David C. Bovee
Project Manager
Gas Engineering

January 13, 2017

Hon. Kathleen H. Burgess
Secretary
State of New York Public Service Commission
Albany, NY 12223-1350

RE: Case 16-T-0473 - Certified Main–5 (CM-5)
Responses to Public Comments

Dear Secretary Burgess:

Rochester Gas and Electric Corporation (RG&E) filed with the New York State Public Service Commission on August 22, 2016, an application for a *Certificate of Environmental Compatibility and Public Need* under Article VII of the New York State Public Service Law for construction of the Certified Main-5 (CM-5) gas distribution pipeline. On November 29, 2016, a public statement hearing was held before Commissioner Diane Berman and Administrative Law Judge Dakin Lecakes during which members of the public asked questions. Questions were also raised in comments posted in the public comment section on the Commission's DMM site for this project. In this letter, RG&E provides responses to those questions and comments.

There were 15 postings dated between September 22, 2016 and December 16, 2016.

The responses are presented by topic rather than by reference to specific commenters, since many persons raise similar questions. Property owner-specific questions will be addressed in individual easement negotiations. Some comments do not include questions. Questions submitted by Daniel D. D'Angelo have already been addressed, and the answers were posted on the DMM (see DMM File No. 8), so they are not repeated here except to the extent that they were raised by other persons.

Questions are in italics followed by answers in bold face.

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Q1. Will the extension of a gas main on Ballantyne Road be confirmed prior to commencement of CM-5?

A1. RG&E is interested in providing gas to new customers and routinely extends gas mains to service them. Several homeowners at the corner of Ballantyne and Humphrey Roads are already gas customers. The existing farm tap will be reconstructed and a gas main operating at a maximum pressure of 60 psig will be extended east along Ballantyne Rd up to property address 745. The preliminary design plan showing the location of the main has been provided to Department of Public Service Staff.

Q2. Why wasn't CM-5 aligned adjacent to existing Certified Main No. 1 (CM-1) and what were the criteria for evaluating the route?

A2. Feasibility analysis was performed on the project area as a whole, identifying several project routes for consideration. This data was then presented to the various public agencies, and from the data collected and the input received, the current route was determined to be the least impactful based upon the range of factors listed on page 32 of the Article VII Application. Of specific concern was that paralleling CM-1 would cause between 2 and 3 acres of additional forested wetland conversion and up to 8 additional acres of emergent or scrub/shrub wetland disturbance from the proposed route. Also, many new homes have been constructed along the south end of CM-1 since its original installation, thereby limiting a parallel route in this area. While a route paralleling CM-1 would have been shorter, it would have caused a greater environmental impact and affected more property owners.

Q3. Why does the gas main cross agricultural fields?

A3. The Town of Chili has an abundance of agricultural fields. They cannot all be completely avoided. Since gas pipelines are underground (typically 48" of cover required in agricultural fields) and there are no above ground structures that interfere with rotational farm crops, the impacts to fields and pasture are temporary. Additionally, care was taken to identify and specify endophyte free seed mixtures for re-establishing ground cover in pastures. The current pipeline route considers the ability of farmers to continue using land after construction, as well as considerations of constructability, wetland disturbance, protection of cultural resources, and many other factors.

Q4. How is the pipeline designed to be safe?

A4. Safety is the primary objective for the design of the Certified Main 5 (CM-5) pipeline. Safe design is accomplished through compliance with code requirements that are developed at the State and Federal level. Specific codes apply here based on the operating pressure of the pipe. RG&E complies with New York State Department of Public Service Regulations found at 16 NYCRR Part 255 and Federal Regulations found at Title 49,

Subtitle B, Chapter I, Subchapter D, Part 192 Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards.

16 NYCRR Part 255.3(a) (34) defines a Transmission line as a pipeline operating at a hoop stress of 20% or more of the "Specified Minimum Yield Strength" (SMYS) of the pipe material. CM-5 is designed to operate at a hoop stress less than 20% of the SMYS of the pipe material and is defined a Distribution Main. 16 NYCRR Part 255.901 prescribes that the requirements of an Integrity Management Plan (IMP) apply to pipelines defined as Transmission. Since CM-5 is considered a Distribution Main, it is not subject to the provisions of an IMP, and therefore does not require the performance of calculations related to high consequence areas, potential impact circles and identified sites. These criteria do not apply to CM-5. .

16 NYCRR Part 255.101 through 115 provides the methodology for determining the maximum allowable operating pressure (MAOP) of a pipeline considering the pipe material, pipe wall thickness, number of buildings in the area of the pipeline, pipe construction and maximum operating temperature. Using the specific design parameters proposed for the CM-5 pipeline, the Code would allow RG&E to operate the pipeline at a MAOP of 1,016 psig. This would result in a hoop stress of 50% of the SMYS and results in a Safety Factor of 2. RG&E is proposing to conservatively operate the CM-5 pipeline at a MAOP of 330 psig. This would result in a hoop stress of 16.2% of the SMYS and results in a Safety Factor of approximately 6.

The pipeline will be constructed using high quality materials under the supervision of RG&E and full-time inspection by a qualified third party. The pipeline will be subjected to a pressure test to ensure its integrity prior to being placed in service. Safety will continue to be a primary objective once the pipeline is in operation. Once the pipeline is operating, RG&E will continue to monitor the pipeline for leaks and protect it from the effects of corrosion and damage by outside parties for the life of the pipe based on 16 NYCRR Part 255 and RG&E Operating and Maintenance Procedure requirements.

The pipeline installation will be inspected by qualified persons. Welding will be certified to RG&E standards. Cover over the pipe will be a minimum 36". The pipeline will be designed to be piggable, which means that equipment can be sent through the main to inspect and monitor its condition. CM-5 will be protected by a rectified cathodic protection system.

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Testing requirements for CM-5 are governed by 16NYCRR Part 255.505 for pipelines operating at 125 psig or greater. In this case RG&E is using hydrostatic (water) testing to ensure discovery of all potentially hazardous leaks and will hold the test for a minimum of 12 hours. The pressure testing performed by RG&E will be witnessed and certified by an inspector from the Department of Public Service.

Overall, the design and operation of CM-5 pipeline will meet and/or exceed all regulations and all provisions of the New York State Department of Public Service's Environmental Management and Construction Standards and Practices, and all RG&E standards

Q5. What is the status of a gas smell mentioned at the public statement hearing?

A5. Any reported gas smell is taken very seriously. A gas smell detected in an enclosed space must be addressed immediately. Smells detected outdoors are classified in accordance with 16 NYCRR Part 255 requirements regulations. In the vicinity of Humphrey and Scottsville-Chili Road where smells were reported, RG&E was aware of and prioritized the circumstance for repair. Six leaks were discovered and repaired in December 2016 across from #652 Scottsville-Chili Road. Subsequent leak surveys were performed in the area and additional leaks were found across from #640 Scottsville-Chili Road. These additional leaks will be repaired in early 2017.

Q6. How will RGE access the pipeline with their equipment in the future?

A6. RG&E will negotiate with individual property owners for the rights it needs to construct and maintain the pipeline. While RG&E envisions accessing the pipeline from public road crossings where practical, RG&E also commonly obtains access rights over the land the easement crosses. RG&E has only the rights granted under the easements.

Q7. Why not replace CM-1? Where does the next line get placed?

A7. RG&E will continue to use CM-1 as a distribution main. At some future time, when the capacity of CM-1 needs to increase or the condition of the main becomes an issue, CM-1 would be considered for replacement. RG&E has no plans at this time to replace CM-1 within the area affected by the CM-5 project.

Q8. Why does RG&E require a 60 foot wide Permanent Easement?

A8. A sixty foot wide easement is necessary due to the diameter of the pipe and for the purpose of constructability and effective maintenance of the pipeline in future. The easement area will be used for equipment access, material staging, soil storage and erosion control measures for both construction and future maintenance activities. EM&CS&P section 3.3.1 provides generalized recommendations for easement widths for nominal pipeline diameters, but these recommendations are not mandated requirements. Experience and judgment are necessary to determine the space requirements.

Q9. Will drainage tile repairs be monitored after construction?

A9. Yes. RGE will take photos prior to construction and walk areas with landowners as requested to verify pre-construction field conditions. A plan for replacement and/or repair of drainage tiles will be prepared during the restoration phase in consultation with DPS staff, the New York Department of Agriculture and Markets (NYSDAM), and the property owner. Any post construction monitoring requirements will be specified in the Certificate. The typical monitoring and remediation period is two growing seasons after completion of restoration in active agricultural areas.

Q10. A series of answers to technical questions/comments related to the pipeline, installation, and operation.

A10. Answers to technical questions/comments.

a. As stated in A4 above, the code does not require a study of "identified sites", "high consequence areas", or "potential impact circles". This terminology only applies to Transmission pipelines operating at higher pressures and/or higher %SMYS that would be included in an Integrity Management Plan. By designing this main as a Distribution Pipeline below 20% SMYS, in a Class 3 area, and an effective safety factor of 6, the design is well within the guidelines of the code.

b. There are 25 owners of 32 properties crossed by the permanent and/or temporary easement. All have twice returned signed receipts for mailings concerning the project. See the introductory sections of the Article VII Application.

c. Pipeline corrosion is mitigated by a rectified cathodic protection system. See Sh 26 through SH 35 of the Article VII Application.

d. The pipeline is 24" diameter. See page 1 of the Article VII Application.

e. The MAOP is 330 psig. See page 7 of the Article VII Application.

f. The operating pressure is 250 psig. See page 24 of the Article VII Application.

g. The wall thickness is 0.375 inches and this is an X65 pipe classification. See page 25 of the Article VII Application. It will be manufactured in accordance with API

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Specification 5L which involves compliance with ASTM A370, A751, E4, E8, E29, E83, E94, E165, E213, E273, E309, E570 and E709 as applicable and modified by subsequent revisions of the specification.

h. The source of steel is subject to a fair and ethical procurement process that requires compliance with the construction specifications as demonstrated by testing and inspection.

i. There are no compressor stations or pump stations associated with this application. See page 10 of the Article VII Application.

j. Emergency shutdown of CM-5 would be achieved by manually operated valves.

k. Depth of bury is 36" generally. In agricultural land depth increases to 48" and at road/stream/ditch crossings depth further increases to a minimum 72". See page 6 of the Article VII Application.

l. The Empire West Gate Station No. 16 is located in southwest Chili, along Scottsville-Chili Rd.

A copy of these responses is being mailed to each owner of land on which any part of the project is proposed to be located.

Sincerely,

David C Bovee

Digitally signed by David C Bovee
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