

New York State Electric & Gas

STRAY VOLTAGE TEST

And

FACILITY INSPECTION

Report on the results of stray voltage tests and facility inspections

for the period ending on December 31, 2011

February 15, 2012

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I. Background

The New York State Public Service Commission's ("PSC" or "Commission") Electric Safety Standards Order issued on January 5, 2005 (Case 04-M-0159), with subsequent revisions issued on July 21, 2005, December 15, 2008, and July 21, 2010 (Case 10-E-0271), (collectively referred to herein as the "Safety Standards" or "Order"), require electric utilities in New York State, including New York State Electric & Gas ("NYSEG" or the "Company") to test annually all of their publicly accessible transmission and distribution facilities for stray voltage and to inspect their electric facilities every five years.

This report describes New York State Electric & Gas's Stray Voltage Detection Program and Equipment Inspection Program conducted in 2011.

II. Company Overview

NYSEG is located in upstate New York and serves approximately 860,609 electric customers. NYSEG covers an area of about 18,359 square miles or 40% of upstate New York, and serves a primarily rural area composed of 149 small cities and villages.

NYSEG's electric delivery infrastructure consists of 519 substations, 49,758 underground facilities and 5,412 streetlight/traffic signal facilities. This system includes an estimated 820,049 distribution structures and 76,841 transmission structures.

III. Stray Voltage Testing Program

During the period ending December 31, 2011, NYSEG conducted stray voltage testing of all its publicly accessible transmission and distribution facilities that are capable of conducting electricity, and all Company and non-Company owned metallic streetlights and traffic signals. The Company also tested all publicly accessible third party facilities in close proximity to NYSEG's system components identified with elevated voltage.

In addition, and in compliance with the Order, NYSEG:

- 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 party 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 utility-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.

Of the 966,013 facilities visited, 214,670 did not require stray voltage testing because these are wood poles that have no attached appurtenances capable of conducting electricity; their electrically conductive appurtenances are not accessible to the public (pre-wired wood); the facilities are enclosed in fiberglass (non-conductive materials); de-energized facilities; and/or the facilities are deemed inaccessible to the public.

Structures Inaccessible to the Public

There are several types of Inaccessible structures as described below. Of the 966,013 facilities visited, 1,328 were deemed Inaccessible to the public. If the contractor could not reach the structure to perform a test, it was identified as “Inaccessible” and all other pertinent data was collected in the field. Contractors made every attempt to locate and test all structures. Inaccessible structures include:

- a. Private Property – The structure was not tested if it was located on private property and was inaccessible due to walls, fences or barriers such as a locked gate, if excavation or bush/tree removal was required, or if there was unauthorized construction around the structure.
- b. NYSEG Property – Structure located on Company property, such as substations, are accessible only to Company personnel and authorized contractors.
- c. Buried / Paved Over – The structure was not tested if it had been covered over with dirt, pavement, or other foreign objects that would prohibit public access and prevent testing the structure. Contractors noted the structure ID on the issued maps and turned them in to Maintenance Engineering for verification with the Maps and Records Department. If Maps and Records confirmed that the structure does exist, company and contractor crews followed up and attempted to locate, uncover, and test the structure. If the structure could not be found, it was then considered removed from the field, and revisions to mapping were generated.
- d. Inside Building – If a tester identified a structure as being inside a building, NYSEG personnel verified that the structure was actually inside the building. If the NYSEG personnel verified that the structure was accessible to the public, a test was performed. Typically, customer owned equipment that is inside a building is in a locked equipment room that is accessible to authorized personnel only.
- e. Limited Access Highways – Structures located on highways, exit and entrance highway ramps. The performance of stray voltage testing would constitute an unacceptable risk to the employee.
- f. Dangerous Terrain – Poles located on cliffs and other dangerous terrain are generally inaccessible to Company personnel and are approached only under urgent circumstances. The performance of stray voltage testing would constitute an unacceptable risk to the employee.

IV. Facility Inspection Program

The Safety Standards require NYSEG to visually inspect approximately 20% of its facilities annually, resulting in 100% inspection of its electric facilities every five years.

The objective of all inspections is to conduct a careful and critical examination of an electric facility by a qualified individual to determine the condition of the facility and the potential to cause, or lead to safety hazards, or adverse effects on reliability.

Inspections conducted during routine maintenance and other work not directly related to the inspection program count as an inspection visit, provided that the inspection is performed using the same safety and reliability criteria and to the same extent as would otherwise be required under the Electric Safety Standards.

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

Level I – Repair as soon as possible but not longer than one week. A Level I deficiency is an actual or imminent safety hazard to the public or poses 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.

Level II – Repair within one year. A Level II deficiency is 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.

Level III – Repair within three years. A Level III deficiency does not present immediate safety or operational concerns and would likely have minimum impact on the safe and reliable delivery of power if it does fail prior to repair.

Level IV – Condition found but repairs 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 shall be used for future monitoring purposes and planning proactive maintenance activities.

In accordance with the PSC requirements, when a temporary repair is located during inspection or performed by the company, best efforts are put forth 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 require extensive repair activity. The Company puts forth best efforts to conduct permanent repairs in the field, and only construct a temporary repair if/when absolutely necessary. For cycle year 2011, NYSEG has no temporary repair exceptions to report.

V. Company Facilities

Structure Categories

NYSEG has approximately 750,015 individual facilities that require testing for the presence of stray voltage. These facilities are broken down into four main categories including:

Distribution Overhead – There are approximately 608,471 distribution pole structures that require testing for the presence of stray voltage in NYSEG’s territory. The testing criteria include all utility-owned or joint use wooden poles with utility electrical facilities located on both public thoroughfares and customer property, including backyards or alleys. Stray voltage tests are 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 inspection programs.

Underground Facilities – There are 37,020 underground facilities that require testing for the presence of stray voltage that comprise NYSEG’s system. The testing criteria are comprised of subsurface structures, including above ground pad-mounted structures. Included in the underground facilities are pad-mount switchgear cases, pad-mount 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.

Street lights and Traffic Signals – There are approximately 17,252 metallic street lights and approximately 15,986 traffic signals within NYSEG’s service territory that require testing for the presence of stray voltage. This total includes metallic street lights owned by NYSEG with the balance of the equipment owned by various municipalities. The testing criteria include all metallic streetlights, traffic signals, and pedestrian crosswalk signals located on publicly accessible thoroughfares. All stray voltage testing of street lights is performed at night while the fixtures are energized. Area and street lighting that is privately owned is not included in the stray voltage testing program, as per the Order’s requirements. All Company-owned streetlights are included in the facility inspection program.

Transmission Structures – There are 70,767 individual poles/towers that require testing for the presence of stray voltage that comprise NYSEG’s transmission system. The testing criteria is comprised of all structures, guys, and down leads attached to the structures. Transmission structures support circuit voltages of 34.5 kilovolts and greater. Transmission poles as described above, with distribution under-build, are included in this transmission category. All transmission structures are included in both the stray voltage and facility inspection programs.

Substations – There are 519 substation fences that require annual testing for the presence of stray voltage in NYSEG’s territory.

VI. Annual Performance Targets

NYSEG performed the required stray voltage testing and facilities inspections in accordance with the requirements set forth in the Order.

In compliance with the Safety Standards, NYSEG has met the annual performance target for stray voltage testing of 100% of electric facilities and streetlights for the period ending December 31, 2011.

In addition, in compliance with the Safety Standards, NYSEG has met the second year annual inspection target of 20% of its electric facilities and the cumulative inspection target of 40% of its facilities for the period ending December 31, 2011.

The results are summarized in the table below.

Facility Inspection Program Results

Category	NYSEG Inspection Target	Actual Cumulative Inspected as of 2011
Overhead Distribution	40%	42%
Overhead Transmission	40%	44%
Underground	40%	37%
Streetlight	40%	52%

5-Year Inspection Performance Summary

Overhead Distribution Facilities

Inspection Year	Number of Overhead Distribution Structures Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	168,617	21%
2011	173,214	42%
2012		
2013		
2014		

Overhead Transmission Facilities

Inspection Year	Number of Overhead Transmission Facilities Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	20,143	26%
2011	13,869	44%
2012		
2013		
2014		

Underground Facilities

Inspection Year	Number of Underground Facilities Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	2,321	45%
2011	2,768	100%
2012		
2013		
2014		

Pad-mount Facilities

Inspection Year	Number of Underground Facilities Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	9,167	21%
2011	3,938	29%
2012		
2013		
2014		

Streetlights

Inspection Year	Number of Streetlights Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	1,970	36%
2011	848	52%
2012		
2013		
2014		

VII. Certifications

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 all of its publicly accessible electric facilities and street lights, as referred to in the body of the February 15 Report, and
- Inspected the requisite number of electric facilities.

The certifications are attached as Exhibit 1 of this report.

VIII. Analysis of Causes of Findings and Stray Voltage

All New York State utilities perform an inventory on all findings and report on the number of these findings each year. Section 1(f) of the December 15, 2008 Order defines a finding as “any 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 “voltage 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.” A Summary of Energized Objects for the manual program can be found in Appendix 2 of this report.

Generally, there are two types of reported findings; a confirmed voltage reading greater than or equal to 1 volt measured using a volt meter and 500 ohm shunt resistor which is the result of an abnormal power system condition, and a confirmed voltage reading greater than or equal to 1 volt measured using a volt meter and 500 ohm shunt resistor which results from the normal delivery and/or use of electricity. Utilities are required to report on all findings, regardless of whether or not the voltage is abnormal or normal to operating conditions. Inclusion of these normal occurring voltages in the total findings can result in the perception that there are more potentially hazardous voltage findings than actually exist. Our analysis of confirmed findings deemed normal to the operating system has shown a detection rate of .012% to our total system.

Causes of these findings include, but are not limited to, naturally occurring neutral to earth voltages (as part of a multi-grounded WYE power system); poor soil grounding conditions; load balance between phases; long low voltage single phase circuit spurs with high current loads; and/or proximity to transmission lines. Attempts to mitigate these conditions include a high cost, and there is no guarantee of resolution.

True hazardous voltages have been identified and mitigated through the stray voltage testing program. These voltages resulted from a variety of conditions including: deterioration of conductors; age of equipment; exposure to the elements; and various customer related issues. Through the efforts of the stray voltage testing program, NYSEG has been able to repair these issues and mitigate the danger associated with the elevated voltage.

Some distinction needs to be made between these two classes of findings: findings due to potentially hazardous Stray Voltage, and findings normal to the operating system. The following table contains a breakdown of the causes of Stray Voltage Findings identified through the 2011 manual testing effort:

Structure Type	Cause of Stray Voltage	Stray Voltages Found
Distribution	Ground rods	60
Distribution	Customer owned equipment	33
Distribution	Transformers/ Capacitors	16
Distribution	Guy Wire	11
Distribution	Defective Cutout/Lightening Arrestor	6
Distribution	Defective Insulator	4
Distribution	Vegetation	3
Distribution	Defective Primary Neutral Connection	2
Distribution	Loose Connections	1
Streetlights	City/Town Owned Equipment	10
Streetlights	Defective Light Fixture	10
Streetlights	Defective Neutral Connection- Light Pole	4
Streetlights	Customer Owned Equipment	2
Streetlights	Defective Conductor Connection- Light Pole	1
Streetlights	Defective Neutral Connection – Handhole	1
Transmission	Ground Rods	6
Transmission	Guy Wire	1
		171

In accordance with the PSC requirements; when a finding is discovered on an electric facility or streetlight during stray voltage testing, the Company is obligated to perform stray voltage testing on all publicly accessible structures and sidewalks within a minimum 30 foot radius of the electric facility or streetlight. In this year’s testing cycle 171 findings due to potentially hazardous stray voltages were found. A total of 42 additional objects were tested as a result of testing within a 30 foot radius. Of the 42 objects tested, 8 were energized associated with the initial tested structure. Five objects were mitigated when the initial tested structure was repaired, and 3 objects were referred to the customer to make final repairs.

IX. Analysis of Inspection Results

Overhead Distribution Structures

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
173,214	6,535	3.77%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	138	2.11%
2	1,159	17.74%
3	1,599	24.47%
4	3,639	55.68%
Total:	6,535	100%

Overhead Transmission Facilities

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
13,869	1,072	7.73%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	16	1.49%
2	187	17.44%
3	459	42.82%
4	410	38.25%
Total:	1,072	100%

Underground Facilities

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
2,768	15	.54%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	4	26.67%
2	7	46.67%
3	4	26.67%
4	0	0%
Total:	15	100%

Pad-mount Facilities

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
3,938	357	9.07%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	18	5.04%
2	78	21.85%
3	100	28.01%
4	161	45.10%
Total:	357	100%

Streetlights

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
848	2	.24%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	0	0%
2	1	.50%
3	1	.50%
4	0	0%
Total:	2	100%

In 2011, a total of 7,981 deficiencies were identified through scheduled inspections which represent a deficiency rate of about 4.10% of the total unique inspections performed.

Each and every year since the commencement of the Safety Standards Order in 2005, NYSEG has continually made improvements toward the administration of the Facility Inspection program. The results of these improvements have provided some additional benefits to the company.

The collection and management of data was centralized into a single program group to provide an effective way to communicate inspection progress and issues to and from field operations and inspectors. The asset data received has enhanced the quality of information we had in place identifying in more detail specific structure attributes giving us the ability to document accurate GPS locations in the field. Common training efforts were conducted among all field personnel through the centralized program group resulting in uniform standardized reporting of field conditions.

Other groups within the company have also capitalized on this information to assist them in their particular needs. Asset Management groups have used inspection information to

assist them in trending analysis and preparation of targeted maintenance efforts such as pole treatment and replacement projects, and other equipment issues. Vegetation Management groups routinely use inspection information to look for potential trouble spots where out of cycle trimming may be necessary.

X. Stray Voltage Testing and Inspection QA/QC Programs

Stray Voltage Testing QA/QC Program

Throughout the stray voltage testing effort, the testing contractor submits their testing data to NYSEG in the form of batch files. These batch files are submitted for multiple QA/QC reviews. The first review that takes place is for data accuracy. Batch files are scanned to ensure formatting and proper data is populated in each of the required fields. If approved, the file is loaded into the production database and a copy forwarded to the Global Positioning System (GPS) QA/QC Team for the second review to check the data for positional accuracy and content. If the data is not acceptable, the contractor is notified of such and the reasons for failure. The testing contractor remedies the problems and re-submits the file with corrections.

Following vendor batch file approval through the program administrator, the GPS QA/QC team loads the batch file into NYSEG's GIS database, SDE. The QA/QC team uses the GIS application Arc Map to evaluate and certify the testing results. The data, GPS location, test results and time stamp are recorded at each structure on Trimble GeoXt handheld devices with sub-meter GPS capability during the field testing effort. This collection method has been extensively used and successfully tested by NYSEG as an effective means of monitoring progress and ensuring the stray voltage testing contractor is acquiring all test points and delivering complete and accurate results. Additionally, the GPS QA/QC team employs the use of high level satellite ortho photography to verify positional accuracy.

The methodologies deployed to conduct the QA/QC evaluation are as follows:

- Upon data load into SDE, the level of digitized data points is checked and recorded to insure that the number of points does not exceed the expected level based on satellite position, interference (i.e. buildings, vegetation) and equipment capabilities. This level is generally < 1%. Also, at this time a gross high level check is made looking for gross geographical errors that would indicate a batch file processing error by the vendor. If either of these conditions is not acceptable the "batch" is rejected.
- Following the initial checks above, the batch data is overlaid on top of the previous years' data in Arc Map. All data is 100% evaluated against the prior testing effort plus some additional safeguards to be covered later. These methods have proven to be very effective in ensuring that all structures have been tested. The overall management of the process is through a grid system on which the field testing maps are based. As data accumulates throughout the year the grids are attributed to reflect their completeness based on structure type, i.e. Streetlights OK = Yes and so on.

- The next aspect of QA/QC effort is final certification by division. When we are notified by the vendor that a division is complete and all data has been submitted we initiate a final audit of the division. This is a final review of any missed structures and any new structures not tested. Any structures deemed “missed” are extracted into a shape-file (GIS database) and fed back to the vendor for follow up testing, thus completing a continuous feedback loop year to year to cover missed structures. At this time the QA/QC team does a high level grid check to make sure no map sheets were omitted.
- The additional safeguards mentioned above are as follows:
 - Duplicate testing of structures: The analysts are prompted to be aware of and flag any evidence of massive duplicate testing.
 - GPS time stamp anomalies: Analysts are aware to look for suspicious time intervals between structures, particularly on heavily digitized areas (i.e. 3 seconds between poles 300’ apart).

The QC team does a periodic review of the Stray Voltage data vs. The Corporate electrical distribution asset system called Smart-map. This evaluation allows us to identify any new or previously missed structures which are extracted and sent back to the vendor for testing.

Random Quality Assurance

On an ongoing basis, NYSEG performs many quality assurance measures to ensure testing data accuracy. These include, but are not limited to; investigations into inaccessible structures to determine the nature of inaccessibility, performance of individual testers, miscellaneous anomalies found in testing data, and checking circuit maps to ensure all structures have been visited. Problem testers are identified to the testing contractor and, if need be, removed from the testing effort. If needed, problem areas are retested in order to ensure testing accuracy. Any discrepancies found as a result of random data sampling checks like wrong town or street name and incorrect spellings are then corrected.

In addition to these measures, Field Coordinators conduct random field visits to ascertain that field contractors are performing tests on all required structures. During these visits, the Field Coordinator will observe testers performing their work to ensure they’re doing it correctly and answer any questions about map reading, structure IDs, and location of structures. The Field Coordinator also performs follow up on randomly chosen completed maps to check that all structures were tested and recorded properly.

Inspection QA/QC Program

NYSEG's inspection program is administered through the Inspection Tracking System (ITS) Group. The ITS Group monitors all company assets in a central database to ensure all planned inspections for the current year are performed.

The ITS Group randomly selects a sample set of reported repaired deficiencies throughout each division. This sample set contains all information regarding the deficiency including the cause and the reported repair effort and is given to the QA/QC Coordinators to be field evaluated. NYSEG performs field verifications in each of its thirteen divisions to assess the reported results from inspectors. QA/QC Coordinators visit the specific asset and validate whether the reported repair work has been made. Independent results of the verification effort are compared to the original reporting to assess effectiveness.

In addition, the ITS Group develops a random sample of assets from each of the circuits inspected in the current year. Administered by a third party of QA/QC Coordinators who are qualified to perform utility inspections, they are deployed to perform independent field inspections on these random assets. Results of their findings are compared with results submitted by the field inspectors to assess effectiveness.

Appendix 1 Stray Voltage Testing Summary

NYSEG	Total System Units	Units Completed	Percent Completed	Units with Voltage Found (>= 1.0v)	Percent of Units Tested with Voltage (>= 1.0v)	Units Classified as Inaccessible
Distribution Facilities	817,298	817,298	100%	199	0.024%	611
Underground Facilities	37,147	37,147	100%	0	0.000%	126
Street Lights / Traffic Signals	33,248	33,248	100%	33	0.099%	10
Substation Fences	519	519	100%	0	0%	0
Overhead Transmission	77,801	77,801	100%	61	0.078%	581
TOTAL	966,013	966,013	100%	293	0.030%	1,328

Appendix 2 Summary of Energized Objects

NYSEG	Initial Readings				Readings after Mitigation		
	1-4.4V	4.5-24.9V	>25V	Totals	< 1V	1-4.4V	>4.5V
	Distribution Facilities	159	37	3	199	156	36
Pole				0			
Ground	88	26	2	116	79	31	6
Guy	68	8	0	76	70	5	1
Riser	3	2	1	6	6	0	0
Other	0	1	0	1	1	0	0
Underground Facilities	0	0	0	0	0	0	0
Manhole/ Pull box				0			
Manhole				0			
Padmount Switchgear				0			
Padmount Transformer				0			
Vault-Cover/Door				0			
Pedestal				0			
Other				0			
Street Lights/Traffic Signals	4	19	10	33	31	0	2
Metal Street Light Pole	4	16	10	30	30	0	0
Traffic Signal Pole	0	1	0	1	0	0	1
Pedestrian Crossing Pole				0			
Traffic Control Box				0			
Other	0	2	0	2	1	0	1
Substation Fences	0	0	0	0	0	0	0
Fence				0			
Other				0			
Transmission (Total)	57	2	2	61	60	1	0
Lattice Tower				0			
Pole				0			
Ground	27	1	0	28	28	0	0
Guy	29	1	2	32	32	0	0
Other	1	0	0	1	0	1	0
Miscellaneous Facilities	6	2	0	8	5	0	0
Sidewalk				0			
Gate/Fence/Awning				0			
Control Box				0			
Scaffolding				0			
Bus Shelter				0			
Fire Hydrant				0			
Phone Booth				0			
Water Pipe				0			
Riser	1	0	0	1	1	0	0
Other	5	2	0	7	4	0	0

Appendix 3 Summary of Shock Reports from the Public

NYSEG Data collected as of December 31, 2011	Quarterly Update	Yearly Total
I. Total Shock Calls Received:	3	31
Unsubstantiated		4
Normally Energized Equipment	2	15
Stray Voltage:		
Person	1	12
Animal		
II. Injuries Sustained/Medical Attention Received:	0	11
Person		10
Animal		1
III. Voltage Source:	1	25
Utility Responsibility		
Issue with primary, joint, or transformer		5
Secondary joint (Crab)		
SL service Line		
Abandoned SL service line		
Defective service line		
Abandoned service line		
OH Secondary		1
OH Service		
OH Service neutral		1
Pole		
Riser		
Other		3
Customer Responsibility		
Contractor damage		
Customer equipment/wiring	1	15
Other Utility/Gov't Agency Responsibility		
SL Base Connection		
SL Internal wiring or light fixture		
Overhead equipment		
IV. Voltage Range:	1	12
1.0V to 4.4V		
4.5V to 24.9V		
25V and above		1
No Reading	1	11

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

Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Distribution

Overhead Facilities	2009			2010			2011			2012			2013		
	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
Poles															
Pole Condition															
<i>Number of Deficiencies Repaired in Time Frame</i>	5	82	68	4	140	129	5	360	421						
Repaired - Overdue	1	79	30	1	123	42	4	28	23						
Not Repaired - Not Due	4	3		3	10		1								
Not Repaired - Overdue			38			87		332	398						
					7										
Grounding System															
<i>Number of Deficiencies Repaired in Time Frame</i>	1	5	1	5	29	5	5	19	32						
Repaired - Overdue	1	5	1	4	22	4	5	4	6						
Not Repaired - Not Due				1	7										
Not Repaired - Overdue						1		15	26						
Anchors/Guy Wire															
<i>Number of Deficiencies Repaired in Time Frame</i>	1	24	111	13	54	144	4	128	123						
Repaired - Overdue	1	19	103	11	53	105	3	20	6						
Not Repaired - Not Due		5		2	1		1								
Not Repaired - Overdue			8			39		108	117						
Riser															
<i>Number of Deficiencies Repaired in Time Frame</i>	-	1	-	-	5	3	0	3	0						
Repaired -		1			5										

Overdue Not Repaired - Not Due Not Repaired - Overdue						3		3		
Cross Arm/Bracing <i>Number of Deficiencies</i>	19	116	301	28	163	240	9	313	436	
Repaired in Time Frame	11	106	214	26	161	81	7	37	26	
Repaired - Overdue	8	10		2	2		2			
Not Repaired - Not Due			87			159		276	410	
Not Repaired - Overdue										
Conductors										
Primary Wire/Broken Ties <i>Number of Deficiencies</i>	23	59	24	81	98	31	37	164	85	
Repaired in Time Frame	22	58	11	72	95	10	32	23	2	
Repaired - Overdue	1	1		9	3		5			
Not Repaired - Not Due			13			21		141	83	
Not Repaired - Overdue										
Neutral <i>Number of Deficiencies</i>	1	1	2	6	5	7	1	7	18	
Repaired in Time Frame	1	1	2	6	5		1		1	
Repaired - Overdue										
Not Repaired - Not Due						7		7	17	
Not Repaired - Overdue										
Insulators <i>Number of Deficiencies</i>	5	20	27	11	30	79	4	69	251	
Repaired in Time Frame	3	20	23	11	30	35	4	19	8	
Repaired - Overdue	2									
Not Repaired - Not Due			4			44		50	243	
Not Repaired - Overdue										
Pole Equipment										

Transformers									
<i>Number of Deficiencies</i>	2	11	12	1	20	19	3	8	22
Repaired in Time Frame	1	11	12	1	20	9	2	1	2
Repaired - Overdue	1						1		
Not Repaired - Not Due						10		7	20
Not Repaired - Overdue									
Cutouts									
<i>Number of Deficiencies</i>	-	4	19	2	6	43	0	30	79
Repaired in Time Frame		4	18	2	6	7		4	1
Repaired - Overdue									
Not Repaired - Not Due			1			36		26	78
Not Repaired - Overdue									
Lightning Arrestors									
<i>Number of Deficiencies</i>	-	12	14	1	31	26	0	35	100
Repaired in Time Frame		9	11	1	31	4		5	2
Repaired - Overdue		3							
Not Repaired - Not Due			3			22		30	98
Not Repaired - Overdue									
Skypin/Skypin Bolt									
<i>Number of Deficiencies</i>	-	-	-	-	-	-	0	0	0
Repaired in Time Frame									
Repaired - Overdue									
Not Repaired - Not Due									
Not Repaired - Overdue									
Miscellaneous									
Trimming Related									
<i>Number of Deficiencies</i>	50	390	796	108	74	76	66	1	0
Repaired in Time Frame	45	381	399	92	73	64	51	1	
Repaired - Overdue	5	9		16	1		12		

Not Repaired - Not Due	397			12						
Not Repaired - Overdue							3			
Other										
<i>Number of Deficiencies Repaired in Time Frame</i>	6	16	17	11	16	40	4	22	32	
Repaired - Overdue	3	16	12	11	16	14	3	4	13	
Not Repaired - Not Due	3						1			
Not Repaired - Overdue			5			26		18	19	
Overhead Facilities Total										
Total										
<i>Number of Deficiencies Repaired in Time Frame</i>	113	741	1,392	271	671	842	138	1,159	1,599	
Repaired - Overdue	89	710	836	238	640	375	112	146	90	
Not Repaired - Not Due	24	31	-	33	24	-	23	-	-	
Not Repaired - Overdue	-	-	556	-	-	467	-	1,013	1,509	
	-	-	-	-	7	-	3	-	-	

**Summary of Deficiencies and Repair Activity Resulting from the Inspection Process -
Transmission
NYSEG**

Transmission Facilities	2009			2010			2011			2012			2013			
	Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
	Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
Towers/Poles																
Steel Towers <i>Number of Deficiencies</i>	-	-	-	-	-	10	-	2	-							
Repaired in Time Frame						1										
Repaired - Overdue Not Repaired - Not Due Not Repaired - Overdue						9		2								
Poles <i>Number of Deficiencies</i>	-	-	126	-	41	158	1	14	191							
Repaired in Time Frame			7		26	13	1		1							
Repaired - Overdue Not Repaired - Not Due Not Repaired - Overdue						12										
			119			145		14	190							
						3										
Anchor/Guy Wire <i>Number of Deficiencies</i>	-	1	13	2	26	13	1	2	11							
Repaired in Time		1	1	2	22	4	1									

Frame Repaired - Overdue			4					
Not Repaired - Not Due	12		9	2	11			
Not Repaired - Overdue								
Crossarm/ Brace								
<i>Number of Deficiencies</i>	- 12 59	2 54 87	- 80 75					
Repaired in Time								
Frame	9 11	2 29 26	1					
Repaired - Overdue	3	12						
Not Repaired - Not Due	48	61	79 75					
Not Repaired - Overdue		13						
Grounding System								
<i>Number of Deficiencies</i>	- - 46	45 28 108	2 32 106					
Repaired in Time								
Frame	19	44 18 6	1 21 2					
Repaired - Overdue		1 10	1					
Not Repaired - Not Due	27	102	11 104					
Not Repaired - Overdue								
Conductors								
Cable								
<i>Number of Deficiencies</i>	- 1 -	- 3 -	2 3 -					
Repaired in Time								
Frame	1	1	2					
Repaired - Overdue		2						
Not Repaired -			3					

Not Due Not Repaired - Overdue					
Static/Neutral <i>Number of Deficiencies</i> Repaired in Time Frame Repaired - Overdue Not Repaired - Not Due Not Repaired - Overdue	- 3 1 3 1	- - 1 1	- 1 5 1 5		
Insulators <i>Number of Deficiencies</i> Repaired in Time Frame Repaired - Overdue Not Repaired - Not Due Not Repaired - Overdue	- 9 46 9 3 43	1 8 41 7 5 1 1 36	4 48 63 4 2 46 63		
Miscellaneous					
Right of Way Condition <i>Number of Deficiencies</i> Repaired in Time Frame Repaired - Overdue Not Repaired - Not Due Not Repaired - Overdue	- 3 13 3 5 8	- 23 5 22 1 5	- 1 - 1		
Other					

<i>Number of Deficiencies</i>	2	6	28	43	25	123	6	4	8		
Repaired in Time											
Frame Repaired - Overdue	2	6	2	43	25	19	6				
Not Repaired - Not Due			26			104		4	8		
Not Repaired - Overdue											
Transmission Facilities Total											
Total											
<i>Number of Deficiencies</i>	2	35	332	93	208	546	16	187	459		
Repaired in Time											
Frame Repaired - Overdue	2	32	48	91	150	74	15	24	3		
Not Repaired - Not Due	-	3	-	2	42	-	1	-	-		
Not Repaired - Overdue	-	-	284	-	-	472	-	163	456		
Not Repaired - Overdue	-	-	-	-	16	-	-	-	-		

**Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Underground
NYSEG**

Underground Facilities	2009			2010			2011			2012			2013			
	Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	
Underground Structures																
Damaged Cover																
<i>Number of Deficiencies</i>	5	2	2	22	23	5	4	4	3							
Repaired in Time Frame	1	1	2	22	23	5	4	1	2							
Repaired - Overdue	4	1														
Not Repaired - Not Due								3	1							
Not Repaired - Overdue																
Damaged Structure																
<i>Number of Deficiencies</i>	14	10	7	8	10	3	-	-	-							
Repaired in Time Frame	13	8	7	7	10	2										
Repaired - Overdue	1	2		1												
Not Repaired - Not Due						1										
Not Repaired - Overdue																
Congested Structure																
<i>Number of Deficiencies</i>	4	21	102	-	-	4	-	-	-							
Repaired in Time Frame	4	19	2													
Repaired - Overdue		2														
Not Repaired - Not Due			100			4										
Not Repaired - Overdue																
Damaged Equipment																
<i>Number of Deficiencies</i>	14	25	34	4	6	3	-	-	-							
Repaired in Time Frame	13	24	14	4	6	1										

Repaired - Overdue	1	1						
Not Repaired - Not Due			20		2			
Not Repaired - Overdue								
Conductors								
Primary Cable								
<i>Number of Deficiencies</i>	1	1	1	1	-	-	-	1 -
Repaired in Time Frame	1	1	1	1				
Repaired - Overdue								
Not Repaired - Not Due							1	
Not Repaired - Overdue								
Secondary Cable								
<i>Number of Deficiencies</i>	-	9	9	-	-	-	-	- -
Repaired in Time Frame		9	8					
Repaired - Overdue								
Not Repaired - Not Due			1					
Not Repaired - Overdue								
Neutral Cable								
<i>Number of Deficiencies</i>	-	-	-	-	-	-	-	- -
Repaired in Time Frame								
Repaired - Overdue								
Not Repaired - Not Due								
Not Repaired - Overdue								
Racking Needed								
<i>Number of Deficiencies</i>	3	4	1	-	-	-	-	- -
Repaired in Time Frame		1	1					
Repaired - Overdue	3	3						
Not Repaired - Not Due								
Not Repaired - Overdue								

Miscellaneous										
Other										
<i>Number of Deficiencies Repaired in Time Frame</i>	32	79	203	8	12	19	-	2	1	
Repaired - Overdue	26	74	148	8	12	14			1	
Not Repaired - Not Due	6	5								
Not Repaired - Overdue			55		5			2		
Underground Facilities Total										
Total										
<i>Number of Deficiencies Repaired in Time Frame</i>	73	151	359	43	51	34	4	7	4	
Repaired - Overdue	58	137	183	42	51	22	4	1	3	
Not Repaired - Not Due	15	14	-	1	-	-	-	-	-	
Not Repaired - Overdue	-	-	176	-	-	12	-	6	1	
	-	-	-	-	-	-	-	-	-	

Repaired - Overdue									
Oil Leak <i>Number of Deficiencies</i>	-	-	-	9	25	8	2	8	-
Repaired in Time Frame				8	22	4	2		
Repaired - Overdue				1	2				
Not Repaired - Not Due						4		8	
Not Repaired - Overdue					1				
Off Pad <i>Number of Deficiencies</i>	-	-	-	13	20	8	7	14	1
Repaired in Time Frame				11	18	8	7	3	
Repaired - Overdue				2	1				
Not Repaired - Not Due								11	1
Not Repaired - Overdue					1				
Lock/Latch/Penta <i>Number of Deficiencies</i>	-	-	14	11	22	17	3	7	3
Repaired in Time Frame			3	11	21	13	3		1
Repaired - Overdue					1				
Not Repaired - Not Due			11			4		7	2
Not Repaired - Overdue									
Miscellaneous									
Other <i>Number of Deficiencies</i>	-	3	5	13	60	138	1	9	86
Repaired in Time Frame			4	13	59	132	1	2	74
Repaired - Overdue			3		1				
Not Repaired - Not Due			1			6		7	12
Not Repaired - Overdue									

Repaired - Overdue									
Pad Mount Total									
Total									
<i>Number of Deficiencies</i>	-	4	68	56	163	190	18	78	100
Repaired in Time Frame	-	-	32	51	150	171	17	8	75
Repaired - Overdue	-	4	-	5	10	-	-	-	-
Not Repaired - Not Due	-	-	36	-	-	19	-	70	25
Not Repaired - Overdue	-	-	-	-	3	-	1	-	-

**Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Streetlights
NYSEG**

Overhead Facilities	2009			2010			2011			2012			2013			
	Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 3 years
Streetlight																
Base/Standard/Light Number of Deficiencies Repaired in Time Frame Repaired - Overdue Not Repaired - Not Due Not Repaired - Overdue	-	2	1	2	51	1	-	-	1							
		2	1	2	51	1			1							
Handhole/Service Box Number of Deficiencies Repaired in Time Frame Repaired - Overdue Not Repaired - Not Due Not Repaired - Overdue	-	-	-	-	-	-	-	-	-	-						
Service/Internal Wiring Number of Deficiencies Repaired in Time Frame Repaired - Overdue Not Repaired - Not Due Not Repaired - Overdue	-	-	-	-	9	-	-	-	-							
				9												
Access Cover																

Number of Deficiencies Repaired in Time Frame	3	-	-	4	39	-	-	-	-		
Repaired - Overdue	3			4	39						
Not Repaired - Not Due											
Not Repaired - Overdue											
Miscellaneous											
Other											
Number of Deficiencies Repaired in Time Frame	-	1	53	-	3	-	-	1	-		
Repaired - Overdue		1	51		3						
Not Repaired - Not Due											
Not Repaired - Overdue			2					1			
Streetlight Total											
Total											
Number of Deficiencies Repaired in Time Frame	3	3	54	6	102	1	-	1	1		
Repaired - Overdue	3	3	52	6	102	1	-	-	1		
Not Repaired - Not Due	-	-	-	-	-	-	-	-	-		
Not Repaired - Overdue	-	-	2	-	-	-	-	1	-		
	-	-	-	-	-	-	-	-	-		

Right of Way Condition	4	3	64	1	54	15		
Other	10		263	6	249	1		
Transmission Facilities Total	205	8	683	14	410	20		
Underground Facilities								
Underground Structures								
Damaged Cover	3	2	5	3				
Damaged Structure	3	2	1	1				
Congested Structure	5	5						
Damaged Equipment	2	1						
Conductors								
Primary Cable			2	1				
Secondary Cable	1	1						
Neutral Cable Racking Needed								
Miscellaneous								
Other	56	44	107	83				
Underground Facilities Total	70	55	115	88	0	0		
Pad Mount Transformers								
Pad Mount Structures								
Damaged Structure	9	5	6	3	2			
Damaged Equipment			3	1	2	2		
Damaged Cable					3	2		
Oil Leak Off Pad			3	2	2			
Lock/Latch/Penta			2	2	2			
Miscellaneous								
Other	5	2	512	374	149	138		
Pad Mount Transformer Total	14	7	558	409	161	142		
Streetlights								
Streetlight								
Base/Standard/Light			13					
Handhole/Service Box								
Service/Internal								

Wiring							
Access Cover			9	2			
Miscellaneous							
Other			11				
Streetlight Total	0	0	33	2	0	0	
Total Level IV Conditions							
Overall Total	543	160	3,780	1,073	4,210	615	

**NYSEG Visual Inspection Program
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process Ending December 31,2011**

Year	Priority Level / Repair Expected	Deficiencies Found (Total)	Repaired In Time Frame	Repaired - Overdue	Not Repaired - Not Due	Not Repaired - Overdue
2009	I Within 1 week	191	152	39	0	0
	II Within 1 year	934	882	52	0	0
	III Within 3 years	2,205	1,151	0	1,054	0
	IV N/A	543	160	n/a	383	n/a
2010	I Within 1 week	469	428	41	0	0
	II Within 1 year	1,195	1093	76	0	26
	III Within 3 years	1,613	643	0	970	0
	IV N/A	3,780	1,073	n/a	2,707	n/a
2011	I Within 1 week	176	148	24	0	4
	II Within 1 year	1,432	179	0	1,253	0
	III Within 3 years	2,163	172	0	1,991	0
	IV N/A	4,210	615	n/a	3,595	n/a
2012	I Within 1 week					
	II Within 1 year					
	III Within 3 years					
	IV N/A					
2013	I Within 1 week					
	II Within 1 year					
	III Within 3 years					
	IV N/A					

Appendix 5 Temporary Repair Exceptions

For 2011, NYSEG has no temporary repair exceptions to report

Appendix 6 Summary of Overdue Repairs

NYSEG Summary of Overdue Repairs for Level II Repairs

Year	Facilities	-- Repaired -- Number of Days Overdue				-- Not Repaired -- Number of Days Overdue				Comments
		1-30	31-90	91-180	>180	1-30	31-90	91-180	>180	
2009	Distribution	21	6	3	1	-	-	-	-	
	Transmission	-	-	-	3	-	-	-	-	
	Underground	6	8	-	-	-	-	-	-	
	Pad-mounts	-	-	2	2	-	-	-	-	
	Streetlights	-	-	-	-	-	-	-	-	
2010	Distribution	22	-	-	2	-	-	-	7	Poles are inaccessible and require special equipment to access
	Transmission	7	30	4	1	2	13	-	1	Repairs delayed due to back-ordered materials and special equipment needed to access the poles
	Underground	-	-	-	-	-	-	-	-	
	Pad-mounts	1	8	1	-	-	1	2	-	Require outages- scheduled for 1Qtr 2012
	Streetlights	-	-	-	-	-	-	-	-	
2011	Distribution	-	-	-	-	-	-	-	-	
	Transmission	-	-	-	-	-	-	-	-	
	Underground	-	-	-	-	-	-	-	-	
	Pad-mounts	-	-	-	-	-	-	-	-	
	Streetlights	-	-	-	-	-	-	-	-	
2012	Distribution									
	Transmission									
	Underground									
	Pad-mounts									
	Streetlights									
2013	Distribution									
	Transmission									
	Underground									
	Pad-mounts									
	Streetlights									

Exhibit 1

CERTIFICATION
[STRAY VOLTAGE TESTING]

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

Mary Smith on this 14 day of February 2012 certifies as follows:

1. I am the Vice President, Asset Management and Planning for New York State Electric & Gas (the “Company”), and in that capacity I make this Certification for the annual period ending December 31st, 2011 based on my knowledge of the testing program adopted by the Company in accordance the Public Service Commission’s Orders issued and effective January 5, July 21, 2005, and December 15, 2008 in Case 04-M-0159 and July 21, 2010 in Case 10-E-0271 (collectively the “Orders”), including the Quality Assurance Program filed by the Company with the Commission.

2. In accordance with the requirements of the Orders, the Company developed a program designed to test (i) all of the publicly accessible electric facilities owned by the Company (“Facilities”) and (ii) all streetlights located in public thoroughfares in the Company’s service territory (“Streetlights”), as identified through a good faith effort by

the Company, for stray voltage (the “Stray Voltage Testing Program”).

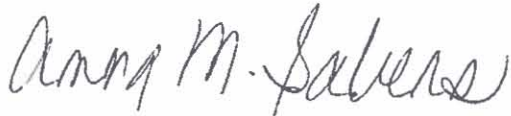
3. I am responsible for overseeing the Company’s Stray Voltage Testing Program and in that capacity I have monitored the Company’s Stray Voltage Testing Program during the twelve months ended December 31st, 2011 (the “Twelve-Month Period”).
4. I hereby certify that, to the best of my knowledge, information 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 temporarily inaccessible in the Company’s Annual Report, submitted herewith, the Company is unaware of any Facilities or Streetlights that were not tested during the Twelve-Month Period.
5. I make this certification subject to the condition and acknowledgment 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 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

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



Sworn to before me this 14 day of February, 2012

Notary Public:



ANNA M. SABERS
Notary Public, State of New York
No. 01SA6072590
Qualified in Monroe County
Commission Expires April 06, 2014

Exhibit 1
CERTIFICATION
[FACILITY INSPECTIONS]

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

Gene M. Jensen, on this 15th day of February 2012, certifies as follows:

1. I am the Vice President, Electric Operations for New York State Electric & Gas (the “Company”), and in that capacity I make this Certification for the annual period ending December 31st, 2011 based on my knowledge of the inspection program adopted by the Company in accordance the Public Service Commission’s Orders issued and effective January 5, July 21, 2005, and December 15, 2008 in Case 04-M-0159 and July 21, 2010 in Case 10-E-0271 (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 and in that capacity I have monitored the

program during the twelve months ended December 31st,
2011 (the "Twelve-Month Period").

4. 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
2011, in order to comply with the five-year inspection cycle
required under the Orders.

Gene M. Jensen

Sworn to before me this 15th day of February, 2012

Notary Public: *Roberta B. Holahan*

ROBERTA B. HOLAHAN
Notary Public, State of New York
No. 01HO6040322
Qualified in Monroe County
Commission Expires April 17, 2014