then back to ON.
 - c) Check with supervisor before testing any switches that are in the off position.
 - d) Verify the System Operator received the alarms.
 - 2) Test Switches
 - a) If the alarm light is on perform steps b) through f).
 - b) Verify the System Operator received the alarm.
 - c) Open knife blades one by one and leave open until the light goes out and the alarm clears.
 - d) Close the knife switches opened one at a time, checking for alarm indications.
 - e) When the alarm light comes on reopen the last switch closed and continue closing the rest. This will find multiple alarms, if present.
 - f) Operating the knife switches does not reset this type of alarm system. The light only stays out when the trouble condition has cleared.

- 3) Repair of alarm conditions.
 - a) Alarm conditions should be corrected during the V&O Inspection.
 - b) If the alarm condition can not be corrected during the V&O:

The alarm should be cleared by opening the test twitch or turning the annunciator switch to OFF.

The switch should be tagged with the date, reason and inspectors name. Both the System Operator and your supervisor should be notified that the alarm condition exists and the alarm point is off.

- 7.12 Radio Alarms
 - 1) Inspect condition of radio system for damage, and proper operation.
 - 2) If individual alarms have not been sent to the System Operator send a test alarm to from the radio cabinet.
 - a) Verify the System Operator received the alarm.
 - 3) Make sure cabinet door is closed so the receiver voice communication is disabled.
- 7.13 Tags and Clearance and Control switching forms and Supplies
 - 1) Check the stock of Clearance and Control Tags.
 - a) Restock as necessary.
 - 2) Check the stock of Ground Device Identification Tickets (GDIT).
 - a) Restock as necessary.
 - 3) Check the stock of Filed Switching Order Pads
 - a) Restock as necessary.
 - 4) Check that pens (red and blue/black) and pencils are available.
 - a) Restock as necessary.
- 7.14 Control House Heating and Lighting
 - 1) Test control house lighting.
 - a) Replace any defective bulbs, or ballasts or sockets.
 - 2) Test emergency lighting.
 - a) Replace batteries if needed
 - 3) Inspect heaters, fans and thermostats for proper operation. Make sure fans are not broken or bound up and they are in good working order.
- 7.15 Station Service and Transfer Switch
 - 1) Check transfer switch on preferred supply
 - 2) Check transfer switch for damage or overheating.
 - 3) Test and record preferred and alternate secondary voltages at transfer panel.
- 7.16 Check AC supply panels for:
 - 1) Tripped circuit breakers.
 - 2) Circuit breakers in the proper position.
- 7.17 Check DC Circuit Breaker of Fuse Panel
 - 1) Check DC supply panels for:
 - a) Tripped circuit breakers or blown fuses.
 - b) Circuit breakers in the proper position.

- 7.18 Protective Grounds
 - 1) Check that grounds in station are in sets of 3 and that they are hung up properly.
 - 2) Check that the phase end and ground clamps are in good working order.
 - 3) Lubricate as required.
 - 4) Inspect for the cracked or cut insulation and broken conductor strands.
 - 5) Replace or repair damaged protective grounds. Do not leave damaged grounds at the station.
- 7.19 Switch Sticks
 - 1) Inspect Switch Sticks and Grounding Sticks for current dielectric test date.
 - a) Send out of date sticks to lab for testing or;
 - b) Test locally using approved methods, test equipment and competent, trained personnel.
 - 2) Inspect Switch Sticks and Grounding Sticks for surface contamination, damage and proper operation.
 - a) Clean if necessary
 - 3) Insure Switching and Grounding Sticks are stored properly.
- 7.20 Fire Equipment
 - 1) Inspect fire extinguishers to be properly secured and in their marked locations.
 - 2) Update inspection cards.
 - 3) Record out of date fire extinguishers on the V&O and record for future replacement.
 - 4) Discharged fire extinguishers shall be reported to the appropriate supervisor for recharging.
 - 5) Discharged or partially discharged fire extinguisher shall be removed from the substation.
- 7.21 Phone Lists
 - 1) Verify local and regional System Operator phone numbers are posted and correct.
 - 2) Verify that the emergency telephone list is posted and clearly visible at each telephone location.
- 7.22 Cleanliness and General Condition -
 - 1) Clean control house floors and sanitary facilities, empty wastebaskets and dust as necessary.
 - 2) Inspect control house for water leaks.
 - 3) Check for signs of animal entry into control house.
- 7.23 Turn on yard lights, so they can be checked during the Yard Inspection.

8. Yard Inspection

- 8.1 Unusual Noises
 - 1) Be alert for arcing, gurgling and pinging noises which could indicate imminent and violent equipment failure.
- 8.2 Walk the fence and inspect:
 - 1) Barbed wire Strands to be intact and tight.
 - 2) Fence fabric Holes or breaks in the chain link.

- 3) Fence Ties Loose or missing fence tie wires.
- 4) Fence Erosion Signs of erosion or digging under the fence.
 - a) Space below fence should be less than 3 inches.
- 5) Grounding Ground conductor and connections secure and connected at every other fence post. Posts on both sides of gates should be grounded.
- 6) Fence Posts Sound, not rusted through at ground level and not been raised by frost.

8.3 Gates

- 1) Test gates for proper operation.
 - a) Gates should swing easily out of the way.
- 2) When closed, the gates should by chained tightly, or locked, with minimal space.
- 3) Verify locking chains, hardware and locks present and in good condition.
- 8.4 Check for proper "Danger High Voltage" warning signs:
 - 1) Every 50 feet along perimeter of fence.
 - 2) On gates and on non-hinged side of gate. (see National Grid Standard #0105)
- 8.5 Substation yard security problems shall be corrected or reported immediately to supervisor.
- 8.6 Vandalism related problems should be specifically recorded as such, and reported to supervisor.
- 8.7 Yard Lights
 - 1) Check all yard lights working. (Yard lights should have been turned on during control house inspection.)
 - 2) Repair broken bulbs, glass fixtures, spot light heads, or other lighting that needs attention.
 - a) If work cannot be completed safely and while maintaining safe work clearances or if special equipment such as a bucket truck is needed, note on the V&O report.
- 8.8 Vegetation
 - 1) Check for any growth of trees or vegetation in fence and gate areas that animals or people could used to climb over the fence.
 - a) Cut or record for the Arborist to have removed.
 - 2) Record vegetation growth within the substation that requires spraying or removal.
- 8.9 Bus and structure.
 - 1) Record missing or damaged animal protection devices.
 - 2) Inspect insulators for:
 - a) Broken, chipped or damaged skirts.
 - b) Carbon tracking or flash over.
 - c) Surface contamination (dirt, rust, salt spray etc.).
 - d) Broken or damaged insulators should be recorded on V&O Report.
 - 3) Broken porcelain should be picked up off the ground.
 - 4) Visually inspect current and voltage transformers for damage or signs of overheating.
 - 5) Visually inspect arresters for:
 - a) Blown or damaged arresters
 - b) Surface contamination

- 6) Visually inspect potheads and cable terminators for:
 - a) Damage and leaking compound.
 - b) Surface contamination
- 7) Report unusual noises immediately and record them on the V&O Report.
- 8.10 Structure and apparatus ground connections
 - 1) Inspect for any cut, broken or missing ground connections to apparatus, structures and guy wires.
 - 2) Inspect static wires and record any problems.
 - 3) Visually Inspect Station Service Transformers for:
 - a) Evidence of oil leaks on transformer tank, and on the ground.
 - b) Bushing damage or surface contamination.
 - c) Damaged or improperly closed primary fuses.
 - d) Output Voltage if not previously measured at station service transfer switch.
- 8.11 Inspect equipment and structure foundations.
 - 1) Large cracks.
 - 2) Settling (not level).
 - 3) Deterioration (large areas of surface erosion, stone showing).
- 8.12 Inspect Cableways
- 8.13 Damage, missing or broken cover sections and deterioration.
- 8.14 Inspect buildings junction boxes, structures etc. for overall paint condition
 - a) Record items needing attention.
- 8.15 Clean up substation yard.
 - 1) Remove broken porcelain, debris, and trash
 - 2) If area requires major clean up or crushed stone requires leveling, note on V&O Report.
 - 3) If equipment or materials are intentionally stored in the yard insure that they are neatly placed and not a hazard to personal. Barricade area if necessary.
 - a) Storage should be in compliance with SMS 499.10.1 Substation Work Area Identification Procedure.

9. Oil Leak Reporting

- 9.1 Oil filled apparatus must be inspected for any signs of leaks.
 - 1) The oil leak status shall be recorded for each piece of oil filled apparatus that has an oil leak screen in the PDA.
 - 2) Leaks from small apparatus that do not have an oil leak screen in the PDA should be recorded in a PDA notes screen.
- 9.2 Oil Leak Status Codes
 - 1) Oil leaks are categorized as follows:
 - a) Unknown Unknown is used to indicate that no information has been entered in AIMMS for this equipment.
 - b) Clean Apparatus is dry and shows no evidence of oil leaks.

- c) Repaired A leak is found and repaired, note the repairs made.
- d) Weep Anytime the external surface of a piece of apparatus is wet with oil. Note the location and, if possible, cause of the leak.
- e) Leak Oil is running off or about to run off the external surface of containers or electrical apparatus. Required Action
- 9.3 Leaks categorized as Leak require immediate action to stop the leak or contain the released oil.
- 9.4 All leaks require creation of a Leak Report Work Order.
 - 1) When the supervisor reviews the V&O inspection work order round screen all leak status changes and notes will show up as exceptions.
 - 2) The Supervisor will then create a Leak Report Work order (Type LR) in Work Order Tracking or Quick Reporting.
- 9.5 Leaks from PCB Equipment
 - 1) If a leak is discovered from equipment classified as over 500 ppm PCB cleanup must begin within 48 hours (40 CFR 761.30(a)(1)(x).
 - 2) The inspection records must also include:
 - a) The location of the leak;
 - b) The estimate of fluid released;
 - c) The date and description of any cleanup, containment, repair or replacement;
 - d) The results of any containment (for example, was containment successful or not).
 - e) The daily inspection results required for uncorrected, active leaks (refer to Environmental Procedure EP-14).
 - f) The records must be available for inspection by the EPA and must be maintained for at least three years after disposal of the equipment.

10. Apparatus Inspections

Refer to the V&O Inspection sections of the following SMS's for apparatus inspections.

Circuit Breakers

SMP 401.01.2 – Air Magnetic Circuit Breaker Maintenance Procedure

SMP 401.02.2 – Oil Circuit Breaker Maintenance Procedure

SMP 401.03.2 – Vacuum Circuit Breaker Maintenance Procedure

SMP 401.04.2 – Air Blast Circuit Breaker Maintenance Procedure5

SMP 401.05.2 – Two Pressure Gas Circuit Breaker Maintenance Procedure

SMP 401.06.2 – Gas Puffer Circuit Breaker Maintenance Procedure

SMP 401.07.2 – Station Recloser Maintenance Procedure

SMP 401.08.2 – Vacuum Switch Maintenance Procedure

Transformers

SMP 402.01.2 – Power – 15 MVA and above Maintenance Procedure SMP 402.02.2 – Power – Below 15 MVA Maintenance Procedure SMP 402.03.2 – Dry Type Transformer Maintenance Procedure

Instrument Transformers SMP 403.01.2 – Currents, Potentials and Metering Maintenance Procedure Voltage Regulators SMP 404.01.2 – Step Voltage Regulator Maintenance Procedure SMP 404.02.2 – Induction Voltage Regulator Procedure **Emergency Generators** SMP 405.01.2 – Emergency Generators Maintenance Procedure Batteries & Chargers SMP 406.01.2 – Lead/Acid Battery Maintenance Procedure SMP 406.03.2 – Static Changers Maintenance Procedure Sensing Devices SMP 407.01.2 – Bushing Potential Device Maintenance Procedure SMP 407.02.2 - Coupling Capacitors and CCVTs Maintenance Procedure SMP 407.03.2 – Wave Trap Maintenance Procedure SMP 407.04.2 – Resistive Coupled Potential Device Maintenance Procedure Capacitors SMP 408.01.2 – Station Capacitor below 69kV Maintenance Procedure Disconnect Switches SMP 409.01.2 – Disconnect Switches Maintenance Procedure SMP 409.02.2 – Circuit Switchers Maintenance Procedure SMP 409.03.2 – High Speed Grounding Switch Maintenance Procedure SMP 409.04.2 – Gas Insulated Disconnect Switch Maintenance Procedure SMP 409.05.2 – Gas Insulated Ground Switch Maintenance Procedure Load Tap Changer SMP 412.01.2 – Load Tap Changer Maintenance Procedure Reactors SMP 413.01.2 – Dry Type Reactor Maintenance Procedure SMP 413.02.2 – Oil Filled Reactor Maintenance Standard Metal Clad Bus and Switchgear SMP 417.02.2 – Metal Clad Bus, Switchgear and Substation Maintenance Procedure Surge Arresters SMP 419.01.2 – Surge Arrester Maintenance Procedure Network Protectors SMP 421.03.2 – Network Transformers and Protectors Maintenance Procedure

11. Final Checklist

- 11.1 Turnoff yard lights
- 11.2 Verify all abnormal conditions found are entered in station log book.
- 11.3 Call the System Operator and notify them that the V&O Inspection has been completed and you will be leaving the station.
 - a) Report any abnormal conditions, alarms or relay targets found.
- 11.4 Turn control house lights off and lock doors.
- 11.5 Re-arm security alarms.
- 11.6 Close and securely lock gate.
- 11.7 Turn in completed V&O Inspection Report to supervisor.
- 11.8 Return PDA to cradle and upload Station Inspection "round".

12. Appendix A. - Additional Materials

Not all of the listed items will be required in all areas. It is suggested that the items required for a particular area be stocked in the vehicle used for V&O Inspections or a large container that can be taken when inspections are to be done.

- 12.1 Cleaning Supplies
 - 1) Broom and dust pan
 - 2) Rags
 - 3) Trash bags
- 12.2 Repair and Maintenance
 - 1) Shovel
 - 2) Ladder
 - 3) Electrical tape
 - 4) Small hand tools
- 12.3 Personal Protective Equipment
 - 1) Acid resistant gloves
 - 2) Face Shield and Apron
- 12.4 Station Supplies
 - 1) Spare Station Log Books
 - 2) System Operator (phone number) cards
 - 3) Spare operations counter cards
 - 4) Pen, pencils and erasers (red pencil for trouble)
 - 5) Clearance and Control Tags
 - a) Red Tags
 - b) Non-Reclose Assurance (NRA) Tags
 - c) Hold Tags
 - d) Station Control (SCT) Tags
 - e) Worker Placards
 - 6) Ground Device Identification Tickets (GDIT)
 - 7) Clearance and Control Switching forms

SMP 400.06.2 v1.7 VISUAL AND OPERATIONAL (V&O) INSPECTION 09/30/2008

- 12.5 Security Supplies
 - 1) Spare Padlocks Locks:
 - a) Long shank 5105873
 - b) Short shank 5105872
 - 2) Chain for gates
 - 3) Fence tie wire
 - 4) Fence fabric
 - 5) Warning signs 0810029
- 12.6 Indicating Lamps and Lenses:
 - 1) Switchboard. LED (Red) S/C 5100183
 - 2) Lens Cap (Red) S/C 5695322
 - 3) Switchboard. LED (Green) S/C 5100184
 - 4) Lens Cap (Green) S/C 5695321
 - 5) Switchboard. LED (Amber & White) S/C 5100185
 - 6) Lens Cap (Amber) S/C 5695320
 - 7) Lens Cap (White) S/C 5100186
 - 8) Switchboard Lamp 24EX S/C 5844590
 - 9) Switchboard Lamp 145 Volt, 15W S/C 5841410
 - 10) Indicating Bulb type 49 S/C 5843078
 - 11) Indicating Bulb type 47 S/C 5843100
 - 12) 18 Volt Miniature 0.11A Automotive S/C 5843110
 - 13) Indicating 35V, .06A S/C 5843132
 - 14) Indicating type 43A S/C 5843250
 - 15) Switchboard Lamp 24X S/C 5844610
 - 16) Switchboard Lamp 55C S/C 5844630
 - 17) Indicating Lamp 120 P.S.B. S/C 5841359
 - 18) (for V.S.A. Reclosers)
- 12.7 Incandescent Lamps:
 - 1) Incandescent Lamp 75 Watt S/C 5841739
 - 2) Incandescent Lamp 100 Watt S/C 5841840
 - 3) Incandescent Lamp 135 Watt S/C 5842001
 - 4) Incandescent Lamp 200 Watt S/C 5842150
 - 5) Mogul Base Lamp 500 Watt S/C 5842390Flood lamp PAR 38 100 Watt S/C 5842045
 - 6) Fluorescent Lamps:
 - 7) 8 FT Single Pin Lamp 75 Watt S/C 5841050
 - 8) 4 FT Bi Pin Lamp 40 Watt S/C 5840950
 - 9) 4 FT Single Pin Lamp 40 Watt S/C 5840940
 - 10) 8 FT Recessed Pin Lamp 105 Watt S/C 5841130

- 12.8 Spare emergency light batteries
- 12.9 Spare fuses
- 12.10 Recloser control and trip fuses
 - a) Reclosers often use time delay fuses that are similar in appearance to AGC types. If the wrong type fuse is installed it will blow after a couple of operations.
 - 2) Cartridge fuses
 - a) 5A
 - b) 10A
 - c) 15A
 - d) 20A
 - e) 30 A
 - 3) AGC Fuses
 - a) 2 A slow blow and instantaneous
 - b) 5A slow blow and instantaneous
 - c) 10A slow blow and instantaneous
 - d) 20A slow blow and instantaneous
- 12.11 Spare nitrogen bottles
- 12.12 Battery Supplies
 - a) 5 Gallon distilled water and battery filler S/C 5599778
 - b) Battery NO SMOKING Signs S/C 5483448
 - c) Extra hydrometer S/C 5474448
 - d) Extra thermometer S/C 487304
 - e) Baking Soda
 - f) Spare eyewash bottles S/C 5890600
 - g) Nylon brush to clean battery posts
 - h) Battery grease

12.13 Spare recloser batteries

13. Appendix B – Trouble Reporting

- 13.1 Trouble
 - 1) The term trouble is defined as any condition which occurs on the equipment that has or could affect the ability of that equipment to perform its required function.
- 13.2 Severe Trouble
 - 1) A severe trouble condition is a situation that is immediately hazardous to the system operation and/or personnel. These troubles are immediately reported to the System Operator and to the person in charge of the substation. The employee shall secure the area and warn unauthorized people to stay clear of the danger.
 - 2) Examples of Severe Trouble
 - a) Dead station battery
 - b) Blown bushings or cable terminator
 - c) Downed live lines
 - d) Multiple broken support insulators
 - e) Electrical fires
 - f) Grounds cut in station
 - g) Loss of station service power
 - h) Broken pole or structure
 - i) Blown by pass/shunt arresters on regulators
 - j) Low oil levels
 - k) Unusually noises
- 13.3 Not Immediately Fixable Trouble
 - 1) These troubles are reported to the System Operator and the person in charge of the substation. They shall also be noted on the V&O form and station logbook in red and scheduled for repair at a later date.
- 13.4 Examples of Not Immediately Fixable Trouble
 - a) Surge Arrester blown
 - b) Broken operating rods on disconnects
 - c) Damaged bus support insulators
- 13.5 Fixable Trouble
 - Fixable items should be repaired as they are discovered during the V&O Inspection. This
 insures that the station is maintained in the best possible operating condition and
 prevents unnecessary return trips. The items fixed should be noted on the V&O Report
 and in the station logbook.
 - 2) Examples of Fixable Trouble
 - a) Low Battery electrolyte
 - b) Replacing blown lamps
 - c) Changing filters
 - d) Installing missing covers

- e) Installing signs
- f) Repairing holes in fence
- g) Installing new locks
- h) Cleaning and repairing oil leaks
- i) Tightening compressor belts
- j) Changing recloser batteries
- k) Replacing control fuses
- I) Changing nitrogen bottles
- m) Changing Silica Gel turned pink or white
- n) Cleaning and repairing leaks

14. <u>Record of Revisions</u>

Revision	Changes
08/20/2007	Reporting Changed – Section name to Reporting and Correcting Problems and Discrepancies Revised – Section extensively revised
	Materials Required Removed - Substation V&O Inspection Report form, Inspection Report from last V&O Inspection, Substation V&O Checklist form.
09/30/2007	Switch Sticks Added - or; Test locally using approved methods, test equipment and competent, trained personnel.

Appendix 16

NG-USA EOP G029 Tracking Temporary Repairs To Electric System

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G029
national grid	GENERAL	Page 1 of 5
national grid	TRACKING TEMPORARY REPAIRS TO ELECTRIC SYSTEM	Version 1.0 – 05/07/10

INTRODUCTION

The purpose of this procedure is to outline the steps to be taken when a temporary repair is made to the electric system to restore service or maintain public safety until a permanent repair can be made. Every effort should be made to make permanent repairs within 90 days. For those rare exceptions when permanent repairs are not made within 90 days, special reporting and periodic site visits are required to monitor the temporary repairs until the permanent repairs are completed.

PURPOSE

This procedure applies to all personnel who are responsible for initiating temporary repairs along with employees who are responsible for designing, planning, scheduling and construction of permanent repairs made at locations where temporary repairs were made to restore service or maintain public safety.

ACCOUNTABILITY

- 1. Distribution Engineering Services
 - A. Update procedure as necessary.
- 2. Customer Operations
 - A. Ensure the components of the procedure are implemented.
 - B. Ensure workers are trained in this procedure.
 - C. Provide revision input as necessary.
- 3. Workers
 - A. Demonstrate the understanding of the procedure.
 - B. Comply with the requirements of the procedure.
- 4. Inspections
 - A. Ensure components of this procedure are implemented.
 - B. Track temporary repairs identified by Inspections
 - C. Provide periodic inspections of temporary repairs greater than 90 days.
 - D. Compile and submit report to PSC.

COORDINATION

Not Applicable

REFERENCES

State of New York Public Service Commission Order 04-M-0159 State of New York Public Service Commission Order 04-M-0159 Adopting Changes to Electric Safety Standards Effective December 15, 2008.

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File: NG-EOP G029 Tracking Temporary Repairs to Electric	Originating Department:	Sponsor:	
System	Distribution Engineering Services	Patrick Hogan	

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G029
national grid	GENERAL	Page 2 of 5
national gi lu	TRACKING TEMPORARY REPAIRS TO ELECTRIC SYSTEM	Version 1.0 – 05/07/10

DEFINITIONS

<u>Confirming Work Request</u>: Any emergency work completed in the field, does not require scheduling and is not billable to a 3rd party.

Level 9: This priority category is used when a temporary repair is identified in the field by Inspections.

<u>Non-confirming Work Request</u>: Any emergency work not completed in the field, requires scheduling and is not billable to a 3rd party.

Permanent Repair: Repaired in accordance with National Grid Standards.

Property Damage Claim: Billable emergency work.

TRAINING

Provided by appropriate National Grid training program.

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DOCUMENT CONTENTS

Table of Contents

1.0	TEMPORARY REPAIRS MADE BY OPERATIONS	. 4
2.0	TEMPORARY REPAIRS DISCOVERED BY INSPECTIONS	. 4
3.0	TEMPORARY OVERHEAD REPAIRS (TOH)	. 4
4.0	TEMPORARY REPAIRS NOT COMPLETED WITHIN 90 DAYS	. 4
5.0	NYS PUBLIC SERVICE COMMISSION REPORTING	. 5
6.0	REVISION HISTORY	. 5

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national**grid**

1.0 TEMPORARY REPAIRS MADE BY OPERATIONS

Temporary repairs that are made by operations to restore service or maintain public safety until permanent repairs can be made; are recorded by Distribution Support Services utilizing a pre-formatted form that will require all pertinent information needed in order for the Temporary Repair to be entered into the Maintenance Database. The form will then be e-mailed to a 'group' mailbox that the Inspections Department Administrative staff will be authorized to access. Information from the attached form will be used by the admins to enter the Temporary Repair into the Maintenance Database with the appropriate maintenance code, and assigned a priority of Level 9. The Level 9 would indicate that this a temporary repair that should be completed within 90 days. Maintenance codes assigned a Level 9 will be downloaded from the maintenance database nightly into STORMS. Level 9 codes associated with a maintenance item will be assigned directly to Scheduling to be scheduled within 20 business days. Level 9 codes that require design will be downloaded from maintenance database and placed in the work queue for the Distribution Design Supervisor or Engineering Supervisor for the appropriate area. Scheduling will have 20 business days to schedule the Level 9 work request to the field for completion.

2.0 TEMPORARY REPAIRS DISCOVERED BY INSPECTIONS

Temporary repairs located by Inspections during an inspection are to be recorded in the Maintenance Database with the appropriate maintenance code and with an assigned priority Level 9. The Level 9 would indicate that this a temporary repair that should be completed within 90 days. Maintenance codes assigned a Level 9 will be downloaded from the maintenance database nightly into STORMS. Level 9 codes associated with a maintenance item will be assigned directly to Scheduling to be scheduled within 20 business days. Level 9 codes that require design will be downloaded from maintenance database and placed in the work queue for the Distribution Design Supervisor or Engineering Supervisor for the appropriate area. Scheduling will have 20 business days to schedule the Level 9 work request to the field for completion.

3.0 TEMPORARY OVERHEAD REPAIRS (TOH)

Temporary overhead repairs (TOH) are utilized by operations to restore service while the underground cable that generally serves the facilities is being repaired. TOH's that meet National Grid Overhead Standards for construction would not be considered a temporary repair that would need to be tracked under this procedure. TOH's not meeting National Grid Overhead Standards for construction are required to be tracked under this procedure as a temporary repair and follow the process outlined in paragraph 1 above.

4.0 TEMPORARY REPAIRS NOT COMPLETED WITHIN 90 DAYS

Every effort should be made to complete temporary repairs within 90 days. In extraordinary circumstances, which may include major storms, where repairs may extend beyond 90 days (exceptions), the company shall periodically perform site visits to monitor the condition of the temporary repairs. The company shall also report these exceptions as part of the reporting requirements outlined in the State of New York Public Service Commission Order 04-M-0159 Adopting Changes to Electric Safety Standards Effective December 15, 2008.

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System	Distribution Engineering Services	Patrick Hogan	

	ELECTRIC OPERATING PROCEDURE	Doc. # NG-EOP G029
national grid	GENERAL	Page 5 of 5
national grid	TRACKING TEMPORARY REPAIRS TO ELECTRIC SYSTEM	Version 1.0 – 05/07/10

The Inspections group is responsible for tracking all temporary repairs that extend beyond 90 days. The initial periodic inspection should take place after 90 days and every 45 days until the permanent repair is made. The Inspection supervisor should run a report from the maintenance database for open Level 9 codes. The periodic inspection time frame lines up with the periodic inspection requirements for the elevated voltage findings requirements and could be run at the same intervals.

It is strongly encouraged that these temporary repairs be completed as soon as practicable to limit the burden of tracking these repairs.

5.0 NYS PUBLIC SERVICE COMMISSION REPORTING

Temporary repairs that are beyond 90 days must be identified and justified as part of the reporting requirements of the PSC Orders referenced below. The 90 days time period commences on the day the temporary repair was located. Inspections will be responsible for consolidating the temporary repair information from operations and from the maintenance database in order to prepare the report that will be submitted to the PSC. The report will identify the temporary repairs that exceeded 90 days, the periodic site visit information and the justification for the repair taking longer than 90 days. Inspections shall file the report by February 15 each year.

6.0 REVISION HISTORY

Version Date Description of Revision

1.0 05/07/10 This is a new document.

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Appendix 17

Certifications

1

<u>CERTIFICATION</u> STRAY VOLTAGE TESTING

STATE OF NEW YORK)) ss.: COUNTY OF ALBANY)

Keith P. McAfee, on this <u>day of February 2016</u>, certifies as follows:

- I am the Vice President, Maintenance and Construction, New York Electric, of Niagara Mohawk Power Corporation d/b/a National Grid (the "Company"), and in that capacity I make this certification for the annual period ending December 31, 2015 (the "Twelve-Month Period") based on my knowledge of the testing program adopted by the Company in accordance with the Public Service Commission's Orders issued and effective January 5, 2005, July 21, 2005, December 15, 2008, March 22, 2013, and January 13, 2015 in Case 04-M-0159 (collectively the "Orders"), including the Quality Assurance Program filed by the Company with the Commission.
- 2. In accordance with the requirement of the Orders, the Company developed a program designed to test (i) all publicly accessible underground electric distribution facilities owned by the Company ("Underground Distribution Facilities") on an annual basis, (ii) all metallic streetlights and traffic signal poles located in public thoroughfares in the Company's service territory to which the Company provides service ("Streetlights") on an annual basis, and (iii) all publicly accessible overhead distribution facilities, underground

page

2

residential distribution ("URD") facilities, overhead and underground transmission facilities, and substation fences owned by the Company at least once every five years ("Facilities"), all as identified through a good faith effort by the Company for stray voltage (the "Stray Voltage Testing Program").

- I am responsible for overseeing the Company's Stray Voltage Testing Program.
- 4. I hereby certify that, to the best of my knowledge, information, and belief the Company has implemented and completed its Stray Voltage Testing Program for the Twelve Month Period. Except for untested structures that are identified as inaccessible in the Company's Annual Report, submitted herewith, the Company is unaware of any Facilities, Underground Distribution Facilities, or Streetlights that were not tested during the Twelve-Month Period in accordance with the Stray Voltage Testing Program.
- 5. I make this certification subject to the condition and acknowledgement that it is reasonably possible that, notwithstanding the Company's good faith implementation and completion of the Stray Voltage Testing Program, there may be Facilities, Underground Distribution Facilities, and Streetlights that, inadvertently, may not have been tested or were not discovered or known after reasonable review of Company records and reasonable visual inspection of the areas of the service territory where Facilities, Underground

Distribution Facilities, and Streetlights were known to exist or reasonably expected to be found.

Keith P. McAfee

Sworn to before me on this 1st day of February, 2016

Notary Public:

Lua muemple

LISA M. WEMPLE Notary Public, State of New York Qualified in Fulton County No. 4984095 Commission Expires July 15, 20, 19

CERTIFICATION FACILITY INSPECTIONS

STATE OF NEW YORK)) ss.:COUNTY OF ALBANY)

Keith P. McAfee, on this day of February 2016, certifies as follows:

- I am the Vice President, Maintenance and Construction, New York Electric, of Niagara Mohawk Power Corporation d/b/a National Grid (the "Company"), and in that capacity I make this certification for the annual period ending December 31, 2015 (the "Twelve-Month Period") based on my knowledge of the inspection program adopted by the Company in accordance with the Public Service Commission's Orders issued and effective January 5, 2005, July 21, 2005, December 15, 2008, March 22, 2013, and January 13, 2015 in Case 04-M-0159 (collectively the "Orders"), including the Quality Assurance Program filed by the Company with the Commission.
- 2. The Company has an inspection program that is designed to inspect all of its electric facilities on a five-year inspection cycle, as identified through a good faith effort by the Company ("Facilities"), in accordance with the requirements of the Orders (the "Facility Inspection Program").

- 3. I am responsible for overseeing the Company's Facility Inspection Program.
- I hereby certify that, to the best of my knowledge, information, and belief the Company has implemented and completed its Facility Inspection
 Program to inspect approximately 20 % of its Facilities during calendar year 2015, to comply with the five-year inspection cycle required under the Orders.

Keith P. MoAfee

Sworn to before me on this 1st day of February, 2016

Notary Public:

samuenple

LISA M. WEMPLE Notary Public, State of New York Qualified in Fulton County No. 4984095