

BEFORE THE
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

In the Matter of

National Fuel Gas Distribution Corporation New York Division

Case 16-G-0257

August 2016

Pre-Filed Exhibits of Staff
Gas Safety Panel

Christopher Stolicky
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Index of Gas Safety Panel (GSP) Exhibits

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Relied Upon Responses to Information Requests

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NATIONAL FUEL GAS DISTRIBUTION CORPORATION
NEW YORK DIVISION
RESPONSE TO DEPARTMENT OF PUBLIC SERVICE
REQUEST FOR INFORMATION
CASE 16-G-0257

Question

Leak Prone Pipe (LPP) Replacement

- 1) Provide the total mileage of leak prone pipe (LPP) remaining, per material type, in each of the operating service territories at the end of the 2015 calendar year.
- 2) Provide the total mileage of LPP replaced, per material type, in each of the operating service territories during the following calendar years: 2011, 2012, 2013, 2014, and 2015.
- 3) On page 3, lines 8 and 9, of the Direct Testimony of Kevin D. House, certain earlier vintages of plastic piping are included within the Company's leak prone pipe replacement program. Provide the specific earlier vintages of plastic piping included in the Company's leak prone pipe replacement program.
- 4) On page 4, lines 3 through 7, of the Direct Testimony of Kevin D. House, the Pipeline Replacement Evaluation Program, PREP, is discussed as a robust and carefully designed program which prioritizes the segments of leak prone pipe to be replaced. Describe the process and methodology utilized by PREP and the Company, to prioritize segments of leak prone pipe for their replacement.

Response

- 1) See table below.

<i>LPP MILES</i>	<i>MSW</i>	<i>TOSC</i>	<i>BASC</i>	<i>CLSC</i>	<i>OPSC</i>	<i>DUSC</i>	<i>SALD</i>	<i>WELD</i>	<i>JAMD</i>	<i>NFSC</i>	<i>Total</i>
<i>Cast Iron</i>	63.14	18.36	0.00	0.05	0.00	0.00	0.00	0.01	0.00	0.01	81.57
<i>Coated Unprotected</i>	2.58	0.43	0.09	0.29	0.69	0.45	0.24	0.28	1.44	1.26	7.74
<i>Bare Protected</i>	0.95	3.75	23.44	0.00	30.82	24.39	0.00	16.87	3.90	5.48	109.60
<i>Bare Unprotected</i>	272.25	131.44	90.83	133.42	297.82	249.06	77.39	123.08	101.87	79.56	1,556.72
<i>Wrought Iron</i>	101.65	27.81	0.00	7.23	23.58	1.73	8.11	45.71	11.11	0.00	226.93
<i>Total</i>	440.56	181.79	114.36	140.98	352.92	275.63	85.73	185.96	118.32	86.31	1,982.55

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2) See tables below.

<i>CY2011 (Miles)</i>	<i>MSW</i>	<i>TOSC</i>	<i>BASC</i>	<i>CLSC</i>	<i>OPSC</i>	<i>DUSC</i>	<i>SALD</i>	<i>WELD</i>	<i>JAMD</i>	<i>NFSC</i>	<i>Total</i>
<i>Cast Iron</i>	2.36	3.54	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.04	5.95
<i>Coated Unprotected</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>Bare Protected</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>Bare Unprotected</i>	6.60	8.15	2.74	8.81	20.01	12.77	1.21	2.41	2.99	4.50	70.18
<i>Wrought Iron</i>	0.65	0.96	0.00	0.00	1.38	0.00	0.00	1.41	0.00	0.00	4.41
<i>Leak-prone Plastic</i>	0.04	0.00	0.00	0.00	0.00	1.79	0.00	0.00	0.00	0.00	1.83
Total	9.65	12.65	2.74	8.81	21.39	14.56	1.21	3.82	2.99	4.54	82.36

<i>CY2012 (Miles)</i>	<i>MSW</i>	<i>TOSC</i>	<i>BASC</i>	<i>CLSC</i>	<i>OPSC</i>	<i>DUSC</i>	<i>SALD</i>	<i>WELD</i>	<i>JAMD</i>	<i>NFSC</i>	<i>Total</i>
<i>Cast Iron</i>	7.00	4.92	0.00	0.00	0.00	0.05	0.00	0.00	0.00	0.00	11.97
<i>Coated Unprotected</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>Bare Protected</i>	0.00	0.00	0.00	0.00	0.28	0.00	0.00	0.00	0.02	0.00	0.30
<i>Bare Unprotected</i>	8.95	4.17	3.36	4.03	11.71	12.56	2.14	4.93	4.67	3.49	60.02
<i>Wrought Iron</i>	0.64	0.85	0.00	0.00	1.35	0.00	0.00	2.91	0.00	0.00	5.74
<i>Leak-prone Plastic</i>	1.20	0.29	0.22	0.00	1.54	0.43	0.00	0.08	0.00	0.00	3.76
Total	17.79	10.23	3.58	4.03	14.88	13.04	2.14	7.92	4.69	3.49	81.79

<i>CY2013 (Miles)</i>	<i>MSW</i>	<i>TOSC</i>	<i>BASC</i>	<i>CLSC</i>	<i>OPSC</i>	<i>DUSC</i>	<i>SALD</i>	<i>WELD</i>	<i>JAMD</i>	<i>NFSC</i>	<i>Total</i>
<i>Cast Iron</i>	5.35	4.80	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0.07	10.51
<i>Coated Unprotected</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>Bare Protected</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>Bare Unprotected</i>	6.96	4.35	6.27	4.66	19.60	12.33	2.12	2.08	4.03	2.51	64.91
<i>Wrought Iron</i>	1.00	0.44	0.00	0.10	1.83	0.00	0.30	0.36	0.00	0.00	4.03
<i>Leak-prone Plastic</i>	0.00	0.00	1.31	0.00	0.00	0.16	0.00	0.00	0.00	0.00	1.47
Total	13.30	9.59	7.58	4.76	21.43	12.49	2.41	2.74	4.03	2.58	80.92

<i>CY2014 (Miles)</i>	<i>MSW</i>	<i>TOSC</i>	<i>BASC</i>	<i>CLSC</i>	<i>OPSC</i>	<i>DUSC</i>	<i>SALD</i>	<i>WELD</i>	<i>JAMD</i>	<i>NFSC</i>	<i>Total</i>
<i>Cast Iron</i>	7.07	3.89	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	10.98
<i>Coated Unprotected</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>Bare Protected</i>	0.00	0.00	0.00	0.00	0.00	0.04	0.00	0.88	0.00	0.61	1.53
<i>Bare Unprotected</i>	11.65	8.11	5.58	4.13	18.13	17.17	2.43	4.26	5.08	3.63	80.19
<i>Wrought Iron</i>	1.09	0.85	0.00	0.00	0.37	0.00	0.03	0.20	0.00	0.00	2.54
<i>Leak-prone Plastic</i>	0.00	0.01	0.01	0.07	0.02	0.00	0.00	0.36	0.00	0.32	0.81
Total	19.82	12.87	5.60	4.20	18.52	17.21	2.46	5.71	5.08	4.58	96.04

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<i>CY2015 (Miles)</i>	<i>MSW</i>	<i>TOSC</i>	<i>BASC</i>	<i>CLSC</i>	<i>OPSC</i>	<i>DUSC</i>	<i>SALD</i>	<i>WELD</i>	<i>JAMD</i>	<i>NFSC</i>	<i>Total</i>
<i>Cast Iron</i>	6.53	3.87	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.01	10.41
<i>Coated Unprotected</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>Bare Protected</i>	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>Bare Unprotected</i>	18.06	6.47	3.72	2.78	12.40	19.82	3.38	4.95	6.61	2.53	80.72
<i>Wrought Iron</i>	1.98	2.21	0.00	0.05	0.06	0.06	0.00	0.79	0.00	0.00	5.14
<i>Leak-prone Plastic</i>	0.01	0.00	0.00	0.57	0.10	0.40	0.00	0.00	0.00	0.00	1.09
<i>Total</i>	26.58	12.55	3.72	3.40	12.56	20.27	3.38	5.74	6.61	2.54	97.35

3) The Company includes plastic pipe replacements on earlier vintage plastic pipe where rock impingement leaks, and/or visually questionable or leaking fusions have been discovered through the Company's Plastic System Failure Analysis and Remediation Program. Pipeline replacement projects identified under this program are designated with a 415P Activity and included in the Company's annual leak prone pipe replacement totals.

4) See response to UFR-84 (C-E)

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Question

Leak Management

- 1) Provide the total number of Type 1, 2A, 2, and 3 leaks on the system which were backlogged on December 31 of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 2) Provide the total number of Type 1, 2A, 2, and 3 leaks on leak prone pipe which were backlogged on December 31 of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 3) Provide the total number of discovered Type 1, 2A, 2, and 3 leaks on the system during each of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 4) Provide the total number of discovered Type 1, 2A, 2, and 3 leaks on leak prone pipe during each of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 5) Provide the total number of Type 1, 2A, 2, and 3 leaks which were eliminated via various replacement programs on the system during each of the 2011, 2012, 2013, 2014, and 2015.
- 6) Provide the total number of Type 1, 2A, 2, and 3 leaks which were eliminated via various replacement programs on leak prone pipe during each of the following calendar years: 2011, 2012, 2013, 2014, and 2015 calendar years.
- 7) Provide the total number of Type 1, 2A, 2, and 3 leaks repaired by means other than replacement programs on the system during each of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 8) Provide the total number of Type 1, 2A, 2, and 3 leaks repaired by means other than replacement programs on leak prone pipe during each of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 9) A) Describe the current process or procedure utilized to review, identify, and consolidate any duplicate leak records within the system.
B) Provide the total number of Type 1, 2A, 2, and 3 leaks consolidated by the process in question 9-A above during each of the 2011, 2012, 2013, 2014, and 2015 calendar years.

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10) Provide any limitations the Company would experience should these leak backlog targets be further increased.

11) Has the Company ever attempted to quantify the amount of methane leaking from a Type 3 leak? If so, provide a description of the technology used and any results obtained.

12) Does the Company have any identification of Type 3 leaks that release more methane than others? Or, has the Company attempted to list Type 3 leaks in this manner?

Response

- 1-8) See attached. Please note that for the tables in response to questions 1 through 8, that leak prone pipe includes bare steel, cast iron and wrought iron pipe and leaks reissued after repair have been excluded. For the Leak Backlog and Discovered Leaks summaries the columns labeled "Still Open" have not been repaired yet and therefore the leaking material is unknown and therefore the leaks cannot be designated as being on leak prone or non-leak prone pipe.
- 9A) Duplicate leaks can occur when a leak report is issued during a leak investigation, or leak survey, for a previously reported leak. These duplicate leaks are generally identified during the leak reinvestigation process and the newest record is deleted. The Company retains records on deleted leaks but does not include deleted leaks in its reporting to DPS Staff. The Company also updates previous quarterly leak data each quarter, within a given year, by removing newly deleted leaks from previously reported totals. Duplicate leaks can also occur after leak repair when additional leakage is discovered upon recheck and a new leak report is issued. Beginning in 2016 with new Performance Measure reporting guidelines, the Company is no longer including these duplicate leaks in its reporting to NYDPS Staff. To eliminate these duplicates from reporting, the Company records the original leak order number on new leak orders issued when rechecking the original leak repair. For reporting purposes the Company counts the original leak report but does not count the original leak repair. Likewise the Company does not count the reissued leak report but does count the reissued leak repair. The Company will update previous quarter repair data, for leaks

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pending recheck at the end of a quarter, where a new leak is issued upon recheck.

9B) None. The Company did not consolidate duplicate leaks discovered upon recheck prior to 2016 as we viewed these leaks as new leaks since repairs were made to the original leaks.

10) The Company would anticipate additional O&M costs to reduce year-end leak backlogs beyond current levels. Depending on the level of reduction, pipeline replacement costs may also be impacted as Company construction crews are diverted from replacing leak prone pipe to repairing leaks, increasing reliance on a limited pool of qualified pipeline contractors to achieve leak prone pipe replacement targets.

11) No

12) No

2011-2015 Leak Backlog Summary															
Leak Type	2011			2012			2013			2014			2015		
	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open
1	2	2	0	2	2	0	2	2	0	0	0	0	0	0	0
2A	16	15	0	4	3	0	11	11	0	0	0	0	0	0	0
2	45	43	0	52	45	0	44	39	0	1	1	0	0	0	0
3	3,336	2,480	672	3,095	2,118	831	2,854	1,757	975	2,573	1,266	1,191	1,938	386	1,512
Total	3,399	2,540	672	3,153	2,168	831	2,911	1,809	975	2,574	1,267	1,191	1,938	386	1,512

2011-2015 Discovered Leaks Summary															
Leak Type	2011			2012			2013			2014			2015		
	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open
1	953	574	0	1074	663	0	1048	614	0	1293	868	0	1213	827	0
2A	204	170	0	281	253	0	245	209	0	290	240	0	472	412	0
2	677	595	0	900	786	0	706	577	0	590	460	0	707	573	0
3	1,725	1,382	133	1,881	1,505	154	1,472	1,129	142	1,172	791	207	1,361	847	314
Total	3,559	2,721	133	4,136	3,207	154	3,471	2,529	142	3,345	2,359	207	3,753	2,659	314

2011-2015 Leak Repair Summary																				
Leak Type	2011				2012				2013				2014				2015			
	Replacement Program Total	Replacement Program Leak Prone Pipe	Other than Replacement Program - Total	Other than Replacement Program - Leak Prone Pipe	Replacement Program Total	Replacement Program Leak Prone Pipe	Other than Replacement Program - Total	Other than Replacement Program - Leak Prone Pipe	Replacement Program Total	Replacement Program Leak Prone Pipe	Other than Replacement Program - Total	Other than Replacement Program - Leak Prone Pipe	Replacement Program Total	Replacement Program Leak Prone Pipe	Other than Replacement Program - Total	Other than Replacement Program - Leak Prone Pipe	Replacement Program Total	Replacement Program Leak Prone Pipe	Other than Replacement Program - Total	Other than Replacement Program - Leak Prone Pipe
1	302	250	630	304	383	334	674	315	362	303	672	300	430	379	843	472	388	341	809	467
2A	38	34	152	123	75	72	193	123	72	70	159	123	71	61	222	123	135	122	329	123
2	195	179	450	389	228	210	620	335	127	112	536	335	157	143	460	335	158	134	544	335
3	425	403	994	869	521	469	1,656	869	471	446	1,289	869	374	354	1,112	869	429	381	1,594	869
Total	960	866	2,226	1,685	1,207	1,085	3,143	1,642	1,032	931	2,656	1,627	1,032	937	2,637	1,799	1,110	978	3,276	1,794

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Question

Leak Management

- 1) Provide the total number of Type 1, 2A, 2, and 3 leaks on the system which were backlogged on December 31 of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 2) Provide the total number of Type 1, 2A, 2, and 3 leaks on leak prone pipe which were backlogged on December 31 of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 3) Provide the total number of discovered Type 1, 2A, 2, and 3 leaks on the system during each of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 4) Provide the total number of discovered Type 1, 2A, 2, and 3 leaks on leak prone pipe during each of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 5) Provide the total number of Type 1, 2A, 2, and 3 leaks which were eliminated via various replacement programs on the system during each of the 2011, 2012, 2013, 2014, and 2015.
- 6) Provide the total number of Type 1, 2A, 2, and 3 leaks which were eliminated via various replacement programs on leak prone pipe during each of the following calendar years: 2011, 2012, 2013, 2014, and 2015 calendar years.
- 7) Provide the total number of Type 1, 2A, 2, and 3 leaks repaired by means other than replacement programs on the system during each of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 8) Provide the total number of Type 1, 2A, 2, and 3 leaks repaired by means other than replacement programs on leak prone pipe during each of the 2011, 2012, 2013, 2014, and 2015 calendar years.
- 9) A) Describe the current process or procedure utilized to review, identify, and consolidate any duplicate leak records within the system.

B) Provide the total number of Type 1, 2A, 2, and 3 leaks consolidated by the process in question 9-A above during each of the 2011, 2012, 2013, 2014, and 2015 calendar years.

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10) Provide any limitations the Company would experience should these leak backlog targets be further increased.

11) Has the Company ever attempted to quantify the amount of methane leaking from a Type 3 leak? If so, provide a description of the technology used and any results obtained.

12) Does the Company have any identification of Type 3 leaks that release more methane than others? Or, has the Company attempted to list Type 3 leaks in this manner?

Response

1-8) See attached. Please note that for the tables in response to questions 1 through 8, that leak prone pipe includes bare steel, cast iron and wrought iron pipe. Deleted leaks and leaks reissued after repair have been excluded. For the Leak Backlog and Discovered Leaks summaries the columns labeled "Still Open" include leaks that have not been repaired yet and therefore the leaking material is unknown and cannot be designated as being on leak prone or non-leak prone pipe. Please note that leak totals in this response may be different than data previously submitted to Staff in Annual Performance Measure reports primarily due to duplicate leaks that were deleted after Performance Measure Reports were submitted and due to the consolidation of leaks reissued after recheck. See the response to Question 9A below for additional information.

9A) Duplicate leaks can occur when a leak report is issued during a leak investigation, or leak survey, for a previously reported leak. These duplicate leaks are generally identified during the leak reinvestigation process and the newest record is deleted. The Company retains records on deleted leaks but does not include deleted leaks in its reporting to DPS Staff. The Company also updates previous quarterly leak data each quarter, within a given year, by removing newly deleted leaks from previously reported totals. Duplicate leaks can also occur after leak repair when additional leakage is discovered upon recheck and a new leak report is issued. Beginning in 2016 with new Performance Measure reporting guidelines, the Company is consolidating these duplicate leaks in its reporting to NYDPS Staff. To eliminate these duplicates from reporting, the Company records the reissued leak order number on the original leak order, if leakage is

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discovered when rechecking the original leak repair. For reporting purposes the Company counts the original leak report but does not count the original leak repair. Likewise the Company does not count the reissued leak report but does count the reissued leak repair. Going forward, the Company will update previous quarter repair data, for leaks pending recheck at the end of a quarter, where a new leak is issued upon recheck.

- 9B) See attached for the Company's assessment of the number of leaks consolidated in reporting in response to Questions 1-8.
- 10) The Company would anticipate additional O&M costs to reduce year-end leak backlogs beyond current levels. Depending on the level of reduction, pipeline replacement costs may also be impacted as Company construction crews are diverted from replacing leak prone pipe to repairing leaks, increasing reliance on a limited pool of qualified pipeline contractors to achieve leak prone pipe replacement targets.
- 11) No
- 12) No

2011-2015 Leak Backlog Summary															
Leak Type	2011			2012			2013			2014			2015		
	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open
1	1	1	0	2	2	0	2	2	0	0	0	0	0	0	0
2A	15	14	0	6	5	0	12	12	0	0	0	0	0	0	0
2	47	45	0	53	46	0	55	50	0	2	2	0	2	1	0
3	3,335	2,484	666	3,092	2,121	824	2,841	1,751	967	2,571	1,275	1,179	1,935	402	1,493
Total	3,398	2,544	666	3,153	2,174	824	2,910	1,815	967	2,573	1,277	1,179	1,937	403	1,493

2011-2015 Discovered Leaks Summary															
Leak Type	2011			2012			2013			2014			2015		
	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open	Total	Leak Prone Pipe	Still Open
1	954	575	0	1077	664	0	1054	618	0	1295	870	0	1215	827	0
2A	204	170	0	283	255	0	247	211	0	290	240	0	472	412	0
2	678	596	0	902	788	0	709	580	0	592	461	0	708	574	0
3	1,726	1,384	132	1,883	1,508	153	1,471	1,129	141	1,172	794	204	1,361	852	309
Total	3,562	2,725	132	4,145	3,215	153	3,481	2,538	141	3,349	2,365	204	3,756	2,665	309

2011-2015 Leak Repair Summary																				
Leak Type	2011				2012				2013				2014				2015			
	Replacement Program Total	Replacement Program Leak Prone Pipe	Other than Replacement Program - Total	Other than Replacement Program - Leak Prone Pipe	Replacement Program Total	Replacement Program Leak Prone Pipe	Other than Replacement Program - Total	Other than Replacement Program - Leak Prone Pipe	Replacement Program Total	Replacement Program Leak Prone Pipe	Other than Replacement Program - Total	Other than Replacement Program - Leak Prone Pipe	Replacement Program Total	Replacement Program Leak Prone Pipe	Other than Replacement Program - Total	Other than Replacement Program - Leak Prone Pipe	Replacement Program Total	Replacement Program Leak Prone Pipe	Other than Replacement Program - Total	Other than Replacement Program - Leak Prone Pipe
1	302	250	631	305	384	335	676	315	362	303	678	304	431	380	844	473	388	341	811	467
2A	38	34	152	123	75	72	195	170	72	70	160	125	71	61	222	181	135	122	329	282
2	195	179	452	390	229	211	621	530	127	112	539	424	159	144	460	341	158	134	545	437
3	427	405	997	853	522	470	1,656	1,447	472	447	1,291	1,089	374	354	1,113	952	429	381	1,594	1,365
Total	962	868	2,232	1,671	1,210	1,088	3,148	2,462	1,033	932	2,668	1,942	1,035	939	2,639	1,947	1,110	978	3,279	2,551

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Question

Gas Accounts without a Customer of Record, or Soft-Offs

- 1) Provide the total number of accounts in which gas is being supplied without having a customer of record.
- 2) For each of the accounts identified in question 1 above, provide the time elapsed since the company identified these premises without a customer of record to the time the gas meters were locked (if any). If meters at these premises were not locked, please explain why not?
- 3) For each of the accounts identified in question 1 above, provide the number of accounts that had meter readings since the last known customer of record and the number of accounts that have not had a meter reading since the last known customer of record.
- 4) For each of the accounts identified in question 1 above, how many of these accounts are equipped with automatic meter reading systems?
- 5) For each of the accounts identified in question 1 above, how many of these accounts are registering gas consumption, although the premises are unoccupied?
- 6) For each of the accounts identified in question 1 above, what are the total consumptions and associated dollar amounts booked?
- 7) Explain the accounting treatment and/or booking method for cost recovery and associated usage with gas consumed by meters in "soft-off" status (e.g. recorded under "lost and unaccounted for" gas consumption, uncollectible, or some other category).
- 8) How many inside meters without a customer of record have not been accessible: (a) for less than 30 days; (b) for more than three months but less than or equal to six months; (c) for more than six months but less than or equal to 12 months; and (d) more than one year?

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9) For those meters that are located inside a premise, provide the number of attempts the Company has made to gain access. Explain what action(s) has the Company taken to date to improve access to inside meters.

10) For the meters that have shown gas usage and have not been accessible for more than one year, how did the Company determine the amount assigned to this type of gas usage (as opposed to what the company assigns to leaks or theft of service estimates)?

Response

The Commission is aware that utilities across New York State have long utilized soft locks or temporary accounts in the provision of residential utility service. They are especially helpful to avoid a tragedy where a customer plans on moving out but something delays or prevents them from doing so, and in situations when service is likely to be requested in a short time by a new party. Significant utility expense can also be avoided by continuing the service during these short time periods. While utilities have used these accounts for reasonable time periods in the operation of their businesses, the practice has recently been called into question by the Commission and, as a result, the Company is now reviewing its practices.

Presently, there are two situations in which the Company knowingly provides gas service to residential addresses for a brief time period in the absence of a customer of record. The first situation involves severe weather. Here, the Company will not lock service to a residential account where the customer of record has requested discontinuance of service and where the premise appears to remain occupied. The severe weather program is designed to avoid risk of injury or death that could occur due to absence of heat. The Company will reschedule the lock order and shut off service after the severe weather subsides. The second situation involves outside meter sets where the Company will briefly provide continued residential gas service without a customer of record through a Temporary Account as the vast number of premises will have service established for a new customer within a short time period. This practice eliminates the significant expense of having a Company crew visit to lock an outside meter set only to return few days later to turn service back on. If the Company does not receive an application for service at that address after a brief

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time period, the Company issues an order to physically lock the accessible meter.

The Company has switched to a new billing and order system in May 2016. The following responses are provided based on queries in the new system.

- 1) As of June 21, 2016 , there are a total of 21 active Temporary Accounts for May 2016.
- 2) All of the Temporary Accounts identified in Question 1 have been active less than 45 days. There has been a slight delay in locking these meters due to the recent implementation of the new system. The Company is diligently attempting to lock these accounts at present.
- 3) 13 of Temporary Accounts identified in Question 1 have had a meter reading since the prior customer of record, while 8 have not.
- 4) None.
- 5) 11 of the Temporary Accounts identified in Question 1 are known to have had consumption since creation, although the Company makes no statement concerning whether or not such premises are unoccupied.
- 6) Total consumption on the Temporary Accounts verified by Company readings is 222 ccf. The dollar amounts associated with these 13 Temporary Accounts is \$380.40
- 7) The Company initially accounts for the gas consumption associated with Temporary Account status as a customer account receivable within the customer information system. Since this is gas consumption used by the Company, the customer account receivable balance is reduced and an operation expense account is charged.
- 8) None. The Company does not create Temporary Accounts where the meter sets are inside.
- 9) Not applicable.

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10) Not applicable.

HIGH RISK SECTIONS PART 255		
ACTIVITY TITLE	CODE SECTION	RISK FACTOR
Material - General	255.53(a),(b),(c)	HIGH
Transportation of Pipe	255.65	HIGH
Pipe Design - General	255.103	HIGH
Design of Components - General Requirements	255.143	HIGH
Design of Components - Flexibility	255.159	HIGH
Design of Components - Supports and anchors	255.161	HIGH
Compressor Stations: Emergency shutdown	255.167	HIGH
Compressor Stations: Pressure limiting devices	255.169	HIGH
Compressor Stations: Ventilation	255.173	HIGH
Valves on pipelines to operate at 125 psig or more	255.179	HIGH
Distribution line valves	255.181	HIGH
Vaults: Structural Design requirements	255.183	HIGH
Vaults: Drainage and waterproofing	255.189	HIGH
Protection against accidental overpressuring	255.195	HIGH
Control of the pressure of gas delivered from high pressure distribution systems	255.197	HIGH
Requirements for design of pressure relief and limiting devices	255.199	HIGH
Required capacity of pressure relieving and limiting stations	255.201	HIGH
Qualification of welding procedures	255.225	HIGH
Qualification of Welders	255.227	HIGH
Protection from weather	255.231	HIGH
Miter Joints	255.233	HIGH
Preparation for welding	255.235	HIGH
Inspection and test of welds	255.241(a),(b)	HIGH
Nondestructive testing-Pipeline to operate at 125 PSIG or more	255.243(a)-(e)	HIGH
Welding inspector	255.244(a),(b),(c)	HIGH
Repair or removal of defects	255.245	HIGH
Joining Of Materials Other Than By Welding - General	255.273	HIGH
Joining Of Materials Other Than By Welding - Copper Pipe	255.279	HIGH
Joining Of Materials Other Than By Welding - Plastic Pipe	255.281	HIGH
Plastic pipe: Qualifying persons to make joints	255.285(a),(b),(d)	HIGH
Notification requirements	255.302	HIGH
Compliance with construction standards	255.303	HIGH
Inspection: General	255.305	HIGH
Inspection of materials	255.307	HIGH
Repair of steel pipe	255.309	HIGH
Repair of plastic pipe	255.311	HIGH
Bends and elbows	255.313(a),(b),(c)	HIGH
Wrinkle bends in steel pipe	255.315	HIGH
Installation of plastic pipe	255.321	HIGH
Underground clearance	255.325	HIGH
Customer meters and service regulators: Installation	255.357(d)	HIGH
Service lines: Installation	255.361(e),(f),(g),(h),(i)	HIGH
Service lines: Location of valves	255.365(b)	HIGH
External corrosion control: Buried or submerged pipelines installed after July 31, 1971	255.455(d),(e)	HIGH
External corrosion control: Buried or submerged pipelines installed before August 1, 1971	255.457	HIGH
External corrosion control: Protective coating	255.461(c)	HIGH
External corrosion control: Cathodic protection	255.463	HIGH
External corrosion control: Monitoring	255.465(a),(e)	HIGH
Internal corrosion control: Design and construction of transmission line	255.476(a),(c)	HIGH
Remedial measures: General	255.483	HIGH
Remedial measures: transmission lines	255.485(a),(b)	HIGH
Strength test requirements for steel pipelines to operate at 125 PSIG or more	255.505(a),(b),(c),(d)	HIGH
General requirements (UPGRADES)	255.553 (a),(b),(c),(f)	HIGH
Upgrading to a pressure of 125 PSIG or more in steel pipelines	255.555	HIGH
Upgrading to a pressure less than 125 PSIG	255.557	HIGH
Conversion to service subject to this Part	255.559(a)	HIGH
General provisions	255.603	HIGH
Operator Qualification	255.604	HIGH
Essentials of operating and maintenance plan	255.605	HIGH
Change in class location: Required study	255.609	HIGH
Damage prevention program	255.614	HIGH
Emergency Plans	255.615	HIGH

Customer education and information program	255.616	HIGH
Maximum allowable operating pressure: Steel or plastic pipelines	255.619	HIGH
Maximum allowable operating pressure: High pressure distribution systems	255.621	HIGH
Maximum and minimum allowable operating pressure: Low pressure distribution systems	255.623	HIGH
Odorization of gas	255.625(a),(b)	HIGH
Tapping pipelines under pressure	255.627	HIGH
Purging of pipelines	255.629	HIGH
Control Room Management	255.631(a)	HIGH
Transmission lines: Patrolling	255.705	HIGH
Leakage Surveys - Transmission	255.706	HIGH
Transmission lines: General requirements for repair procedures	255.711	HIGH
Transmission lines: Permanent field repair of imperfections and damages	255.713	HIGH
Transmission lines: Permanent field repair of welds	255.715	HIGH
Transmission lines: Permanent field repair of leaks	255.717	HIGH
Transmission lines: Testing of repairs	255.719	HIGH
Distribution systems: Leak surveys and procedures	255.723	HIGH
Compressor stations: procedures	255.729	HIGH
Compressor stations: Inspection and testing relief devices	255.731	HIGH
Compressor stations: Additional inspections	255.732	HIGH
Compressor stations: Gas detection	255.736	HIGH
Pressure limiting and regulating stations: Inspection and testing	255.739(a),(b)	HIGH
Regulator Station Overpressure Protection	255.743(a),(b)	HIGH
Transmission Line Valves	255.745	HIGH
Prevention of accidental ignition	255.751	HIGH
Protecting cast iron pipelines	255.755	HIGH
Replacement of exposed or undermined cast iron piping	255.756	HIGH
Replacement of cast iron mains paralleling excavations	255.757	HIGH
Leaks: Records	255.807(d)	HIGH
Leaks: Instrument sensitivity verification	255.809	HIGH
Leaks: Type 1	255.811(b),(c),(d),(e)	HIGH
Leaks: Type 2A	255.813(b),(c),(d)	HIGH
Leaks: Type 2	255.815(b),(c),(d)	HIGH
Leak Follow-up	255.819(a)	HIGH
High Consequence Areas	255.905	HIGH
Required Elements (IMP)	255.911	HIGH
Knowledge and Training (IMP)	255.915	HIGH
Identification of Potential Threats to Pipeline Integrity and Use of the Threat Identification in an Integrity Program (IMP)	255.917	HIGH
Baseline Assessment Plan(IMP)	255.919	HIGH
Conducting a Baseline Assessment (IMP)	255.921	HIGH
Direct Assessment (IMP)	255.923	HIGH
External Corrosion Direct Assessment (ECDA) (IMP)	255.925	HIGH
Internal Corrosion Direct Assessment (ICDA) (IMP)	255.927	HIGH
Confirmatory Direct Assessment (CDA) (IMP)	255.931	HIGH
Addressing Integrity Issues (IMP)	255.933	HIGH
Preventive and Mitigative Measures to Protect the High Consequence Areas (IMP)	255.935	HIGH
Continual Process of Evaluation and Assessment (IMP)	255.937	HIGH
Reassessment Intervals (IMP)	255.939	HIGH
General requirements of a GDPIM plan	255.1003	HIGH
Implementation requirements of a GDPIM plan.	255.1005	HIGH
Required elements of a GDPIM plan.	255.1007	HIGH
Required report when compression couplings fail.	255.1009	HIGH
Requirements a small liquefied petroleum gas (LPG) operator must satisfy to implement a GDPIM plan	255.1015	HIGH

HIGH RISK SECTIONS PART 261		
Operation and maintenance plan	261.15	HIGH
Leakage Survey	261.17(a),(c)	HIGH
Carbon monoxide prevention	261.21	HIGH
Warning tag procedures	261.51	HIGH
HEFPA Liaison	261.53	HIGH
Warning Tag Inspection	261.55	HIGH
Warning tag: Class A condition	261.57	HIGH
Warning tag: Class B condition	261.59	HIGH

OTHER RISK SECTIONS PART 255		
ACTIVITY TITLE	CODE SECTION	RISK FACTOR
Preservation of records	255.17	OTH
Compressor station: Design and construction	255.163	OTH
Compressor station: Liquid removal	255.165	OTH
Compressor stations: Additional safety equipment	255.171	OTH
Vaults: Accessibility	255.185	OTH
Vaults: Sealing, venting, and ventilation	255.187	OTH
Calorimeter or calorimeter structures	255.190	OTH
Design pressure of plastic fittings	255.191	OTH
Valve installtion in plastic pipe	255.193	OTH
Instrument, control, and sampling piping and components	255.203	OTH
Limitations On Welders	255.229	OTH
Quality assurance program	255.230	OTH
Preheating	255.237	OTH
Stress relieving	255.239	OTH
Inspection and test of welds	255.241(c)	OTH
Nondestructive testing-Pipeline to operate at 125 PSIG or more	255.243(f)	OTH
Plastic pipe: Qualifying joining procedures	255.283	OTH
Plastic pipe: Qualifying persons to make joints	255.285(c)(e)	OTH
Plastic pipe: Inspection of joints	255.287	OTH
Bends and elbows	255.313(d)	OTH
Protection from hazards	255.317	OTH
Installation of pipe in a ditch	255.319	OTH
Casing	255.323	OTH
Cover	255.327	OTH
Customer meters and regulators: Location	255.353	OTH
Customer meters and regulators: Protection from damage	255.355	OTH
Customer meters and service regulators: Installation	255.357(a)-(c)	OTH
Customer meter installations: Operating pressure	255.359	OTH
Service lines: Installation	255.361(a), (b), (c), (d)	OTH
Service lines: valve requirements	255.363	OTH
Service lines: Location of valves	255.365(a), (c)	OTH
Service lines: General requirements for connections to main piping	255.367	OTH
Service lines: Connections to cast iron or ductile iron mains	255.369	OTH
Service lines: Steel	255.371	OTH
Service lines: Cast iron and ductile iron	255.373	OTH
Service lines: Plastic	255.375	OTH
Service lines: Copper	255.377	OTH
New service lines not in use	255.379	OTH
Service lines: excess flow valve performance standards	255.381	OTH
External corrosion control: Buried or submerged pipelines installed after July 31, 1971	255.455 (a)	OTH
External corrosion control: Examination of buried pipeline when exposed	255.459	OTH
External corrosion control: Protective coating	255.461(a), (b), (d), (e), (f), (g)	OTH
External corrosion control: Monitoring	255.465 (b)(c)(d)(f)	OTH
External corrosion control: Electrical isolation	255.467	OTH
External corrosion control: Test stations	255.469	OTH
External corrosion control: Test lead	255.471	OTH
External corrosion control: Interference currents	255.473	OTH
Internal corrosion control: General	255.475(a)(b)	OTH
Atmospheric corrosion control: General	255.479	OTH
Atmospheric corrosion control: Monitoring	255.481	OTH
Remedial measures: transmission lines	255.485(c)	OTH
Remedial measures: Pipelines lines other than cast iron or ductile iron lines	255.487	OTH
Remedial measures: Cast iron and ductile iron pipelines	255.489	OTH
Direct Assessment	255.490	OTH
Corrosion control records	255.491	OTH
General requirements (TESTING)	255.503	OTH
Strength test requirements for steel pipelines to operate at 125 PSIG or more	255.505 (e),(h), (i)	OTH
Test requirements for pipelines to operate at less than 125 PSIG	255.507	OTH
Test requirements for service lines	255.511	OTH
Environmental protection and safety requirements	255.515	OTH
Records (TESTING)	255.517	OTH
Notification requirements (UPGRADES)	255.552	OTH
General requirements (UPGRADES)	255.553 (d)(e)	OTH
Conversion to service subject to this Part	255.559(b)	OTH

Change in class location: Confirmation or revision of maximum allowable operating pressure	255.611(a), (d)	OTH
Continuing surveillance	255.613	OTH
Odorization	255.625 (e)(f)	OTH
Pipeline Markers	255.707(a),(c),(d),(e)	OTH
Transmission lines: Record keeping	255.709	OTH
Distribution systems: Patrolling	255.721(b)	OTH
Test requirements for reinstating service lines	255.725	OTH
Inactive Services	255.726	OTH
Abandonment or inactivation of facilities	255.727(b)-(g)	OTH
Compressor stations: storage of combustible materials	255.735	OTH
Pressure limiting and regulating stations: Inspection and testing	255.739 (c), (d)	OTH
Pressure limiting and regulating stations: Telemetering or recording gauges	255.741	OTH
Regulator Station MAOP	255.743 (c)	OTH
Service Regulator - Min.& Oper. Load, Vents	255.744	OTH
Distribution Line Valves	255.747	OTH
Valve maintenance: Service line valves	255.748	OTH
Regulator Station Vaults	255.749	OTH
Caulked bell and spigot joints	255.753	OTH
Reports of accidents	255.801	OTH
Emergency lists of operator personnel	255.803	OTH
Leaks General	255.805 (a), (b), (e), (g), (h)	OTH
Leaks: Records	255.807(a)-(c)	OTH
Type 3	255.817	OTH
Interruptions of service	255.823 (a)-(b)	OTH
Logging and analysis of gas emergency reports	255.825	OTH
Annual Report	255.829	OTH
Reporting safety-related conditions	255.831	OTH
General (IMP)	255.907	OTH
Changes to an Integrity Management Program (IMP)	255.909	OTH
Low Stress Reassessment (IMP)	255.941	OTH
Measuring Program Effectiveness (IMP)	255.945	OTH
Records (IMP)	255.947	OTH
Records an operator must keep	255.1011	OTH

OTHER RISK SECTIONS PART 261		
High Pressure Piping - Annual Notice	261.19	OTH
Warning tag: Class C condition	261.61	OTH
Warning tag: Action and follow-up	261.63(a)-(h)	OTH
Warning Tag Records	261.65	OTH