



Philip A. DeCicco
Vice President and Deputy General Counsel
New York Regulatory

December 15, 2017

VIA ELECTRONIC FILING

Hon. Kathleen H. Burgess, Secretary
New York State Public Service Commission
Agency Building 3
Albany, New York 12223-1350
E-mail: secretary@dps.ny.gov

Re: Case 15-G-0171 - In the Matter of a Natural Gas Incident at 310 Paige Street, Schenectady on August 10, 2014, in the Service Territory of Niagara Mohawk Power Corporation d/b/a National Grid

Dear Secretary Burgess:

On December 16, 2016, the New York State Public Service Commission issued an Order conditionally approving the Joint Proposal (dated June 2, 2016) between Niagara Mohawk Power Corporation d/b/a National Grid (“Company” or “NMPC”) and Department of Public Service Staff in the above-referenced matter. The Joint Proposal resolved a penalty proceeding relating to a natural gas incident that occurred at 310 Paige Street, Schenectady, New York on August 10, 2014.

In the Joint Proposal, the Company committed to creating a \$500,000 deferral, at shareholder expense, to be used to develop a remote meter valve technology pilot program. Other commitments in the Joint Proposal involve enhancements to the Company’s process for addressing inactive accounts, including (i) reviewing and modifying NMPC’s call center script to solicit information on future account activity, (ii) analyzing gas usage data to prioritize meter locks, and (iii) working with municipalities in the service territory to identify vacant properties. The Company also agreed to relocate inside meters to outside the premises, where feasible.

As required by the Joint Proposal, the Company is providing an update on the status of the remote valve pilot program and other items discussed in the Joint Proposal. Attachment 1 is a summary of the status of the Company’s commitments in the Joint Proposal. The Company’s implementation plan for the remote valve pilot program was submitted with our last update report in June. Attachment 2 is the implementation plan with updates. Please note the time frame for development and deployment of the part of the implementation plan for valve installation, actuation and data management has been extended to take advantage of synergies with the Company’s storm hardening program. This will not affect the timing for installation of the 100 remote meter valves.

Please call me with any questions at 929-324-4543.

Very truly yours,
Philip A. DeCicco

cc: Diane T. Dean, Esq.

Attachment 1

Item	JP Provisions	Status
Remote Valve Pilot	The Company will install remote meter valve technology in a pilot program; NMPC will develop the project scope and timeline for the Remote Valve Pilot in consultation with DPS Staff. Company must notify Staff in writing when expenditures for the Remote Valve Pilot reach \$500,000	The Company has developed an implementation plan for the remote valve pilot. The pilot program will target deployment of 100 remote valves at customer premises with inside services in NMPC's service territory. See Attachment 2 for the updated implementation plan.
Call Center Procedures	NMPC will review and modify, in consultation with DPS Staff, its Call Center procedures and script for customers requesting service disconnections to include clear, direct questions designed to (i) elicit information on future use/occupancy of the premises and (ii) ensure that customers are informed as to the Company's next steps to secure the meter.	The Company developed and implemented new Call Center procedures addressing the items in the Joint Proposal. Copies of the new procedures were shared with DPS Staff.
Gas Usage Data Analysis	NMPC will monitor meter reading data for gas usage on inactive accounts. NMPC will actively investigate any inactive account for a meter lock/service cut when meter readings suggest the account is using gas.	The Company monitors meter reads. When it appears that an inactive account is still using gas, the account is investigated with the intent to secure the service.
Communications with Municipalities Vacant Properties	NMPC will begin developing communication protocols with local municipalities and/or counties in its service territory to assist NMPC in identifying vacant properties with active gas accounts.	This work is ongoing. The Company has contacted various municipalities to (i) remind them that it is not safe to leave gas service connected to a vacant building, (ii) inform them that the Company needs their help to identify vacant and abandoned properties, and (iii) start to establish a cooperative process to

		locate vacant properties and, when necessary, secure access to the premises. A listing of the municipalities that have been contacted is attached as Attachment 3.
Meter Relocations	<u>Relocation Procedures</u> - modify the Company's inside meter relocation procedures; will relocate meters unless except in certain circumstances (<i>e.g.</i> , the customer refuses permission, the gas meter should not be moved outside for safety reasons).	The Company has updated its meter relocation procedure (CNST 06009 – Meter/Service Relocation Guidelines) consistent with the Joint Proposal. This revised procedure was filed with DPS Staff and became effective March 15, 2017.
	<u>Annual Reporting</u> - supplement the Company's annual reporting on meter relocations to include, for the gas service lines relocated or replaced, the number of meters moved outside and, for the meters that were not moved outside, the specific reason why any meter was not moved.	The Company began including this information in its Inside Gas Meter/Services Report for the period ending December 31, 2016. The report now includes information on why certain inside meters were not moved outside. The Company's last Inside Gas Meter/Services Report (for the period ending June 30, 2017) is attached.
Paige Street Outreach	Initiate a special outreach and education program targeted to the Paige Street community, holding at least one community meeting to describe the incident, the measures that the Company has taken or will take, and what the community can do to reinforce the Company's efforts	An outreach and education meeting was held on February 2, 2017 in Schenectady, New York. The Company presented on various gas safety topics, including efforts to address inactive gas accounts. The meeting was well attended by members of the community.

Attachment 2

PAIGE STREET REMOTE METER VALVE PILOT

Niagara Mohawk Power Corporation (NMPC) will implement a remote gas meter valve pilot program as described in the settlement agreement resolving the Paige Street matter (Case 15-G-0171). The program will install 100 remote service valves at customer premises with inside gas meter sets that are prone to inactive accounts due to access issues (Can't Get In's (CGIs)). NMPC will monitor the monthly progress of the plan, compliance requirements, installation and cost, and provide regular progress reports to Gas Safety Staff of the Department of Public Service.

Implementation Leads

<i>Executive Sponsor:</i>	John Stavrakas
<i>Owners:</i>	Dan D'Eletto; Saadat Khan

Proposal to Implement Program

Gas Distribution Engineering will work with Gas Pipeline Safety & Compliance, Customer Meter Services, Information Technology, and Gas Work Methods and Standards to implement the remote meter valve pilot program as follows:

Action Item	Timing	Process Owner and Support
<p>Develop a list of candidates (customer premises) for installation of Remote Meter Valves</p> <ul style="list-style-type: none">• Review inactive account locations during last two years• Identify areas with high building vacant rate, targeting uncontrolled services and multi-meter services up to and including 3 meter sets.• Assign risk ranking to each candidate based on historic CGI frequency. <p>Full implementation will be complete approximately 15 months following final approval of plan.</p>	<p>March 2017 – April 2017 (Complete)</p>	<p>Gas Distribution Engineering – Saadat Khan</p> <p><u>Process Support</u> Gas Pipeline Safety – Dan D'Eletto</p>

<p>Validate Remote Meter Valve functionality and installation method through vendor demonstration</p>	<p>May 2017 - June 2017 (Complete)</p>	<p>Customer Meter and Service (CMS) – Brian Sano</p> <p><u>Process Support</u></p> <p>Gas Work Methods and Standards – Perry Sheth</p> <p>Gas Pipeline Safety – Dan D’Eletto</p> <p>CMS – Brian Sano</p> <p>Gas Distribution Engineering – Saadat Khan</p>
<p>Develop and deploy plan for valve installation, actuation and data management</p> <ul style="list-style-type: none"> • Use of QR codes to house valve inventory in SharePoint database. • Update AMR reading equipment to allow closing of remote service valve • Update CSS to reflect premises/ meters with valves • Align pilot program with storm hardening project in areas where system enhancements are already being developed. (Meter Statuses, Field Data Capture systems)* <p>Create daily report for notification of pending orders at a premises containing a valve</p> <p>*Synergies between storm hardening program and this pilot have been recognized and we will leverage system enhancements being created for storm hardening, to the extent</p>	<p>July 2017 – April 2018</p>	<p>Gas Distribution Engineering – Saadat Khan</p> <p><u>Process Support</u></p> <p>Billing Management – Patricia Graham</p> <p>Gas Pipeline Safety – Dan D’Eletto</p>

<p>possible and practical without delaying the timing outlined in this document.</p>		
<p>Develop procedure to install remote meter valves</p> <p>The procedure has been drafted and is under internal review.</p>	<p>July 2017 – September 2017</p>	<p>Gas Work Methods and Standards – Perry Sheth</p> <p><u>Process Support</u></p> <p>Gas Distribution Engineering – Saadat Khan</p> <p>Gas Pipeline Safety – Dan D’Eletto</p> <p>CMS – Brian Sano</p>
<p>Procure and warehouse Itron 500G remote meter valve variant</p>	<p>January 2018 - March 2018</p>	<p>CMS – Brian Sano</p> <p><u>Process Support</u></p> <p>CMS -- Brian Sano</p> <p>Gas Distribution Engineering – Saadat Khan</p>
<p>Schedule appointments for installation of valves</p>	<p>March 2018 – September 2018</p>	<p>CMS – Brian Sano</p>
<p>Install one hundred (100) remote meter valves</p>	<p>April 2018 – October 2018</p>	<p>CMS – Brian Sano</p> <p><u>Process Support</u></p> <p>Gas Distribution Engineering – Saadat Khan</p>

Develop lessons learned	November 2018	<p>Gas Distribution Engineering – Saadat Khan</p> <p>Gas Pipeline Safety – Dan D’Eletto</p> <p>CMS – Brian Sano</p> <p>Gas Work Methods and Standards – Perry Sheth</p> <p>Billing Management – Patricia Graham</p>
Track progress of implementation plan	Monthly	<p>Gas Distribution Engineering – Saadat Khan</p> <p><u>Process Support</u> Gas Pipeline Safety – Dan D’Eletto</p>
Monitor remote service valve operation and performance	April 2018 – April 2019	<p>Gas Distribution Engineering – Saadat Khan</p> <p><u>Process Support</u> Gas Pipeline Safety – Dan D’Eletto</p>

July 31, 2017

VIA ELECTRONIC MAIL

NYS Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350
Attn: Mr. Michael Worden
Managing Director – Utility Rates and Services

Re: Case No. 12-G-0202 – Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Gas Service

Dear Mr. Worden:

Enclosed are the following reports provided on behalf of Niagara Mohawk Power Corporation d/b/a National Grid (“NMPC”), pursuant to the March 15, 2013 Joint Proposal in Case 12-E-0201 and 12-G-0202 (“NMPC JP”):

Inside Gas Meter/Services Report (“Inside Services Report”) for the period ending June 30, 2017. The Inside Services Report is submitted pursuant to Section 10.4 of the NMPC JP, and includes information on (i) the total number of inside meter sets remaining, (ii) the total number of inside meter sets inspected for atmospheric corrosion in the preceding six months, (iii) the total number of inside meter sets renewed and left inside, and (iv) the total number of inside meter sets renewed and relocated outside. Pursuant to the Joint Proposal adopted by the Commission in Case 15-G-0171 (In the Matter of a Natural Gas Incident at 310 Paige Street), the Company is (i) providing information on the reasons why inside meters were not moved outside and (ii) the Company has amended its procedures to eliminate the plastic insertion exception for relocating inside meters.

Leak Prone Pipe Report (“LPP Report”) for the period ending June 30, 2017. The LPP Report is submitted pursuant to Section 10.1 of the NMPC JP. The LPP Report details leak prone pipe removal mileages, main locations by region and costs. Please note that the LPP removal information for The Brooklyn Union Gas Company d/b/a National Grid NY (“KEDNY”) and KeySpan Gas East Corporation d/b/a National Grid (“KEDLI”) is now reported separately pursuant to the Joint Proposal adopted by the Commission in Cases 16-G-0058 and 16-G-0059.

If you have any questions regarding the information contained in the attachment, please contact me at 315-428-6531.

Yours truly,

/s/ Laurie T. Brown

Laurie T. Brown

Director, Regulatory & Policy – Gas Infrastructure

Inside Services Report

Niagara Mohawk Power Corporation
June 2017

Total inside meter sets as of June 2017 - **205,256**

	<u>CY2013</u>	<u>CY 2014</u>	<u>CY 2015</u>	<u>CY 2016</u>	<u>CY 2017</u>
Inside meter sets inspected for atmospheric corrosion	17,099	46,436	26,191	26,456	16,689
Inside meter sets renewed and left inside	180	713	934	508	441
Inside meter sets renewed and relocated outside	108	738	126	2,340	1,285

Row Labels	Count of Primary Reason Work Not Completed
Customer Refused Access after Education	100
Excessively high interior or exterior restoration costs	26
Service location interferes with pedestrian traffic	27
Service location subject to other damage	52
Service location subject to vehicular damage	78
Service renewed by insertion (exemption 16 NYCRR 255.353 (b))	64
Service supplies multi-meter header	80
Grand Total	441

2017 LPP Report--Period Ending June 30, 2017			
National Grid Company	Targeted Mileage (CY)	Mileage Retired (CY)	Cost (FY18) \$000 (2)
NMPC	52.3	14.9	
East	31.9	9.3	\$10,056.2
Central	18.2	4.1	\$4,539.6
Opportunity (1)	2.2	1.5	
Total	52.3	14.9	\$14,595.8
NMPC Urban (Proactive)			
Albany	10.0	3.0	\$4,677.2
Schenectady	7.1	2.2	\$2,517.8
Troy	6.3	1.9	\$1,107.7
Syracuse	11.8	3.6	\$3,287.4
Utica	0.4	0.1	\$129.2
Total Urban	35.6	10.8	\$11,719.2
NMPC Non-Urban (Proactive)	16.7	4.1	\$2,876.5
(1) Includes LPP retired in connection with public works, reliability programs, etc.			
(2) Cost data are preliminary.			

Attachment 3

1. Larger Cities Contacted:

City of Albany

City of Schenectady

City of Troy

City of Syracuse

City of Watertown

City of Utica

Follow up meetings are being scheduled with each City to work on plans to identify vacant properties and work jointly to establish ongoing plans to identify those properties and acquire access as needed.

See Attached letter sent to each city.

- 2. As part of National Grid's annual outreach meetings with each county emergency management office, National Grid plans to discuss the topic of Vacant Buildings, the safety concern, and plans to work with each county as necessary to identify any properties by County.**

See Attached Discussion Document to be covered at these meetings:



Laura J. Poltynski
Regional Executive
Community and Customer Management

December 6, 2017

Mayor Kathy M. Sheehan
City of Albany
24 Eagle Street, Room 102
Albany, NY 12207

Dear Mayor Sheehan:

Re: IMPORTANT Natural Gas Safety Notice – Vacant Buildings

The Safety of our Communities is our mutual number one priority, and we want to remind you of a critical safety precaution.

It is **not safe** to leave utilities connected to a vacant property.

The natural gas service must be properly cut off below grade and the meter removed. Leaving the natural gas service connected to a vacant property could cause a gas leak resulting in a fire and potential loss of life and property or could lead to undetected gas leaks at a later date.

National Grid needs to secure gas meters immediately after becoming aware of any vacant properties. We can often only do this by working with you and your departments of codes enforcement and public safety in times when gaining access to secure a property becomes an issue for us.

National Grid's desire is to establish proactive and continuous cooperation with your municipality to ensure no vacant buildings are left with active gas service to them. We want to work together to mitigate risks.

Steps that departments such as police, fire and codes enforcement can take would include but are not limited to; notifying National grid when a premise has been deemed uninhabitable for any reason (fire, flood or structural damage requiring evacuation), when a property has been foreclosed on and ownership transfers to the city or county, when a vacant property is susceptible to break-ins, vandalism or other unauthorized interference.

Please help us keep your community safe. You can call National Grid at any time to make field visits for the purposes of securing gas service and any other emergency purposes. Call National Grid at 1-800-892-2345 if you become aware of any properties that are vacant, and we will make arrangements to terminate the gas service properly.

If you smell gas or suspect a gas leak, call 911 or National Grid Immediately.

Thank you for your cooperation on this very important matter. I will be following up with you to set up a meeting to discuss our mutual plans to work together on this issue.

Sincerely,

Laurie J. Poltynski

cc: Michael DiAcetis, Nat'l. Grid



Laura J. Poltynski
Regional Executive
Community and Customer Management

December 6, 2017

Mayor Gary McCarthy
City of Schenectady
105 Jay Street
Schenectady, NY 12305

Dear Mayor McCarthy:

Re: IMPORTANT Natural Gas Safety Notice – Vacant Buildings

The Safety of our Communities is our mutual number one priority, and we want to remind you of a critical safety precaution.

It is **not safe** to leave utilities connected to a vacant property.

The natural gas service must be properly cut off below grade and the meter removed. Leaving the natural gas service connected to a vacant property could cause a gas leak resulting in a fire and potential loss of life and property or could lead to undetected gas leaks at a later date.

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Sincerely,

Laurie J. Poltynski

cc: Thomas Wind



Alberto Bianchetti
Regional Executive
Community and Customer Management
alberto.bianchetti@nationalgrid.com
315.452.7777

December 7, 2017

Mayor Stephanie A. Miner
City of Syracuse
233 East Washington St.
Syracuse, NY 13202

Dear Mayor Miner:

Re: IMPORTANT Natural Gas Safety Notice – Vacant Buildings

The Safety of our Communities is our mutual number one priority, and we want to remind you of a critical safety precaution.

It is **not safe** to leave utilities connected to a vacant property.

The natural gas service must be properly cut off below grade and the meter removed. Leaving the natural gas service connected to a vacant property could cause a gas leak resulting in a fire and potential loss of life and property or could lead to undetected gas leaks at a later date.

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Steps that departments such as police, fire and codes enforcement can take would include but are not limited to; notifying National grid when a premise has been deemed uninhabitable for any reason (fire, flood or structural damage requiring evacuation), when a property has been foreclosed on and ownership transfers to the city or county, when a vacant property is susceptible to break-ins, vandalism or other unauthorized interference.

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If you smell gas or suspect a gas leak, call 911 or National Grid Immediately.

Thank you for your cooperation on this very important matter. I know your time in office is short and we will be following up with the new administration to set up a meeting to discuss our mutual plans to work together on this issue. Best of luck in your future endeavors.

Sincerely,

Alberto Bianchetti

CNY Regional Executive

National Grid

cc: Beth Rougeux, City of Syracuse

Paul Linnertz, City of Syracuse

Ken Towsley, City of Syracuse

Christopher Gorman, National Grid



Laura J. Poltynski
Regional Executive
Community and Customer Management

December 6, 2017

Mayor Patrick Madden
City of Troy
433 River Street
Troy, NY 12180

Dear Mayor Madden:

Re: IMPORTANT Natural Gas Safety Notice – Vacant Buildings

The Safety of our Communities is our mutual number one priority, and we want to remind you of a critical safety precaution.

It is **not safe** to leave utilities connected to a vacant property.

The natural gas service must be properly cut off below grade and the meter removed. Leaving the natural gas service connected to a vacant property could cause a gas leak resulting in a fire and potential loss of life and property or could lead to undetected gas leaks at a later date.

National Grid needs to secure gas meters immediately after becoming aware of any vacant properties. We can often only do this by working with you and your departments of codes enforcement and public safety in times when gaining access to secure a property becomes an issue for us.

National Grid's desire is to establish proactive and continuous cooperation with your municipality to ensure no vacant buildings are left with active gas service to them. We want to work together to mitigate risks.

Steps that departments such as police, fire and codes enforcement can take would include but are not limited to; notifying National grid when a premise has been deemed uninhabitable for any reason (fire, flood or structural damage requiring evacuation), when a property has been foreclosed on and ownership transfers to the city or county, when a vacant property is susceptible to break-ins, vandalism or other unauthorized interference.

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Thank you for your cooperation on this very important matter. I will be following up with you to set up a meeting to discuss our mutual plans to work together on this issue.

Sincerely,

Laurie J. Poltynski

cc: Robert Shevy, Nat'l. Grid



December 8, 2017

Alberto Bianchetti
Regional Executive
Community and Customer Management
alberto.bianchetti@nationalgrid.com
315.452.7777

Mayor Robert Palmieri
1 Kennedy Plaza
Utica, NY 13502

Dear Mayor Palmieri:

Re: IMPORTANT Natural Gas Safety Notice – Vacant Buildings

The Safety of our Communities is our mutual number one priority, and we want to remind you of a critical safety precaution.

It is **not safe** to leave utilities connected to a vacant property.

The natural gas service must be properly cut off below grade and the meter removed. Leaving the natural gas service connected to a vacant property could cause a gas leak resulting in a fire and potential loss of life and property or could lead to undetected gas leaks at a later date.

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Sincerely,

Alberto Bianchetti

National Grid

Cc: Charles Greco, City of Utica

John Kelly, City of Utica

David Farina, City of Utica

Diane Benedetto, National Grid



December 8, 2017

Alberto Bianchetti
Regional Executive
Community and Customer Management
alberto.bianchetti@nationalgrid.com
315.452.7777

Mayor Joseph Butler, Jr.
City Hall
245 Washington St.
Watertown, NY 13601

Dear Mayor Butler:

Re: IMPORTANT Natural Gas Safety Notice – Vacant Buildings

The Safety of our Communities is our mutual number one priority, and we want to remind you of a critical safety precaution.

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Sincerely,

Alberto Bianchetti

National Grid

Cc: Sharon Addison, City of Watertown

Gerald Haenlin, National Grid

