In the Matter of

Consolidated Edison Company of New York, Inc.

Case 09-E-0428

August 2009

Prepared Exhibit of:

Staff Shared Services Panel

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Staff Shared Services Panel Exhibit__(SSSP-1)

Staff Information Request

IR Number	Exhibit P	age(s)
DPS-192.9	2	

Company Name: Con Edison
Case Description: 2009 Electric Rate Filing
Case: 09-E-0428

Response to DPS Interrogatories – Set DPS19
Date of Response: 07/07/2009
Responding Witness: Shared Services

Question No. :192.6-192.11

Subject: Human Resources – Employee Development - Tri-Annual First Aid Refresher Training - 6) Provide a copy of the OSHA requirements for First Aid Refresher training. 7) Provide a copy of the American Red Cross Standards, as referenced in Exhibit_(SSP-9), pertaining to First Aid Training. 8) Explain why for 2010 a full day of training is required, versus the half day of training previously required. 9) For each of the three proposed rate years, provide a detailed cost breakdown of expenses for this program. 10) Provide a detailed estimate of contractor costs and expenses needed to supplement instruction for the First Aid Refresher training. 11) Provide a training schedule for the 6500 employees that are required to take the First Aid Refresher training.

Response:

6. The website http://www.osha.gov provides the various regulations that address the requirement for First Aid Refresher training.

We have copied the specific portions of the regulation that require us to conduct this training.

1910.151(b) In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available.

1910.9(b) *Training*. Standards in this part requiring training on hazards and related matters, such as standards requiring that employees receive training or that the employer train employees, provide training to employees, or institute or implement a training program, impose a separate compliance duty with respect to each employee covered by the requirement. The employer must train each affected employee in the manner required by the standard, and each failure to train an employee may be considered a separate violation.

7. The attached document from the American Red Cross provides information on the First Aid Training they offer. We have chosen their Basic First Aid Certification training which is valid for 3 years. Their CPR certification is valid for 1 year. The American Red Cross and OSHA signed an alliance in 2005 whereby they work together to provide

information, guidance and access to training resources on safety and health topics including emergency preparedness, disease prevention and first aid in the workplace. It is this relationship and the recognized excellence that the American Red Cross provides in their training that we have chosen them as a source for our First Aid Training.

- 8. In 2010, we will provide a full day of training which will include CPR and First Aid Refresher training. Each of these training modules is four hours in length. On an annual basis, we conduct CPR training since the certification is only good for one year. On a triannual basis we additionally conduct First Aid Training since that certification is good for three years.
- 9. The expenses for this cost consist of both contractor costs and expenses associated with materials. In the first rate year the contractor cost is \$180K and in rate year three the contractor cost is \$45K. In the first rate year the material expense will be \$161K and in rate year three the cost will be \$40K. The material costs consist of:
- a. American Red Cross DVDs
- b. Manikins, lungs and heads
- c. Sani-wipes
- d. Standard first aid certification cards
- e. Participant Guides
- f. Breathing barriers, face shields, gloves
- g. Gauze rolls, first aid kits, bloodborne pathogen kits
- h. Instructional manuals
- 10. The contractor costs are provided above for rate year one and three. The costs associated with the contractors are the average hourly rate of pay they receive for the number of hours of training they conduct. Their average hourly rate of pay is \$53 an hour.
- 11. We will construct our schedule in September of 2009 for the training of these 6,500 employees. In 2007, we conducted a total of 221 classes. For the first ten months of 2007, we conducted an average of 20 classes per month and then conducted a total of 24 classes in the last two months.