February 17, 2015

VIA ELECTRONIC MAIL

Honorable Kathleen Burgess
Secretary to the Commission
New York State Public Service Commission
Three Empire Plaza
Albany, New York 12223

Re: Case 04-M-0159 - Proceeding on Motion of the Commission to Examine the Safety of Consolidated Edison Company of New York, Inc.'s Electric Transmission and Distribution Systems.

Dear Secretary Burgess:

New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation submits for filing the 2014 Annual Stray Voltage Testing and Facility Inspection Reports in the above referenced proceeding.

If you have any questions pertaining to this information, please contact Jennifer R. Smith at 585.771.4282

Respectfully submitted,

Lori A. Cole
Manager - Regulatory & Tariffs
Rates and Regulatory Economics

Enclosure

New York State Electric & Gas Corporation

STRAY VOLTAGE TEST AND FACILITY INSPECTION PROGRAM

Report on the results of Stray Voltage Tests and Facility Inspections for the 12-month period ending on December 31, 2014

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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, with subsequent revisions issued on July 21, 2005, December 15, 2008, March 22, 2013, and January 13, 2015 (Case 04-M-0159), and July 21, 2010 and June 23, 2011 (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 streetlights and underground electric facilities, and test their overhead distribution facilities, overhead and underground transmission facilities, underground residential distribution facilities, and substation fences for stray voltage every five years coinciding with their electric facility inspections.

This report describes New York State Electric & Gas's Stray Voltage Detection Program and Equipment Inspection Program conducted in 2014.

II. Company Overview

NYSEG, a subsidiary of Iberdrola USA Networks, serves 881,000 electricity customers and 263,000 natural gas customers across more than 40% of upstate New York. Iberdrola USA Networks, an indirect subsidiary of global energy leader Iberdrola, S.A., is an energy services and delivery company with nearly 3 million customers in upstate New York and New England.

NYSEG's electric delivery infrastructure consists of more than 430 substations, approximately 44,542 underground facilities and 8,379 streetlight/traffic signal facilities. This system includes an estimated 814,828 distribution structures and 68,708 transmission structures.

III. Stray Voltage Testing Program

During the period ending December 31, 2014, NYSEG conducted stray voltage testing of all its publicly accessible underground electric facilities, and all Company and non-Company owned metallic streetlights and traffic signals, as well as approximately 20% of its overhead transmission and distribution facilities, and underground residential distribution facilities that are capable of conducting electricity. 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 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 190,683 facilities visited, 40,317 did not require stray voltage testing because these structures and their associated equipment are non-metallic and incapable of conducting electricity.

Structures Inaccessible to the Public

Contractors made every attempt to locate and test all structures. 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. Of the 190,683 facilities visited, 1,309 were deemed Inaccessible to the public. As described below, there are several types of Inaccessible structures:

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 2014, NYSEG has no temporary repair exceptions to report.

V. Company Facilities

Structure Categories

NYSEG has approximately 149,057 individual facilities that require testing for the presence of stray voltage in 2014. These facilities are broken down into four main categories including:

Distribution Overhead – There are approximately 96,618 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 10,439 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 16,934 metallic street lights and approximately 15,809 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 9,154 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 103 substation fences that require 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 streetlights and underground electric facilities, and 20% of the overhead distribution facilities, overhead and underground transmission facilities, underground residential distribution facilities, and substation fences for the period ending December 31, 2014.

In addition, in compliance with the Safety Standards, NYSEG has met the fifth year annual performance target for inspection of its electric facilities for the period ending December 31, 2014; thus completing the second full cycle.

The results are summarized in the table below.

Facility Inspection Program Results

Category	**NYSEG Inspection Target**	**Actual Cumulative Inspected as of 2014**
Overhead Distribution	100%	100%
Overhead Transmission	100%	100%
Underground	100%	100%
Streetlight	100%	100%

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	177,732	64%
2013	160,341	83%
2014	134,924	100%

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	29%
2011	13,869	50%
2012	13,299	69%
2013	9,994	83%
2014	11,403	100%

Underground Facilities

Inspection Year	Number of Underground Facilities Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	11,488	26%
2011	6,706	41%
2012	6,691	56%
2013	9,206	77%
2014	10,451	100%

Streetlights

Inspection Year	Number of Streetlights Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	1,970	24%
2011	848	34%
2012	1,191	48%
2013	2,135	73%
2014	2,235	100%

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 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."

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. The detection rate for all findings in 2014 as shown in Appendix 1 is .055%. 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. Upon excluding these normal occurring voltages results in a detection rate of .0003% which more accurately represents confirmed abnormality across our system. A Summary of Energized Objects can be found in Appendix 2 of this report.

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 imbalance between phases; long low voltage single phase circuit spurs with high current loads; and/or proximity to transmission lines.

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.

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 two additional objects were tested under this requirement and both tested 0 volts.

IX. Analysis of Inspection Results

Overhead Distribution Structures

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
134,924	17,179	12.73%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	144	.84%
2	2,148	12.50%
3	3,894	22.67%
4	10,993	63.99%
Total:	17,179	100%

Overhead Transmission Facilities

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
11,403	1,112	9.75%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	5	.45%
2	102	9.17%
3	745	67.0%
4	260	23.38%
Total:	1,112	100%

Underground Facilities

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
10,451	556	5.32%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	45	8.09%
2	91	16.37%
3	235	42.27%
4	185	33.27%
Total:	556	100%

Streetlights

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
2,235	105	4.70%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	0	0%
2	1	.95%
3	21	20.0%
4	83	79.05%
Total:	105	100%

In 2014, a total of 18,952 deficiencies were identified through scheduled inspections which represent a deficiency rate of about 11.92% of the unique inspections performed.

Overhead Distribution, Streetlights, and Underground inspections were performed using a Distribution Line Inspection ("DLI") Toughbook. The DLI Toughbooks are portable laptop computers with pre-loaded software that displays all assets to be inspected and includes pre-formatted inspection pick tables the inspectors will use to document individual inspections. The DLI Toughbook has built-in GPS capability that displays its real-time position in relation to any company asset. Inspectors are required to document all inspections on the DLI Toughbook, and the resulting data is uploaded into the Company SAP system. Overhead transmission inspections are performed using maps that display specific lines to be inspected and resulting data is also uploaded into the Company SAP system.

Notifications are made from the deficiencies in the SAP system and are sent to field crews noting the repair. When completed, the field crews close out the notification. The company routinely monitors these notifications to report status of the program and track any follow-up repairs.

X. Stray Voltage Testing and Inspection QA/QC Programs

Stray Voltage Testing QA/QC Program

Stray voltage testing data is acquired through two means. The first is in conjunction with a distribution line (DLI) facility inspection where a stray voltage test is performed at the same time an inspector is doing a DLI inspection. Stray voltage test data is stored on the DLI toughbook and is acquired by the Company through weekly uploads along with inspection data.

The second means is in conjunction with planned transmission line (TLI) facility inspections and the annual obligation to test all streetlights, traffic signal equipment, and underground facilities. This testing data is captured on a separate handheld PDA device. These PDA units are preloaded with all the scheduled testable objects and given to field testers. Resulting test data is stored on the PDA and forwarded to the company in batch files.

DLI (Tough Book) Test Data

Stray voltage tests were conducted on all distribution facilities scheduled for inspection. Since the testing is done at the same time of inspection, test records are linked to the inspection record assuring a test for each asset.
Inspectors upload this test data into Company files each week. Upon receipt of these files, QA/QC personnel verify not only every inspected

asset has a test record but also all the required data fields are populated accurately.

Handheld PDA Test Data

All other required stray voltage tests conducted and collected by the inspecting/testing contractor are captured utilizing a Trimble GeoXt handheld device (PDA) and submitted to the Company in the form of batches. These batch files are subject to multiple QA/QC reviews.

The first review assesses data accuracy. Batch files are scanned to ensure proper formatting and appropriate data is populated in each of the required fields. If approved, the file is loaded into a production database.

Once in the database, a second review is made to check the data for positional (GPS) accuracy and content. QA/QC personnel check new data to make sure a test is performed at all planned locations. They do this by comparing the new test data against a control set of planned test data sent to the testing contractor in the beginning of the year. They also check to see if time stamps on each test are reasonable and all reported findings are documented and follow up repairs are scheduled accordingly. If any part of the data is not acceptable, the batch is rejected and the contractor is notified of the reasons for failure. The testing contractor remediates the problems and re-submits the rejected batch file with corrections. Final repair efforts are monitored with company crews on all findings to ensure they are made.

At the end of each year, QA/QC personnel check company asset records to gather any new installations constructed in the current year. This evaluation allows us to identify any new structures which are included in the testing contractor's scope to obtain.

On an ongoing basis, NYSEG performs additional 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 necessary, 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, or incorrect spellings are also 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

A thorough review of inspection data is made by QA/QC personnel to evaluate the effectiveness of the following three primary focus areas.

Focus Area 1- Ensure all planned inspections (that make up the 20% obligation) developed for the current year are performed. To do this, a 5 year plan is established for each cycle which details what transmission and distribution circuits, and accompanying assets, are scheduled for any given year. This plan assures that all circuits are scheduled and any given year's asset count is balanced to the 20% goal. The scope of the inspection plan is communicated to the inspector contractor through data on the toughbook and supplemental drawings. Inspection results are returned to the company each week. QA/QC personnel review progress to validate all planned inspections are made.

Focus Area 2 - Ensure inspector's evaluation of asset condition is accurate and consistent and performed in accordance with established procedures and applicable training manuals. To do this, QA/QC personnel conduct two types of assessments.

> The first is a field review. In the field review QA/QC personnel are given a list of assets to visit and inspect. This asset list consists of recent inspections made by our inspection contractor though the QA/QC personnel are unaware of the reported results and independently inspect them. Results are then compared.
>
> The second review is made in the office. This review looks at deficiencies reported by the inspection contractor. All reported deficiencies have photographs attached. QA/QC personnel review deficiencies and their pictures to assert the accuracy of the reported problem and assigned priority. Any problems noted from this focus area are communicated back to the inspectors for correction.

Focus Area 3 – Ensure all reported repairs made on deficiencies found, as a result of the inspection program are completed. QA/QC personnel select a sample set of reported deficiencies and associated repairs made throughout each division. This sample set is given to the QA/QC personnel to be field verified. QA/QC personnel visit each specific asset and validate whether the reported repair work has been made. Any issues found with this effort are communicated back to company personnel for follow-up action.

Appendix 1 Stray Voltage Testing Summary

NYSEG Testing Summary	Total System Units Requiring Testing	Units Completed	Percent Completed	Units with Voltage Found (>= 1.0v)	Percent of Units Tested with Voltage (>= 1.0v)	Units Classified as Inaccessible
Distribution Facilities	134,029	134,029	100%	13	0.010%	687
Underground Facilities	13,305	13,305	100%	0	0.000%	392
Street Lights / Traffic Signals	32,817	32,817	100%	50	0.152%	68
Substation Fences	103	103	100%	0	0.000%	0
Overhead Transmission	10,429	10,429	100%	41	0.393%	162
TOTAL	190,683	190,683	100%	104	0.055%	1,309

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	11	1	1	**13**	10	0	0
Pole				0			
Ground	4	1	1	6	6	0	0
Guy	6	0	0	6	3	0	0
Riser	1	0	0	1	1	0	0
Other				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	3	24	23	**50**	37	0	0
Metal Street Light Pole	1	24	23	48	36	0	0
Traffic Signal Pole	2	0	0	2	1	0	0
Pedestrian Crossing Pole				0			
Traffic Control Box				0			
Other				0			
Substation Fences	0	0	0	**0**	0	0	0
Fence				0			
Other				0			
Transmission (Total)	33	8	0	**41**	2	31	8
Lattice Tower				0			
Pole				0			
Ground	27	4	0	31	1	26	4
Guy	6	4	0	10	1	5	4
Other				0			
Miscellaneous Facilities	0	0	0	**0**	0	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				0			
Other				0			

Appendix 3 Summary of Shock Reports from the Public

	Data collected as of December 31, 2014	Yearly Total
I.	**Total Shock Calls Received:**	**18**
	Unsubstantiated	**3**
	Normally Energized Equipment	**4**
	Stray Voltage:	**11**
	Person	10
	Animal	1
II.	**Injuries Sustained/Medical Attention Received:**	**9**
	Person	4
	Animal	5
III.	**Stray Voltage Source:**	**11**
	Utility Responsibility (Total)	**1**
	Overhead Distribution System	1
	Underground Distribution System	0
	Transmission System	0
	Other Utility/Gov't Agency (Total)	**0**
	Streetlight	0
	Other (Total)	0
	Customer Responsibility (Total)	**10**
IV.	**Stray Voltage Range:**	**11**
	1.0V to 4.4V	1
	4.5V to 24.9V	0
	25V and above	1
	Unknown	9

Appendix 4

New York State Electric and Gas

Annual Summary of Deficiencies and Repair Activity Resulting from the Inspection Process

As of December 31, 2014

Detail of Deficiences by Facilities	2010				2011				2012				2013				2014			
Priority Level / **Repair Expected**	I Within 1 week	II Within 1 year	III Within 3 years	IV	I Within 1 week	II Within 1 year	III Within 3 years	IV	I Within 1 week	II Within 1 year	III Within 3 years	IV	I Within 1 week	II Within 1 year	III Within 3 years	IV	I Within 1 week	II Within 1 year	III Within 3 years	IV
Overhead Facilities																				
Repaired in Time Frame	219	636	766	952	114	886	1152	836	107	1,695	5,299	2,673	161	1,400	2,059	1,754	101	404	1,215	277
Repaired - Overdue	33	31	67	0	24	268	90	0	46	701	1	0	23	201	0	0	38	0	0	0
Not Repaired - Not Due	0	0	0	1,357	0	0	0	2,940	0	33	6,759	25,294	0	0	4,454	15,615	0	1,749	2,679	10,716
Not Repaired - Overdue	0	0	2	0	2	0	144	0	0	25	0	0	0	54	0	0	0	0	0	0
Total Overhead Facilities	**252**	**667**	**835**	**2,309**	**140**	**1154**	**1386**	**3,776**	**153**	**2454**	**12059**	**27,967**	**184**	**1655**	**6513**	**17,369**	**139**	**2153**	**3894**	**10,993**
Underground Facilities																				
Repaired in Time Frame	39	51	25	88	6	10	5	0	0	5	3	1	22	30	2	2	7	0	2	20
Repaired - Overdue	1	0	9	0	0	3	0	0	0	0	0	0	21	0	0	0	5	0	0	0
Not Repaired - Not Due	0	0	0	28	0	0	0	0	0	0	6	8	0	0	76	112	0	50	181	126
Not Repaired - Overdue	0	0	0	0	0	0	0	0	0	0	0	0	0	5	0	0	13	0	0	0
Total Underground Facilities	**40**	**51**	**34**	**116**	**6**	**13**	**5**	**0**	**0**	**5**	**9**	**9**	**43**	**35**	**78**	**114**	**25**	**50**	**183**	**146**
Pad Mount Facilities																				
Repaired in Time Frame	49	150	183	413	17	60	97	157	16	33	124	26	33	11	7	8	13	5	2	3
Repaired - Overdue	5	13	7	0	1	21	2	0	7	2	0	0	7	3	0	0	3	0	0	0
Not Repaired - Not Due	0	0	0	146	0	0	0	23	0	0	402	346	0	0	51	134	0	36	50	36
Not Repaired - Overdue	0	0	0	0	0	0	3	0	0	0	0	0	0	6	0	0	4	0	0	0
Total Pad Mount Facilities	**54**	**163**	**190**	**559**	**18**	**81**	**102**	**180**	**23**	**35**	**526**	**372**	**40**	**20**	**58**	**142**	**20**	**41**	**52**	**39**
Streetlight Facilities																				
Repaired in Time Frame	6	102	0	2	0	1	1	0	0	6	4	0	0	2	5	1	0	0	0	0
Repaired - Overdue	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Not Repaired - Not Due	0	0	0	31	0	0	0	0	0	0	13	7	0	0	176	30	0	1	21	83
Not Repaired - Overdue	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	0	0	0	0	0
Total Streetlight Facilities	**6**	**102**	**0**	**33**	**0**	**1**	**1**	**0**	**0**	**6**	**17**	**7**	**0**	**4**	**181**	**31**	**0**	**1**	**21**	**83**
Transmission Facilities																				
Repaired in Time Frame	91	156	417	137	15	96	270	74	2	69	214	71	1	16	199	1	5	2	9	0
Repaired - Overdue	2	55	112	0	1	100	66	0	0	27	0	0	0	1	0	0	0	0	0	0
Not Repaired - Not Due	0	0	0	627	0	0	0	364	0	0	485	506	0	0	635	128	0	100	736	260
Not Repaired - Overdue	0	0	15	0	0	1	151	0	0	0	0	0	0	4	0	0	0	0	0	0
Total Transmission Facilities	**93**	**211**	**544**	**764**	**16**	**197**	**487**	**438**	**2**	**96**	**699**	**577**	**1**	**21**	**834**	**129**	**5**	**102**	**745**	**260**

Appendix 4

Summary of Deficiencies and Repair Activity Resulting from the Inspection Process

Year	Priority Level / Repair Expected		Deficiencies Found (Total)	Repaired In Time Frame	Repaired - Overdue	Not Repaired - Not Due	Not Repaired - Overdue
2010							
	I	Within 1 week	**445**	404	41	0	0
	II	Within 1 year	**1,194**	1095	99	0	0
	III	Within 3 years	**1,603**	1,391	195	0	17
	IV	N/A	**3,781**	1,592	n/a	2,189	n/a
2011							
	I	Within 1 week	**180**	152	26	0	2
	II	Within 1 year	**1,446**	1,053	392	0	1
	III	Within 3 years	**1,981**	1,525	158	0	298
	IV	N/A	**4,394**	1,067	n/a	3,327	n/a
2012							
	I	Within 1 week	**178**	125	53	0	0
	II	Within 1 year	**2,596**	1,808	730	33	25
	III	Within 3 years	**13,310**	5,644	1	7,665	0
	IV	N/A	**28,932**	2,771	n/a	26,161	n/a
2013							
	I	Within 1 week	**268**	217	51	0	0
	II	Within 1 year	**1,735**	1,459	205	0	71
	III	Within 3 years	**7,664**	2,272	0	5,392	0
	IV	N/A	**17,785**	1,766	n/a	16,019	n/a
2014							
	I	Within 1 week	**189**	126	46	0	17
	II	Within 1 year	**2,347**	411	0	1,936	0
	III	Within 3 years	**4,895**	1,228	0	3,667	0
	IV	N/A	**11,521**	300	n/a	11,221	n/a

CERTIFICATION
[FACILITY INSPECTIONS]

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

Franklyn Reynolds, on this 6th day of February 2015, certifies as follows:

1. I am the Vice President, Asset Management and Planning of New York State Electric & Gas (the "Company"), and in that capacity I make this Certification for the annual period ending December 31st, 2014 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, December 15, 2008, March 22, 2013, and January 13, 2015 in Case 04-M-0159 and July 21, 2010 and June 23, 2011 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, 2014 (the "Twelve-Month Period"). I hereby certify that the utility has exercised due diligence in carrying out a plan designed to meet the inspection requirements, including quality assurance, and, to the best of my knowledge, the utility has inspected the requisite number of electric facilities. In addition, the utility has inspected all of its electric facilities during the previous five year period, except those identified in the Annual Report.

Franklyn D. Reynolds

Sworn to before me this 6th day of February, 2015

Notary Public:

ANNA M. SABERS
Notary Public, State of New York
No. 01SA6072590
Qualified in Monroe County
Commission Expires April 08, 2018

Exhibit 1

CERTIFICATION
[STRAY VOLTAGE TESTING]

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

Franklyn D. Reynolds on this 6th day of February 2015 certifies as follows:

1. I am the Vice President, Asset Management and Planning of New York State Electric & Gas (the "Company"), and in that capacity I make this Certification for the annual period ending December 31st, 2014 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, December 15, 2008, March 22, 2013 and January 13, 2015 in Case 04-M-0159 and July 21, 2010 and June 23, 2011 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, 2014 (the "Twelve-Month Period").

4. I hereby certify that the Company exercised due diligence in carrying out a plan designed to meet the stray voltage testing requirements, including quality assurance, and, to the best of my knowledge, the Company has tested all of its publically accessible electric facilities and streetlights, except those identified in the Annual Report. 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.

Franklyn D. Reynolds

Sworn to before me this 6th day of February,2015
Notary Public:

ANNA M. SABERS
Notary Public, State of New York
No. 01SA6072590
Qualified in Monroe County
Commisson Expires April 08, 20 18

IBERDROLA USA

Rochester Gas and Electric Corporation

STRAY VOLTAGE TEST AND FACILITY INSPECTION PROGRAM

Report on the results of Stray Voltage Tests and Facility Inspections for the 12-month period ending on December 31, 2014

Table of Contents

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, March 22, 2013, July 21, 2010 and January 13, 2015 (Case 10-E-0271), (collectively referred to herein as the "Safety Standards" or "Order"), require electric utilities in New York State, including Rochester Gas and Electric ("RG&E" or the "Company") to test annually all of their publicly accessible streetlights and underground electric facilities, and test their overhead distribution facilities, overhead and underground transmission facilities, underground residential distribution facilities, and substation fences for stray voltage every five years coinciding with their electric facility inspections.

This report describes the Rochester Gas and Electric Stray Voltage Detection Program, the Mobile Stray Voltage Program, and the Equipment Inspection Program conducted in 2014.

II. Company Overview

RG&E, a subsidiary of Iberdrola USA Networks, serves 371,000 electricity customers and 307,000 natural gas customers in a nine-county region centered on the City of Rochester. Iberdrola USA Networks, an indirect subsidiary of global energy leader Iberdrola, S.A., is an energy services and delivery company with nearly 3 million customers in upstate New York and New England.

RG&E's electric delivery infrastructure consists of more than 150 substations, approximately 46,005 underground facilities and 2,608 streetlight/traffic signal facilities. This system includes an estimated 208,963 distribution structures and 19,349 transmission structures.

III. Stray Voltage Testing Program

During the period ending December 31, 2014, RG&E conducted stray voltage testing of all its publicly accessible underground electric facilities, and all Company and non-Company owned metallic streetlights and traffic signals, as well as approximately 20% of its overhead transmission and distribution facilities, and underground residential distribution facilities that are capable of conducting electricity. The Company also tested all publicly accessible third party facilities in close proximity to RG&E's system components identified with elevated voltage.

In accordance with the Order, RG&E:

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 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 83,823 facilities visited, 13,127 did not require stray voltage testing because these structures and their associated equipment are non-metallic and incapable of conducting electricity.

Structures Inaccessible to the Public

Contractors made every attempt to locate and test all structures. If the contractor could not reach a structure to perform a test, it was identified as "Inaccessible" and all other pertinent data was collected in the field. Of the 83,823 facilities visited, 304 were deemed Inaccessible to the public. As described below, there are several types of Inaccessible structures:

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. RG&E 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, RG&E personnel verified that the structure was actually inside the building. If the RG&E 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 RG&E 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, RG&E 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 2014, RG&E has no temporary repair exceptions to report.

V. Company Facilities

Structure Categories

RG&E has approximately 70,392 individual facilities that require testing for the presence of stray voltage for 2014. These facilities are broken down into four main categories including:

Distribution Overhead – There are approximately 19,571 distribution pole structures that require testing for the presence of stray voltage in RG&E'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 24,976 underground facilities that require testing for the presence of stray voltage that comprise RG&E's system. The testing criteria are comprised of subsurface structures, including above ground pad-mounted structures. Included in the underground facilities are padmount switchgear cases, padmount 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 12,063 metallic street lights and approximately 11,459 traffic signals within RG&E's service territory that require stray voltage testing. This total includes all conductive street lights owned by RG&E with the balance of the equipment owned by various municipalities. The testing criterion includes 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 2,289 individual poles/towers that require testing for the presence of stray voltage that comprise RG&E's transmission system. The testing criteria are 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 a total of 34 substation fences in RG&E's territory that require testing for the presence of stray voltage.

VI. Annual Performance Targets

RG&E 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, RG&E has met the annual performance target for stray voltage testing of 100% of streetlights and underground electric facilities, and 20% of the overhead distribution facilities, overhead and underground transmission facilities, underground residential distribution facilities, and substation fences for the period ending December 31, 2014.

In addition, in compliance with the Safety Standards, RG&E has met the fifth year annual performance target for inspection of its electric facilities for the period ending December 31, 2014; thus completing the second full cycle.

The results are summarized in the table below.

Facility Inspection Program Results

Category	**RG&E Inspection Target**	**Actual Cumulative Inspected as of 2014**
Overhead Distribution	100%	100%
Overhead Transmission	100%	100%
Underground	100%	100%
Streetlight	100%	100%

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	39,325	19%
2011	46,760	41%
2012	46,061	62%
2013	42,580	83%
2014	34,237	100%

Overhead Transmission Facilities

Inspection Year	Number of Overhead Transmission Facilities Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	6,570	33%
2011	2,804	47%
2012	1,927	57%
2013	1,313	64%
2014	6,735	100%

Underground Facilities

Inspection Year	Number of Underground Facilities Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	4,227	18%
2011	6,175	44%
2012	4,691	63%
2013	6,287	89%
2014	4,643	100%

Pad-mount Facilities

Inspection Year	Number of Underground Facilities Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	3,760	19%
2011	4,658	43%
2012	4,688	68%
2013	3,225	84%
2014	3,651	100%

Streetlights

Inspection Year	Number of Streetlights Inspected	% of Overall System Inspected (Cumulative in Five Year Cycle 2010-2014)
2010	1,347	52%
2011	0	52%
2012	6	52%
2013	340	65%
2014	915	100%

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 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 stray voltage 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. The detection rate for all findings in 2014 as shown in Appendix 1

is .233%. 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. Upon excluding these normal occurring voltages results in a detection rate of .218% which more accurately represents confirmed abnormality across our system. A summary of energized objects can be found in Appendix 2 of this report.

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 imbalance between phases; long low voltage single phase circuit spurs with high current loads; and/or proximity to transmission lines.

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, RG&E has been able to repair these issues and mitigate the danger associated with the elevated voltage.

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 there were no objects reported as tested within a 30 foot radius of any energized objects.

IX. Analysis of Inspection Results

Overhead Distribution Structures

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
34,237	3,948	11.53%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	26	.66%
2	538	13.63%
3	929	23.53%
4	2,455	62.18%
Total:	3,948	100%

Overhead Transmission Facilities

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
6,735	422	6.27%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	0	0%
2	9	2.13%
3	318	75.36%
4	95	22.51%
Total:	422	100%

Underground Facilities

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
4,643	158	3.40%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	3	1.90%
2	85	53.80%
3	56	35.44%
4	14	8.86%
Total:	158	100%

Pad-mounts

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
3,651	73	2.00%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	26	35.62%
2	10	13.70%
3	26	35.62%
4	11	15.07%
Total:	73	100%

Streetlights

Table of Locations with Deficiencies

Locations Inspected	Locations w/ Deficiencies	% Locations w/ Deficiencies
915	27	2.95%

Breakdown of Locations with Deficiencies

Priority Rating	Number of Deficiencies	% Deficiencies Found
1	0	0%
2	0	0%
3	0	0%
4	27	100%
Total:	27	100%

In 2014, a total of 4,628 deficiencies were identified through scheduled inspections which represent a deficiency rate of about 1.67% of the unique inspections performed.

Overhead Distribution, Streetlights, and Underground inspections were performed using a Distribution Line Inspection ("DLI") Toughbook. The DLI Toughbooks are portable laptop computers with pre-loaded software that displays all assets to be inspected and includes pre-formatted inspection pick tables the inspectors will use to document individual inspections. The DLI Toughbook has built-in GPS capability that displays its real-time position in relation to any company asset. Inspectors are required to document all inspections on the DLI Toughbook, and the resulting data is uploaded into the Company SAP system. Overhead transmission inspections are performed using maps that display specific lines to be inspected and resulting data is also uploaded into the Company SAP system.

Notifications are made from the deficiencies in the SAP system and are sent to field crews noting the repair. When completed, the field crews close out the notification. The company routinely monitors these notifications to report status of the program and track any follow-up repairs.

X. Stray Voltage Testing and Inspection QA/QC Programs

Stray Voltage Testing QA/QC Program

Stray voltage testing data is acquired through three means. The first is in conjunction with a distribution line (DLI) facility inspection where a stray voltage test is performed at the same time an inspector is doing a DLI inspection. Stray voltage test data is stored on the DLI Toughbook and is acquired by the Company through weekly uploads along with inspection data.

The second means is in conjunction with planned transmission line (TLI) facility inspections and the annual obligation to test all streetlights, traffic signal equipment, and underground facilities. This testing data is captured on a separate handheld PDA device. These PDA units are preloaded with all the scheduled testable objects and given to field testers. Resulting test data is stored on the PDA and forwarded to the company in batch files.

The third means is through our mobile testing effort where data is acquired and tracked in a database system managed by the mobile testing vendor. The mobile vendor submits critical findings to the Company on a daily basis and detailed finding information weekly in the form of batches.

DLI (Tough Book) Test Data

Stray voltage tests were conducted on all distribution facilities scheduled for inspection. Since the testing is done at the same time of inspection, test records are linked to the inspection record assuring a test for each asset.
Inspectors upload this test data into Company files each week. Upon receipt of these files, QA/QC personnel verify not only every inspected asset has a test record but also all the required data fields are populated accurately.

Handheld PDA Test Data

All other required stray voltage tests conducted and collected by the inspecting/testing contractor are captured utilizing a Trimble GeoXt handheld device (PDA) and submitted to the Company in the form of batches. These batch files are subject to multiple QA/QC reviews.

The first review assesses data accuracy. Batch files are scanned to ensure proper formatting and appropriate data is populated in each of the required fields. If approved, the file is loaded into a production database.

Once in the database, a second review is made to check the data for positional (GPS) accuracy and content. QA/QC personnel check new data to make sure a test is performed at all planned locations. They do this by comparing the new test data against a control set of planned test data sent to the testing contractor in the beginning of the year. They also check to see if time stamps on each test are reasonable and all reported findings are documented and follow up repairs are scheduled accordingly. If any part of the data is not acceptable, the batch is rejected and the contractor is notified of the reasons for failure. The testing contractor remediates the problems and re-submits the rejected batch file with corrections. Final repair efforts are monitored with company crews on all findings to ensure they are made.

Mobile Testing Data

Prior to the mobile scan of the City of Rochester, RG&E provides the vendor with specific locations within the City they are to mobile scan. All data is collected by the mobile vendor in a database system and submitted to RG&E in a specific format. RG&E QA/QC personnel assure that all specified locations are scanned and all critical findings are collected and documented correctly.

At the end of each year, QA/QC personnel check company asset records to gather any new installations constructed in the current year. This evaluation allows us to identify any new structures which are included in the testing contractor's scope to obtain.

On an ongoing basis, RG&E performs additional 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 necessary, 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, or incorrect spellings are also 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

A thorough review of inspection data is made by QA/QC personnel to evaluate the effectiveness of the following three primary focus areas.

Focus Area 1- Ensure all planned inspections (that make up the 20% obligation) developed for the current year are performed. To do this, a 5 year plan is established for each cycle which details what transmission and distribution circuits, and accompanying assets, are scheduled for any given year. This plan assures that all circuits are scheduled and any given year's asset count is balanced to the 20% goal. The scope of the inspection plan is communicated to the inspector contractor through data on the toughbook and supplemental drawings. Inspection results are returned to the company each week. QA/QC personnel review progress to validate all planned inspections are made.

Focus Area 2 - Ensure inspector's evaluation of asset condition is accurate and consistent and performed in accordance with established procedures and applicable training manuals. To do this, QA/QC personnel conduct two types of assessments.

The first is a field review. In the field review QA/QC personnel are given a list of assets to visit and inspect. This asset list consists of recent inspections made by our inspection contractor though the QA/QC personnel are unaware of the reported results and independently inspect them. Results are then compared.

The second review is made in the office. This review looks at deficiencies reported by the inspection contractor. All reported deficiencies have photographs attached. QA/QC personnel review deficiencies and their pictures to assert the accuracy of the reported problem and assigned priority. Any problems noted from this focus area are communicated back to the inspectors for correction.

Focus Area 3 – Ensure all reported repairs made on deficiencies found, as a result of the inspection program are completed. QA/QC personnel select a sample set of reported deficiencies and associated repairs made throughout each division. This sample set is given to the QA/QC personnel to be field verified. QA/QC personnel visit each specific asset and validate whether the reported repair work has been made. Any issues found with this effort are communicated back to company personnel for follow-up action.

XI. Report of Findings from the Mobile Detection Program

Background

Pursuant to the Public Service Commission's *Order Requiring Additional Mobile Stray Voltage Testing* ("Order"), Case 10-E-0271- In the Matter of Examining the Mobile Testing Requirements of the Electric Safety Standards, issued and effective July 21, 2010 and January 13, 2015; Rochester Gas and Electric ("RG&E") submits its 2014 Mobile Stray Voltage Testing Results.

In accordance with the Order, RG&E's annual Mobile Stray Voltage Testing obligation consists of one mobile scan of the underground network within the City of Rochester. This year (2014) marks the sixth consecutive year RG&E has been performing mobile testing in the City of Rochester, which began in 2009. RG&E contracted with Power Survey, 25 Campus Drive, Kearny, NJ 07031 to perform the 2014 mobile stray voltage testing effort.

The Mobile Scan of Rochester

Mobile testing commenced on October 27, 2014 at darkness each night in order to ensure all street light circuits would be energized. Power Survey provided a single crew (2 Technicians) and their truck mounted test equipment and drove the 331 street miles identified by RG&E requiring mobile testing. City agencies were given advance notice of the event to prepare for

any questions or concerns residents of the city might have. Upon conclusion of field testing, all data was received and validated through various QA/QC reviews by RG&E.

Mobile Testing Process

Power Survey scanned all identified city streets using their SVD2000 mobile system and upon detecting an energized object stopped the vehicle to investigate, identify, measure, and properly document the finding in accordance to RG&E's Stray Voltage Mobile Test Procedure.

In addition to the mobile detection equipment and technicians provided by Power Survey, RG&E provided two full-time Field Coordinators and an electrician. The Field Coordinators accompanied the Power Survey crew throughout the testing effort monitoring the mobile testing activities and collecting GPS data. GPS data was used to document nightly progress, and provide positional attributes to structures with detected voltages aiding in analysis and follow-up repairs. The Field Coordinators also collected independent data on all detections including all false positives, ensured all documented voltage reads were accurate, and with the electrician, made sure all findings were immediately made safe.

Mobile Testing Results

The mobile scan of the City of Rochester included approximately 19,304 testable structures and the results for this effort are as follows:

2013 Mobile Testing Summary of Events		
Total Number of Events	170	
Below 4.5 Volts	151	88.8%
Greater or Equal to 4.5 And Less Than 25 Volts	17	10%
Greater or Equal to 25 Volts	2	1.2%

The table below categorizes all the low voltage findings into smaller voltage classes to illustrate the specific findings.

Breakdown Of Voltages Below 4.5 Volts		
Total Number of Events < 4.5 volts	151	
1-1.9 volts	110	72.9%
2-2.9 volts	26	17.2%
3-4.4 volts	15	9.9%

Final results of the mobile scan confirmed 170 energized objects with over 88% reading below 4.5 volts. All stray voltage findings greater than or equal to 1 volt and less than 4.5 volts were immediately safeguarded and all finding greater or equal to 4.5 volts were immediately made safe to the public.

Mobile Testing Historical Summary

Historical detections and costs incurred from the Mobile Testing efforts are listed below along with a cost comparison for performing manual stray voltage testing in the same areas.

Test Year	Total Number of Detections	Mobile Program Costs	Manual Program Costs
2014	170	$133,752	$97,880
2013	239	$117,984	$97,880
2012	113	$46,897	$97,567
2011	365	$80,000	$129,000
2010	40	$93,000	$129,000
2009	161	$520,000	$135,000

Observations

The observations this year as well as historically convey that the vast majority of findings are detected on Streetlights. All Streetlights with reported findings from this year's scan are owned by either Monroe County or the City of Rochester. Both Municipalities have been notified of all findings on their streetlights and traffic signal equipment, and of their responsibility for follow-up mitigation and repair.

A detailed summary of energized objects found during the mobile testing effort can be viewed in Appendix 2(a) of this report.

Appendix 1 Stray Voltage Testing Summary

Testing Summary	Total System Units Requiring Testing	Units Completed	Percent Completed	Units with Voltage Found (>= 1.0v)	Percent of Units Tested with Voltage (>= 1.0v)	Units Classified as Inaccessible
Distribution Facilities	32,652	32,652	100%	2	0.006%	69
Underground Facilities	25,203	25,203	100%	8	0.032%	190
Street Lights / Traffic Signals	23,539	23,539	100%	173	0.735%	15
Substation Fences	34	34	100%	0	0%	0
Overhead Transmission	2,395	2,395	100%	12	0.501%	30
TOTAL	83,823	83,823	100%	195	0.233%	304

Appendix 2 Summary of Energized Objects

	Initial Readings				Readings after Mitigation		
	1-4.4V	4.5-24.9V	>25V	Totals	< 1V	1-4.4V	>4.5V
Distribution Facilities	2	0	0	**2**	2	0	0
Pole				0			
Ground				0			
Guy	2	0	0	2	2	0	0
Riser				0			
Other				0			
Underground Facilities	4	4	0	**8**	7	0	0
Manhole/ Pull box				0			
Manhole	3	0	0	3	3	0	0
Padmount Switchgear				0			
Padmount Transformer				0			
Vault-Cover/Door				0			
Pedestal				0			
Other	1	4	0	5	4	0	0
Street Lights/Traffic Signals	150	21	2	**173**	152	0	0
Metal Street Light Pole	117	15	1	133	123	0	0
Traffic Signal Pole	25	5	1	31	27	0	0
Pedestrian Crossing Pole	0	0	0	0			
Traffic Control Box	2	0	0	2	0	0	0
Other	6	1	0	7	2	0	0
Substation Fences	0	0	0	**0**	0	0	0
Fence				0			
Other				0			
Transmission (Total)	7	5	0	**12**	0	7	5
Lattice Tower				0			
Pole				0			
Ground	5	2	0	7	0	7	5
Guy	2	3	0	5			
Other				0			
Miscellaneous Facilities	8	3	1	**12**	6	3	0
Sidewalk	0	1	0	1	1	0	0
Gate/Fence/Awning	3	2	0	5	2	2	0
Control Box				0			
Scaffolding				0			
Bus Shelter				0			
Fire Hydrant				0			
Phone Booth				0			
Water Pipe/Cap	1	0	0	1	0	0	0
Riser				0			
Other	4	0	1	5	3	1	0

Appendix 2(a) Summary of Energized Objects (Mobile Program)

	Initial Readings				Readings after Mitigation		
	1- 4.4V	4.5- 24.9V	>25V	Totals	< 1V	1- 4.4V	>4.5V
Distribution Facilities	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Pole				0			
Ground				0			
Guy				0			
Riser				0			
Other				0			
Underground Facilities	**4**	**4**	**0**	**8**	**7**	**0**	**0**
Handhole	1	4	0	5	4	0	0
Manhole	3	0	0	3	3	0	0
Padmount Switchgear				0			
Padmount Transformer				0			
Vault-Cover/Door				0			
Pedestal				0			
Other				0			
Street Lights/Traffic Signals	**139**	**10**	**1**	**150**	**137**	**0**	**0**
Metal Street Light Pole	107	5	0	112	110	0	0
Traffic Signal Pole	25	4	1	30	26	0	0
Pedestrian Crossing Pole				0			
Traffic Control Box	2	0	0	2	0	0	0
Other	5	1	0	6	1	0	0
Substation Fences	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Fence				0			
Other				0			
Transmission (Total)	**0**	**0**	**0**	**0**	**0**	**0**	**0**
Lattice Tower				0			
Pole				0			
Ground				0			
Guy				0			
Other				0			
Miscellaneous Facilities	**8**	**3**	**1**	**12**	**6**	**3**	**0**
Sidewalk	0	1	0	1	1	0	0
Gate/Fence/Awning	3	2	0	5	2	2	0
Control Box				0			
Scaffolding				0			
Bus Shelter				0			
Fire Hydrant				0			
Phone Booth				0			
Water Pipe (Cap)	1	0	0	1	0	0	0
Riser				0			
Other	4	0	1	5	3	1	0

Appendix 3 Summary of Shock Reports from the Public

	Data collected as of December 31, 2014	Yearly Total
I.	**Total Shock Calls Received:**	**5**
	Unsubstantiated	**1**
	Normally Energized Equipment	**1**
	Stray Voltage:	**3**
	Person	3
	Animal	0
II.	**Injuries Sustained/Medical Attention Received:**	**4**
	Person	4
	Animal	0
III.	**Stray Voltage Source:**	**3**
	Utility Responsibility (Total)	**2**
	Overhead Distribution System	2
	Underground Distribution System	0
	Transmission System	0
	Other Utility/Gov't Agency (Total)	**0**
	Streetlight	0
	Other (Total)	0
	Customer Responsibility (Total)	**1**
IV.	**Stray Voltage Range:**	**3**
	1.0V to 4.4V	0
	4.5V to 24.9V	0
	25V and above	1
	Unknown	2

Appendix 4

Rochester Gas and Electric

As of December 31, 2014

Annual Summary of Deficiencies and Repair Activity Resulting from the Inspection Process

Detail of Deficiences by Facilities	2010				2011				2012				2013				2014			
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**	**IV**	**Within 1 week**	**Within 1 year**	**Within 3 years**	**IV**	**Within 1 week**	**Within 1 year**	**Within 3 years**	**IV**	**Within 1 week**	**Within 1 year**	**Within 3 years**	**IV**	**Within 1 week**	**Within 1 year**	**Within 3 years**	**IV**
Overhead Facilities																				
Repaired in Time Frame	20	206	151	7	35	192	101	0	15	189	888	45	30	323	477	73	26	128	625	81
Repaired - Overdue	1	10	1	0	2	8	0	0	1	0	0	0	5	129	0	0	0	0	0	0
Not Repaired - Not Due	0	0	0	68	0	0	0	173	0	0	173	2,617	0	1	456	2,359	0	410	304	2,374
Not Repaired - Overdue	0	0	0	0	0	0	2	0	0	0	0	0	0	209	0	0	0	0	0	0
Total Overhead Facilities	**21**	**216**	**152**	**75**	**37**	**200**	**103**	**173**	**16**	**189**	**1,061**	**2,662**	**35**	**662**	**933**	**2,432**	**26**	**538**	**929**	**2,455**
Underground Facilities																				
Repaired in Time Frame	5	24	17	1	7	31	44	0	2	49	30	0	1	10	44	17	2	10	3	0
Repaired - Overdue	0	6	4	0	2	9	2	0	1	10	0	0	0	4	0	0	1	0	0	0
Not Repaired - Not Due	0	0	0	76	0	0	0	4	0	0	1	6	0	0	23	7	0	75	53	14
Not Repaired - Overdue	0	0	7	0	0	4	4	0	0	16	0	0	0	4	0	0	0	0	0	0
Total Underground Facilities	**5**	**30**	**28**	**77**	**9**	**44**	**50**	**4**	**3**	**75**	**31**	**6**	**1**	**18**	**67**	**24**	**3**	**85**	**56**	**14**
Pad Mount Facilities																				
Repaired in Time Frame	1	110	104	4	1	99	37	0	4	17	120	10	11	11	15	2	15	2	10	0
Repaired - Overdue	4	71	4	0	3	31	6	0	2	2	0	0	2	1	0	0	11	0	0	0
Not Repaired - Not Due	0	0	0	580	0	0	0	65	0	0	63	211	0	0	5	31	0	8	16	11
Not Repaired - Overdue	0	0	4	0	0	0	9	0	0	3	0	0	0	0	0	0	0	0	0	0
Total Pad Mount Facilities	**5**	**181**	**112**	**584**	**4**	**130**	**52**	**65**	**6**	**22**	**183**	**221**	**13**	**12**	**20**	**33**	**26**	**10**	**26**	**11**
Streetlight Facilities																				
Repaired in Time Frame	0	0	1	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0
Repaired - Overdue	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Not Repaired - Not Due	0	0	0	8	0	0	0	0	0	0	0	0	0	0	0	7	0	0	0	27
Not Repaired - Overdue	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Streetlight Facilities	**-**	**-**	**1**	**8**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**1**	**7**	**-**	**-**	**-**	**27**
Transmission Facilities																				
Repaired in Time Frame	0	10	63	6	0	32	43	0	0	15	22	0	0	3	36	0	0	1	88	0
Repaired - Overdue	0	4	2	0	0	0	0	0	0	0	0	0	0	4	0	0	0	0	0	0
Not Repaired - Not Due	0	0	0	3	0	0	0	50	0	0	20	128	0	0	63	5	0	8	230	95
Not Repaired - Overdue	0	0	0	0	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Transmission Facilities	**-**	**14**	**65**	**9**	**-**	**32**	**45**	**50**	**-**	**15**	**42**	**128**	**-**	**7**	**99**	**5**	**-**	**9**	**318**	**95**

Appendix 4

Summary of Deficiencies and Repair Activity Resulting from the Inspection Process

Year	Priority Level / Repair Expected		Deficiencies Found (Total)	Repaired In Time Frame	Repaired - Overdue	Not Repaired - Not Due	Not Repaired - Overdue
2010							
	I	Within 1 week	**31**	26	5	0	0
	II	Within 1 year	**441**	350	91	0	0
	III	Within 3 years	**358**	336	11	0	11
	IV	N/A	**753**	18	n/a	735	n/a
2011							
	I	Within 1 week	**50**	43	7	0	0
	II	Within 1 year	**406**	354	48	0	4
	III	Within 3 years	**250**	225	8	0	17
	IV	N/A	**292**	0	n/a	292	n/a
2012							
	I	Within 1 week	**25**	21	4	0	0
	II	Within 1 year	**301**	270	12	0	19
	III	Within 3 years	**1,317**	1,060	0	257	0
	IV	N/A	**3,017**	55	n/a	2,962	n/a
2013							
	I	Within 1 week	**49**	42	7	0	0
	II	Within 1 year	**699**	347	138	1	213
	III	Within 3 years	**1,120**	573	0	547	0
	IV	N/A	**2,501**	92	n/a	2,409	n/a
2014							
	I	Within 1 week	**55**	43	12	0	0
	II	Within 1 year	**642**	141	0	501	0
	III	Within 3 years	**1,329**	726	0	603	0
	IV	N/A	**2,602**	81	n/a	2,521	n/a

CERTIFICATION
[FACILITY INSPECTIONS]

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

Franklyn D. Reynolds, on this 6th day of February 2015, certifies as follows:

1. I am the Vice President, Asset Management and Planning of Rochester Gas and Electric (the "Company"), and in that capacity I make this Certification for the annual period ending December 31st, 2014 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, December 15, 2008, March 22, 2013 and January 13, 2015 in Case 04-M-0159 and July 21, 2010 and June 23, 2011 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, 2014 (the "Twelve-Month Period").

4. I hereby certify that the utility has exercised due diligence in carrying out a plan designed to meet the inspection requirements, including quality assurance, and, to the best of my knowledge, the utility has inspected the requisite number of electric facilities. In addition, the utility has inspected all of its electric facilities during the previous five year period, except those identified in the Annual Report.

Franklyn D. Reynolds

Sworn to before me this 19 day of February, 2015

Notary Public:

ANNA M. SABERS
Notary Public, State of New York
No. 01SA6072560
Qualified in Monroe County
Commission Expires April 08, 2018

Exhibit 1

CERTIFICATION
[STRAY VOLTAGE TESTING]

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

Franklyn D. Reynolds on this 6th day of February, 2015 certifies as follows:

1. I am the Vice President, Asset Management and Planning of Rochester Gas and Electric (the "Company"), and in that capacity I make this Certification for the annual period ending December 31st, 2014 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, December 15, 2008, March 22, 2013 and January 13, 2015 in Case 04-M-0159 and July 21, 2010 and June 23, 2011 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, 2014 (the "Twelve-Month Period").

4. I hereby certify that the Company exercised due diligence in carrying out a plan designed to meet the stray voltage testing requirements, including quality assurance, and, to the best of my knowledge, the Company has tested all of its publically accessible electric facilities and streetlights, except those identified in the Annual Report. 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.

Franklyn D. Reynolds

Sworn to before me this 6th day of February , 2015

Notary Public:

ANNA M. SABERS
Notary Public, State of New York
No. 01SA6072590
Qualified in Monroe County
Commission Expires April 06, 2018