

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

CASE 25-G-0147 - In the Matter of Staff's Analysis of Local
Distribution Company (LDC) Performance
Related to the Pipeline Safety Measures.

2024 PIPELINE SAFETY
PERFORMANCE MEASURES REPORT

Office of Energy System Planning and Performance
Pipeline Safety Section
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Executive Summary

The pipeline safety performance measures that make up this report were the result of collaborative efforts beginning in the 1990s between New York's 11 major gas local distribution companies (LDCs) and the New York State Department of Public Service (DPS). Revised in 2017, these measures improve identification and tracking in areas that are critical to pipeline safety. Most of the data used in the report was gathered and submitted by the LDCs using processes developed from these collaborative efforts.

This report examines the LDCs' performance in specific safety areas that include damage prevention, emergency response, and leak management for calendar year 2024, as well as the results of DPS Staff's (Staff) audits and investigations that verify compliance with the minimum pipeline safety regulations for calendar year 2023. The Pipeline Safety Section of the Office of Energy System Planning and Performance has been producing this report since 2004.

In 2024 the data shows a decrease in the damage prevention measure by 0.4% in the number of one-call tickets, decreasing from 765,858 to 762,521 (or 3,337 less tickets), and a decrease of 97 damages from 1,326 to 1,229, as compared to 2023. This resulted in an improved performance for total damages, going from a rate of 1.73 per 1,000 one-call tickets in 2023 to a rate of 1.61 per 1,000 one-call tickets in 2024. For the emergency response measure, the total 30-minute, 45-minute, and 60-minute emergency response time performances declined slightly all within a 1.6% range. For the leak management measure, the total year-end leak backlog improved 38.7% from the previous calendar year, going from 6,149 in 2023 to 3,767 in 2024. The total number of leaks discovered decreased from 12,789 in 2023 to 11,449 in 2024, or 1,340 less leaks. The

number of leak repairs decreased from 15,169 in 2023 to 14,920 in 2024, or 249 less leaks repaired. Due to the increase in the number of miles of leak prone pipe removed each year since 2015, with pipe materials that are less prone to leak, the LDCs have experienced a trending decrease in the number of both leaks discovered and repaired. In 2023, Staff identified a total of 909 instances of non-compliance with the Public Service Commission's (Commission) pipeline safety regulations across all 11 of the major LDCs' operating service territories. This accounts for 2.74% of the total number of records Staff reviewed, and 0.13% of the total number of records available for review. In other words, 97.26% of the total number of records reviewed were compliant with the Commission's minimum pipeline safety regulations.

Overall, the data indicates that performance has substantially improved for LDCs across the State over the 22-year period Staff has been reporting performance to the Commission. It is important to note that the LDCs maintained focus on these performance measures, which ensured the same, if not a greater, level of public safety. As LDCs continue their outreach and education efforts to excavator communities as well as the public, adopt better practices in responding to leak, odor, and emergency reports, work to remove leak-prone infrastructure, and as quality assurance and quality control programs continue to mature, Staff expects further performance improvements will occur. A high-level discussion of the results for each performance measure follows below.

The first measure, damage prevention, gauges the LDCs' achievement in minimizing damages to buried gas facilities caused by excavation or demolition activities. The damage prevention measure is broken down into four categories: damages due to (1) mismarks, or the inaccurate marking by the LDC of its

affected underground facilities; (2) errors by the LDC and/or its contractors; (3) third-party excavator error; and (4) no-calls, or failure of an excavator to provide notice of intent to excavate to the one-call notification system. Two of the four measures showed improvements as follows: third-party damages decreased, from 0.92 damages per 1,000 one-call notifications in 2023 to 0.83 in 2024 (9.8%); and no-call damages decreased, from 0.36 in 2023, to 0.31 in 2024 (13.9%). One of the four measures showed no change: mismark damages remained at 0.39 damages per 1,000 one-call tickets. However, the LDCs' performance in the final category experienced declined. Damages by an LDC and/or its contractors increased from 0.06 damages per 1,000 one-call tickets in 2023, to 0.09 in 2024 (a 50% increase). Each one-call ticket is a request for mark-outs of the affected underground facility prior to the commencement of excavation.

The second measure, emergency response, reflects the LDCs' ability to respond promptly to reports of leak, odor, and emergency notifications by examining the percentage of reports that LDCs responded to within three response time intervals. The first criterion is for an LDC to respond to 75% of emergency reports within 30 minutes; the second, respond to 90% of emergency reports within 45 minutes; and the third, respond to 95% of emergency reports within 60 minutes.

In 2024, the LDCs' total performance declined slightly for each of the emergency response time intervals compared to 2023, although performance in each interval far exceeded the established minimum percentages. In general, the LDCs have continued to use technologies such as global position systems, or GPS, to quickly identify the most appropriate employee to respond to leak, odor, or emergency reports, and have continued placing, or adding, personnel in certain geographical areas during times of day that have historically high volumes of

emergency notifications. In addition, the Commission has continued to incorporate incentives, in the form of positive revenue adjustments, within the LDCs' respective rate proceedings to encourage further improvements.

The third measure, leak management, examines LDCs' performances related to their leak inventories, in addition to the evaluation of leaks discovered and leaks repaired. Potentially hazardous leaks include any leak that requires repair pursuant to Title 16 of New York Codes Rules and Regulations (16 NYCRR) §255.811 (Type 1), §255.813 (Type 2A), and §255.815 (Type 2). Type 3 leaks (16 NYCRR §255.817), which do not currently have a prescribed repair timeframe, are, by definition, considered to be non-hazardous. Pursuant to 16 NYCRR §255.817(c), Type 3 leaks require reevaluation during the next required leakage survey or annually, whichever is sooner, to ensure that a public safety concern has not developed. While Type 3 leaks are not expected to become a safety concern, LDCs continue to eliminate these leaks on their systems because it reduces lost gas, maintenance costs, the total number of emergency reports, methane emissions, and any potential dampening effect the persistent odor may have on the public and public awareness efforts.

For leaks requiring repair, the end of the calendar year generally coincides with the beginning of the frost season. During this timeframe, there is a greater chance of gas migration into a building because the gas cannot vent as readily through the soil to the atmosphere due to the impermeable blanket of frost. In general, all LDCs have demonstrated improvement in these measures over the past several years. The total year-end leak backlog improved by 38.8% from the previous calendar year, a reduction of 2,384 leaks (reduced from a backlog of 6,149 leaks in 2023 to 3,765 leaks in 2024). The

repairable year-end leak backlog improved by 6.7%, or two leaks, decreasing from 30 leaks in 2023 to 28 leaks in 2024. The total number of leaks discovered decreased by 10.5% or 1,340 leaks, from 12,789 leaks in 2023 to 11,449 leaks in 2024.

Additionally, the total number of leaks repaired decreased by 1.6% or 249 leaks, from 15,169 in 2023 to 14,920 in 2024. As indicated above, this shows the positive effect leak prone pipe removals have had on reducing leaks on the LDCs' gas systems.

For the fourth measure, Staff identification of instances of LDC non-compliance with applicable regulations through annual audit activity, Staff evaluates LDCs on their compliance with the Commission's minimum pipeline safety regulations. Each year, Staff conducts statistically based audits and investigations of the LDCs to determine their respective compliance with gas safety regulations. Each instance of non-compliance identified by Staff represents an area where an LDC failed to meet these minimum requirements as prescribed.

The data reported varies greatly from year to year, which is due, in part, to Staff's audit cycle. Staff conducts these audits and investigations of the pipeline safety regulations on varying frequencies determined by the risk each individual regulation poses to public safety. Staff identifies the regulations as high risk, which Staff audits annually, or as other risk, which Staff evaluates not less than once every five years.¹ Additionally, because of the timing of Staff's audits and required LDC responses to the audits, this measure reflects performance during calendar year 2023, as opposed to the other measures, which examine performance during calendar year 2024.

¹ Staff may evaluate compliance with other risk regulations more frequently, such as once every two, three, or four years.

In 2023, Staff identified instances of non-compliance by all 11 of the major LDCs. A review of the number of instances of non-compliance by LDCs in 2023 compared to 2022 showed that the number of instances increased for three of the LDCs, while the other eight LDCs experienced decreases. For those LDCs that showed an increase in the number of instances of non-compliance in 2023, the LDCs primarily attributed the increases to problems experienced during the transition from paper to electronic records, inspections that were not completed due to access-related issues, and LDCs' misunderstanding or misinterpretation of the safety regulations regarding the following: high pressure piping notifications, leakage surveys, active corrosion monitoring, valve maintenance, general provisions, warning tags, relief valve annual inspections, external corrosion control, and inactive service lines. After Staff identified and raised these issues with the LDCs, the LDCs have developed and implemented plans including, but not limited to, retraining their employees, and revising documentation used to record inspections so that all required steps are prescribed.

Regardless of the efforts made thus far, the goal for each LDC should remain the complete elimination of all instances of non-compliance with pipeline safety regulations.

Introduction

The pipeline safety performance measures provide a means of evaluating LDC performance in areas presenting higher safety risks to life, property, and the environment. These performance measures are tools Staff uses to gauge whether New York LDCs sustain and improve their safe, adequate, and reliable operation and maintenance of gas distribution and transmission systems. These measures show how LDCs are performing in a given year, as well as their performance trends over time.

In developing the performance measures, Staff first identified areas in the LDCs' systems or operations that carry greater potential for harm to the public if performance is sub-standard. Staff then developed methods for recording and tracking data for use as a practical management tool. This process resulted in identifying four performance measures: damage prevention, which examines damage to the LDCs' buried facilities resulting from excavator activities; emergency response, which examines the amount of time that it takes an LDC to reach the site of a reported gas leak, odor, or emergency notification; leak management, which examines LDC performance in reducing and managing leak inventory levels at year-end, and the evaluation of leaks discovered, and leaks repaired, in total, and per each LDC's respective system mileage; and non-compliances with the Commission's Pipeline Safety Regulations, which is discussed in more detail below.

On August 15, 2013, the Commission issued a request for proposals for an independent consultant to perform a focused operational audit of the performance measure data as submitted by nine of the 11 LDCs discussed in this report.² The audit assessed the completeness and accuracy of the performance measure data submitted by LDCs and comparability amongst LDCs.

On April 20, 2016, the Commission issued an Order releasing the audit report and provided guidance on LDCs' responses to the recommendations.³ The LDCs submitted implementation plans to address each recommendation in the audit

² Case 13-M-0314, Central Hudson Gas & Electric Corporation, et al. - Operational Audit, Letters to LDCs (issued August 15, 2013).

³ Case 13-M-0314, supra, Order Releasing Report and Providing Guidance on Response (issued April 20, 2016).

report by May 20, 2016. In general, the consultant reported that the LDCs complied with the intent of these performance measures and, for the most part, accurately reported their respective data. Some of the consultant's recommendations focused on the LDCs' lack of written policies and procedures to address and collect data, instances where the methodology used to calculate the data has varied, and minor inconsistencies amongst LDCs in the compilation of their respective data.

On March 10, 2017, the Commission issued an Order approving the implementation plans submitted by the LDCs and directed the LDCs to implement those plans.⁴ As a result of the LDCs' implementation of those plans since 2017, the data contained in the reports should be more consistent across each LDC than prior reports.

For the compliance measure, Staff evaluates LDCs on their compliance with the Commission's minimum pipeline safety regulations. This measure looks at non-compliance issues as identified by Staff during audits and investigations of the LDC. Each year, Staff conducts audits and investigations of the LDCs to determine their respective compliance with the gas safety regulations. Each instance of non-compliance identified represents an area in which an LDC failed to meet the prescribed minimum requirements found in these regulations.

Non-compliance with pipeline safety regulations could cause or contribute to a major incident. For this reason, it is important these audit findings are publicly transparent and continue to track performance, as well as reoccurring non-compliances, over time. As a further incentive to improve and maintain compliance with the minimum pipeline safety

⁴ Case 13-M-0314, supra, Order Approving Implementation Plans (issued March 10, 2017).

regulations, the Commission has instituted negative revenue adjustments through rate plans for instances of non-compliance by the 11 major LDCs.

While all gas corporations are subject to the Commission's pipeline safety regulations, this report only examines the performance of the 11 largest LDCs, which includes over 99% of the customers in the State. These are Central Hudson Gas and Electric Corporation (Central Hudson); Consolidated Edison Company of New York, Inc. (Con Edison); Corning Natural Gas Corporation (Corning); KeySpan Gas East Corporation d/b/a National Grid (NGrid LI); Liberty Utilities (St. Lawrence Gas) Corp. (Liberty); National Fuel Gas Distribution Corporation (NFG); Niagara Mohawk Power Corporation, d/b/a National Grid (NGrid Upstate); New York State Electric & Gas Corporation (NYSEG); Orange and Rockland Utilities, Inc. (O&R), Rochester Gas and Electric Corporation (RG&E); and The Brooklyn Union Gas Company d/b/a National Grid NY (NGrid NY).

Performance and Analysis

Throughout this report, except for the compliance measure, the figures display LDCs' performance in calendar years 2020 through 2024.⁵ For the compliance measure, the figures display the LDCs' performance in calendar years 2019 through 2024, based on the timing of when Staff completed the underlying audits. The grey columns in the graphs represent the prior four years, and the black column represents the most recent year's performance. The blue lines on the graphs represent the

⁵ Historical calendar year data and associated case numbers can be found in Appendix A of this report.

combined LDC performance levels for the specifically identified measure.

Damage Prevention

Damage to underground gas facilities due to excavation activity is one of the leading causes of gas pipeline failures and accidents, both statewide and nationally. The Common Ground Alliance (CGA) stated that in 2019, excavation-related damages to utilities cost the United States approximately \$30 billion. According to the CGA's most recent annual report, in 2023, telecommunications (47%), gas (40%), electric (8%), and water and sewer (5%) were the most frequently damaged utilities within the United States. In 2023, there were a total of 42,343,097 one-call tickets requested within the United States. With tickets pertaining to the facilities of the 11 LDCs in New York State contributing a total of 765,858 one-call tickets, this accounts for 1.81% of the total number of tickets within the United States.

The general damage prevention process is as follows:

(1) an excavator provides notice of its intent to excavate to a one-call notification system at least two full working days, not counting New York State publicly observed holidays and weekends prior to beginning any excavation;⁶ (2) the one-call notification system transmits an excavation notice (one-call ticket or ticket) to the member operators whose facilities may be affected by that excavation activity; (3) the affected operators clearly and accurately mark the location of its buried facilities in or

⁶ New York State has two one-call notification systems, one for New York City and Long Island, New York 811, Inc., and the second for the remainder of the State, UDig NY (formerly known as Dig Safely New York).

within 15-feet of the excavation area; (4) an excavator confirms that each utility operator has either marked its facilities or cleared the ticket as no utilities are located within the work site; (5) an excavator preserves the utility markings, either paint, flags, or both, until no longer required for safe excavation; and (6) an excavator works carefully around the marked facilities to avoid damages. Damage to an underground facility can be categorized by identifying where in this process the root cause of the incident lies.

Evaluating the number of damages in relation to the volume of construction and excavation activity in an LDC's respective service territory provides a useful basis in assessing performance. The data used in these analyses are contained in Appendices B and C. The method used to normalize each LDC's data is the number of damages per 1,000 one-call tickets received by that LDC in a given year. As previously mentioned, inconsistencies were identified through the operational audit issued in 2016 and addressed through implementation plans approved in 2017. Thus, the data represented in this year's report may vary by LDC when compared to performance measure reports issued prior to 2017. However, the numbers should be more accurate.

Staff categorizes the numbers of damages as damages resulting from mismarks, third-party excavator error, LDC employees and its contractors, or no-calls. Each ticket received provides an LDC with the opportunity to mark its affected facilities accurately. Hence, for damages due to mismarks, the report examines the number of damages caused by mismarks per 1,000 tickets received for each LDC.

Once an excavator requests a one-call ticket by either calling the toll-free telephone number, 811, or using the UDig NY or New York 811, Inc. websites, and the facilities marked,

the excavator can, if working carefully, avoid damage to underground facilities. Third-party excavator error damages are historically the largest component of total damages, primarily because of the need to educate third-party contractors in safe excavation and best practices. Most large excavators are aware of the existence of the one-call systems and their requirement to provide notification. Many excavators, especially small excavators, are not as well-versed in the additional requirements such as respecting tolerance zones, verifying locations of underground facilities by means of hand-dug test holes, notifying underground facility operators of unverifiable marked facilities, maintaining the markings, maintaining four inches of clearance between powered equipment and the verified facility, and the need to request a one-call ticket for work being performed on private property. Educating excavators on how to avoid underground facility damage once they have requested mark-outs requires more in-depth outreach and training, particularly given seasonal employees and their turnover year to year. The Commission cannot order such training for non-utility excavator personnel; however it does enforce excavator compliance with the one-call requirements and can impose penalties for violations.⁷ This is one of the reasons why, through its enforcement process, the Commission considers and encourages excavators to complete the training provided by the one-call systems.

Damages caused by LDCs' personnel or by their own contractors are included in the damage analysis as a separate category. Because of robust damage prevention programs and operator qualification requirements for LDCs, the LDCs'

⁷ General Business Law (GBL) §765, Public Service Law (PSL) §119-b, and 16 NYCRR Part 753.

personnel and contractors should have sufficient training, knowledge, qualifications, and experience to work carefully near the LDC's facilities. LDCs should also have better control over the contractors they hire to perform work than they have over unaffiliated excavators. Thus, this category should be the smallest contributor to the total damage performance and, in theory, the easiest for an LDC to improve. The current measure tracks underground damages caused by all utility operations within an LDC's operating service territory. That is, for an electric and gas combination utility, damages to gas facilities caused by electric crews or electric company contractors are combined.

Damages due to no-calls are instances where an excavator failed to provide notice of its intent to excavate to either of the two one-call notification systems located in New York State. This measure provides an indication of the general level of awareness excavators have about the one-call notification systems. A high percentage of damage in this category indicates that additional and more effective outreach efforts are needed by the LDC to make excavators aware of the dangers of working around buried facilities and the importance of using the one-call notification systems.

The 11 major gas LDCs reported a total of 1,229 underground damages in 2024. For the previous 10 years, the average number of total damages has been 1,465, with a standard deviation of 153. This consistency with the standard deviation in the number of total damages could demonstrate that any improvements or declines have primarily been driven by the number of one-call tickets. In 2024, the data shows a decrease of 0.44% in the number of one-call tickets, going from 765,858 to 762,521 (or 3,337 less tickets), and a decrease of 97 damages, from 1,326 to 1,229 as compared to 2023. This resulted

in an improved performance for total damages, going from a rate of 1.73 per 1,000 one-call tickets in 2023 to a rate of 1.61 per 1,000 one-call ticket in 2024.

Staff supports the LDCs' and excavators' efforts to eliminate damages by enforcing the Commission's damage prevention requirements prescribed within GBL §765, PSL §119-b, and 16 NYCRR Part 753. Over the past five years, Staff issued 1,502 citations, which led to 235 training sessions completed by excavators with either New York 811, Inc. or UDig NY as part of the Commission's enforcement process. Additionally, approximately \$3,434,488 in penalties have been collected for this same period.

In order to attempt to quantify the total amount of gas loss due to avoidable pipeline damage, starting in September 2023, Staff began collecting and calculating gas emissions estimates from pipeline damage incidents. Reported at Commission Sessions from September 2023 through December 2023, Staff estimated 10,269,218 cubic feet of combined gas lost to the atmosphere. Based on conservative usage assumption, this is enough gas to provide heat to 102.7 residential consumers for a year. Reported at Commission Sessions from January 2024 through December 2024, Staff estimated 178,690,991 cubic feet of combined gas lost to the atmosphere which was enough to provide heat to 1,786.9 residential consumers for a year.

Figure 1 below displays the collective performance regarding the damage prevention measures.

Damage Prevention	2020	2021	2022	2023	2024
Number of Tickets	765,498	808,652	797,613	765,858	762,521
Mismarks	0.42	0.38	0.40	0.39	0.39
Co. & Co. Contractor Error	0.08	0.08	0.07	0.06	0.09
Excavator Error	0.97	0.79	0.89	0.92	0.83
No-Calls	0.38	0.37	0.34	0.36	0.31
Total Damages (per 1,000)	1.85	1.62	1.70	1.73	1.61

Figure 1 - Collective Damage Prevention Performance

As previously noted, 2024 saw a 0.44% decrease in the number of one-call tickets when compared to 2023.⁸ A review of the number of damages, shows that 2024 had five less mismatch damages, decreasing from 299 to 294, and 33 fewer no-call damages, decreasing from 272 to 239. Additionally, these numbers are well below the five-year averages (2020 through 2024) of 307.6 mismatch damages and 276.6 for no-call damages. The decrease in the number of no-call damages might indicate

⁸ The total damage performance may not equal the sum of the four categories due to rounding.

that the efforts made in educating excavators of the importance, and the need for, using the one-call system to provide notice of intent to excavate to the one-call notification system. For LDCs and their respective contractors, the number of damages increased, going from 49 in 2023 to 66 in 2024. For third-party damages, the number of damages decreased by 10.8% (going from 706 in 2023 to 630 in 2024).

Specific LDC performance for each of the damage prevention categories are located in Appendices B and C. Individual LDC performance for total damages per 1,000 tickets, is displayed in Figure 2 below.

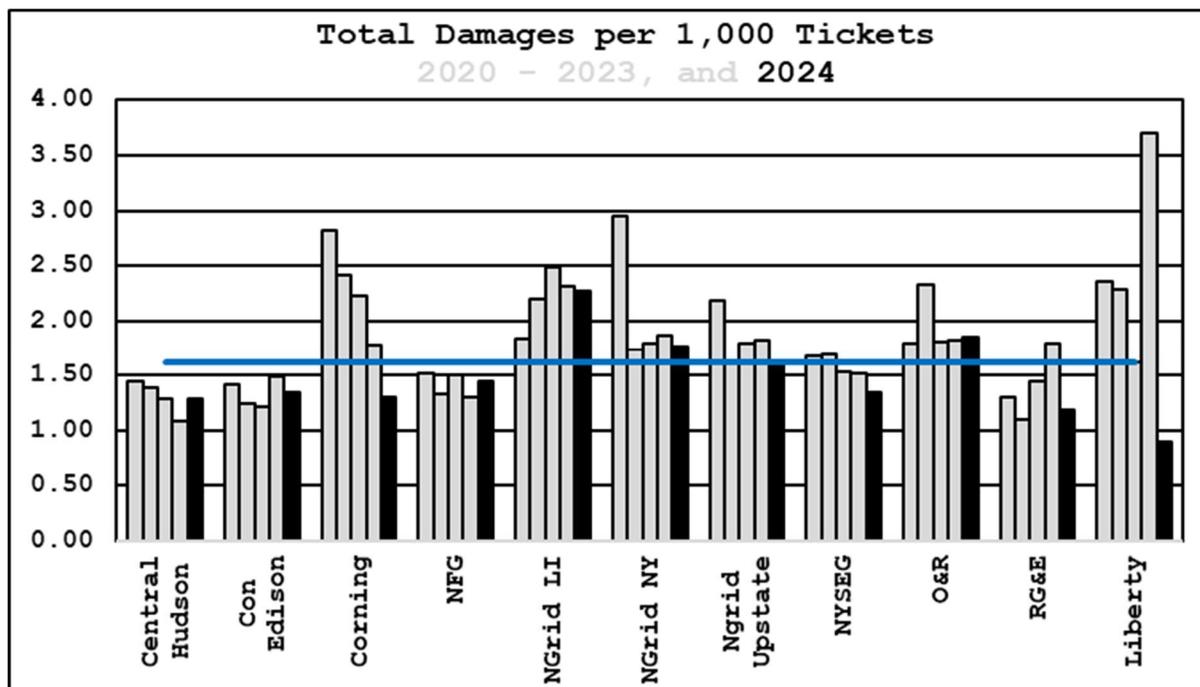


Figure 2 - Total Damages per 1,000 Tickets

As seen in Figure 2, eight LDCs improved, and three LDCs performed worse than the previous year. Specifically, the eight LDCs with improved performance are as follows: Con Edison improved by 9.2%, decreasing from 157 total damages in 2023 to

143 in 2024, despite receiving 296 more tickets; Corning's performance improved by 27%, decreasing from nine total damages in 2023 to six in 2024, while having received 440 fewer tickets; NGrid LI's performance improved by 1.5%, decreasing from 279 total damages in 2023 to 282 in 2024, despite receiving 3,091 more tickets; NGrid NY's performance improved by 5.6%, decreasing from 197 total damages in 2023 to 194 in 2024, despite receiving 4,577 more tickets; NGrid Upstate's performance improved by 13.1%, decreasing from 192 total damages in 2023 to 164 in 2024, while having received 1,839 fewer tickets; NYSEG's performance improved by 11.8%, decreasing from 94 total damages in 2023 to 75 in 2024, while having received 5,917 fewer tickets; R&GE's performance improved by 34%, decreasing from 115 total damages in 2023 to 79 in 2024, despite receiving 2,658 more tickets; and Liberty's performance improved by 75.7%, decreasing from 18 total damages in 2023 to four in 2024, while receiving 411 fewer tickets.

As mentioned above, three LDCs performed worse than the previous year. Those LDCs performed as follows: Central Hudson's performance declined by 18.7%, increasing from 31 total damages in 2023 to 38 in 2024, while having received 930 more tickets; NFG's performance declined by 10.8%, increasing from 164 total damages in 2023 to 171 in 2024, while having received 7,429 fewer tickets; and O&R's performance declined by 1.3%, increasing from 70 total damages in 2023 to 73 damages in 2024, while having received 1,147 more tickets.

LDCs' performance for excavator error damages per 1,000 tickets, is displayed in Figure 3 below.

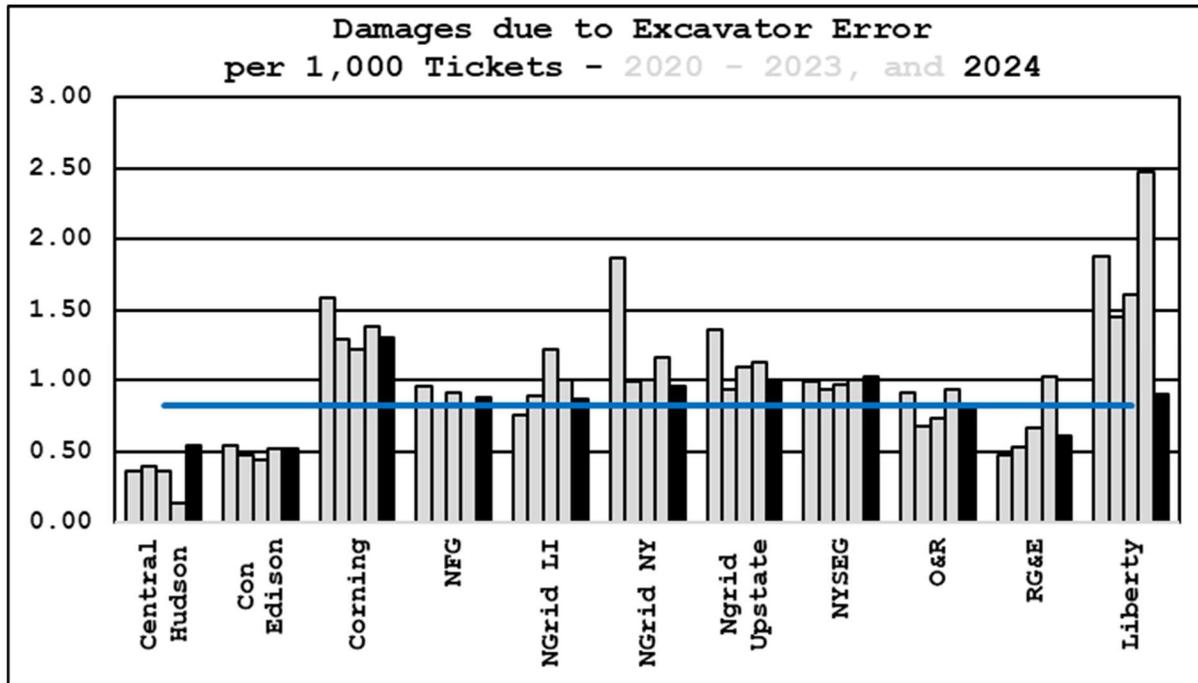


Figure 3 - Excavator Error Damages per 1,000 Tickets

As seen in Figure 3, eight LDCs improved, and three LDCs performed worse than the previous year. Of those improving from 2023 to 2024: Con Edison (0.3%) remained at 55 damages per year; Corning (6.1%) decreased from seven excavator error damages to six; NGrid LI (13%) decreased from 121 to 108; NGrid NY (17.5%) decreased from 122 to 105; NGrid Upstate (12%) decreased from 118 to 102; O&R (13.7%) decreased from 36 to 32; RG&E (40.4%) decreased from 66 to 41; and Liberty (64.6%), decreased from 12 to four.

Of those that performed worse compared to the previous year: Central Hudson showed a decline of 287.4%, increasing from four excavator error damages in 2023 to 16 in 2024; and NFG showed a decline of 7.3%, increasing from 103 excavator error damages in 2023 to 104 in 2024. While NYSEG exhibited a decline in performance of 1.7%, it also showed a decrease in excavator error damages from 62 in 2023 to 57 in 2024.

LDC performance for no-call damages per 1,000 tickets, is displayed in Figure 4 below.

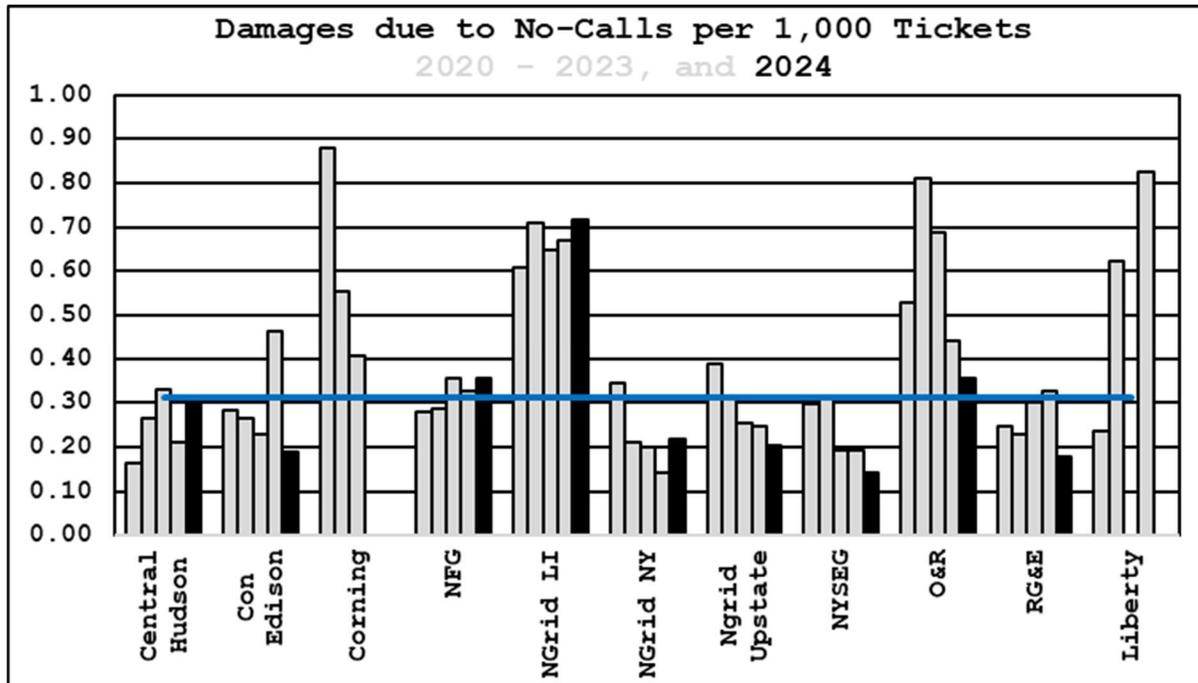


Figure 4 - No-call Damages per 1,000 Tickets

As seen in Figure 4, six LDCs improved, four LDCs performed worse, and one LDC remained the same as previous year. For those improving from 2023 to 2024: Con Edison (59.3%) decreased from 49 no-call damages to 20; NGrid Upstate (17.8%) decreased from 26 to 21; NYSEG (26.3%) decreased from 12 to eight; O&R (20%) decreased from 17 to 14; RG&E (45.1%) decreased from 21 to 12; and Liberty (100%) decreased from four to zero.

As mentioned above, three LDCs performed worse than the previous year. For those with declining performance from 2023 to 2024: Central Hudson (45.3%) increased from six no-call damages to nine; NFG (8.9%) increased from 41 to 42; NGrid LI (7.1%) increased from 81 to 89; and NGrid NY (53.4%) increased

from 15 to 24. Corning's performance remained the same at zero no-call damages for the second year in a row.

Use of the three-digit 811 dialing system, consistent and regular enforcement taken by the Commission for violations of 16 NYCRR Part 753, excavator training, public outreach, education, and training efforts taken by LDCs, and the one-call systems all contributed to raising excavator awareness regarding their obligations to not only participate in the one-call system, but to excavate with due care and safely around underground facilities. To aid in the enforcement of 16 NYCRR Part 753, LDCs voluntarily forward information they collect about excavators who damage underground facilities without having mark-out requests. In a more recent effort, some LDCs have also been voluntarily reporting all damages, regardless of cause or the entity who damaged the facility, allowing Staff to perform more damage investigations in real-time before mark-outs are removed and/or refreshed as part of the repair efforts.

Once notified, Staff evaluates the specifics of each damage, performs on-site interviews and investigations, identifies the root cause or causes of the damage, obtains any pertinent information (such as photographs, measurements, etc.), and pursues enforcement actions where appropriate. This enforcement effort, coupled with increased reporting frequencies and associated penalties, are deterrents to non-compliance. Where appropriate, enforcement cases are resolved by a consent order agreement in which the financial penalty is reduced if the excavator agrees to complete a training session provided by the one-call system covering the area where the damage occurred. The training sessions have led to a decrease in the number of repeat violators. All LDCs are encouraged to continue their efforts in notifying Staff of 16 NYCRR Part 753 incidents as close to the initial damage as possible.

LDC performance for mismatch damages per 1,000 tickets is displayed in Figure 5 below.

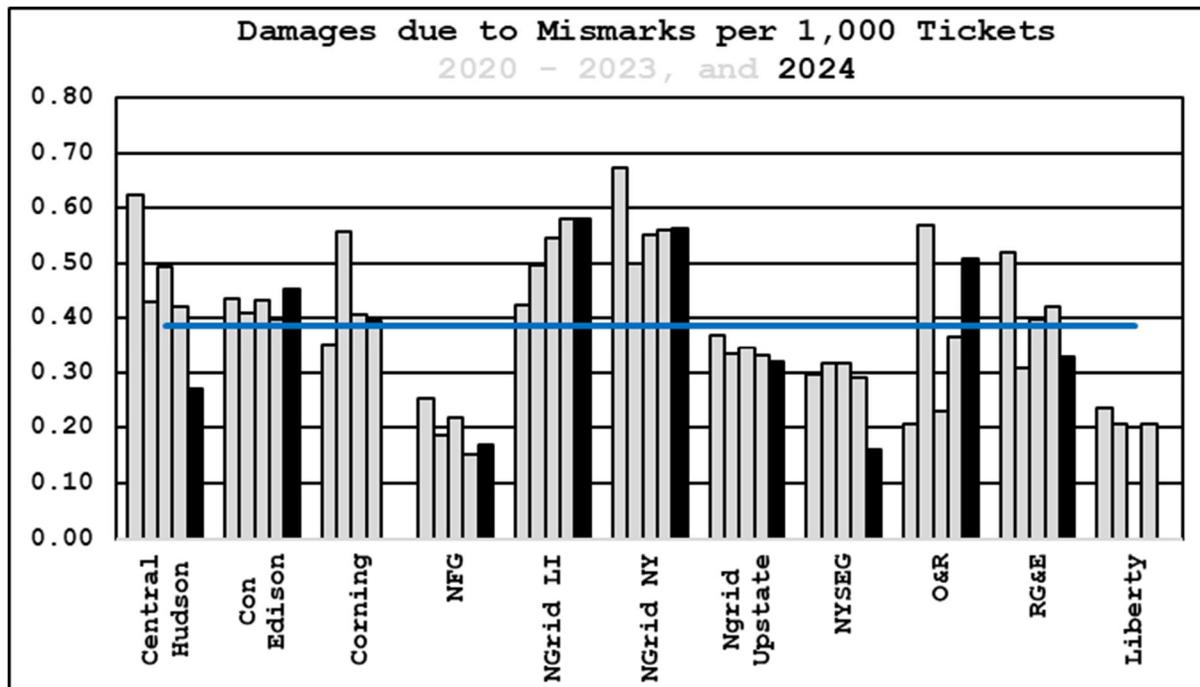


Figure 5 - Mismatch Damages per 1,000 Tickets

As seen in Figure 5, six LDCs improved and five LDCs performed worse than the previous year. For those improving from 2023 to 2024: Central Hudson (35.4%) decreased from 12 mismatch damages to eight; Corning (100%) decreased from two to zero; NGrid Upstate (4%) decreased from 35 to 33; NYSEG (44.7%) decreased from 18 to nine; RG&E (21.8%) decreased from 27 to 22; and Liberty (100%) decreased from one to zero. Overall, the LDCs collectively showed a 1.7% improvement in performance decreasing from 299 mismatch damages in 2023 to 294 in 2024.

Staff typically expects to see general improvements for damages due to mismarks as LDCs continually adopt best practices to locate their facilities. These best practices include removal of older leak-prone pipe, which is more

difficult to accurately identify on facility maps and records than newer pipe, and the development of better controls over the contractors LDCs hire to mark out their facilities. As damages occur, pipeline maps and records are updated to reflect the exact location of the underground piping.

LDC performance for company and company contractor damages per 1,000 tickets is displayed in Figure 6 below.

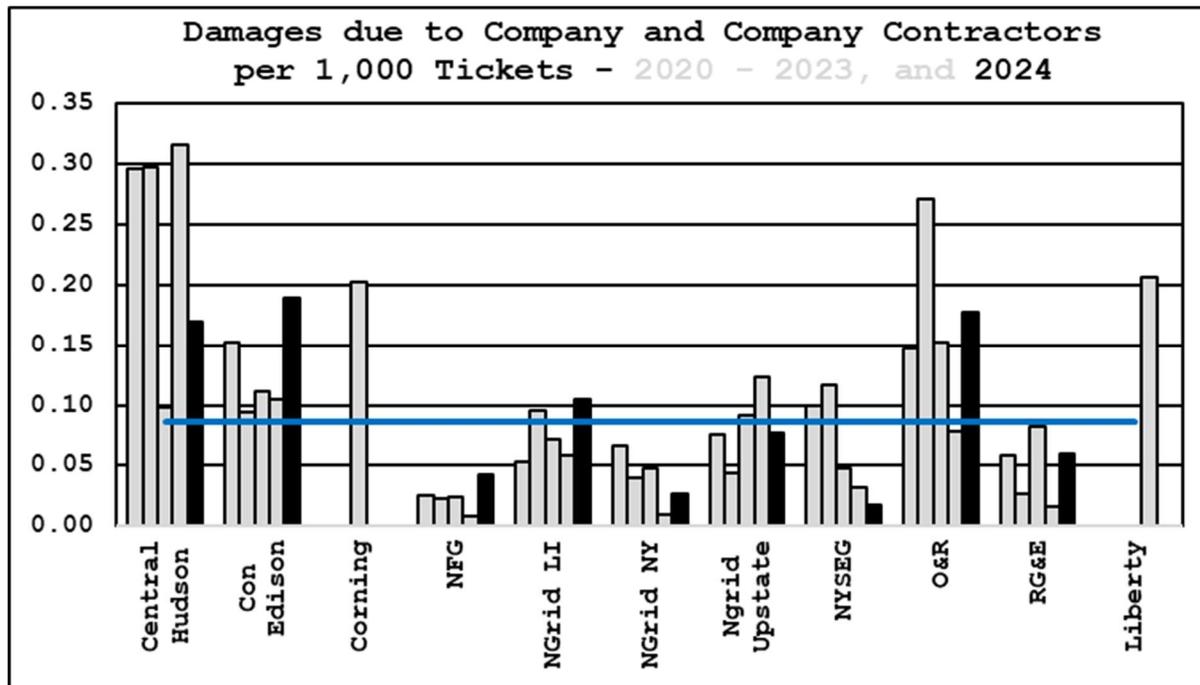


Figure 6 - Damages due to Company and Company Contractors per 1,000 Tickets

As seen in Figure 6, four LDCs improved, six LDCs performed worse, and one LDC remained the same as the previous year. Overall, damages due to an LDC or its contractor increased by 34.7%, going from 49 such damages in 2023 to 66 in 2024. With the Commission’s support and encouragement, the LDCs have continued to proactively remove leak-prone pipe. This leads to more excavation from both the LDCs and their

contractors near and around buried, generally older, gas facilities which, in turn, increases the opportunity for damage.

The LDCs are expected to maintain better control over the contractors they hire to perform work for them than they have over non-affiliated third-party excavators. The LDCs' employees and contractors should have the knowledge, skills, abilities, and qualifications to work carefully near and around underground gas facilities. The LDCs point out that often these damages are to facilities that are in the process of being removed. When a damage occurs, the LDC and its contractors are more prepared than third-party excavators to remedy the situation.

While it is true that damages to facilities can occur while they are being removed, LDCs should not underestimate this category of damages. These damages still have the potential to harm workers, members of the public, and property. Therefore, the LDCs should avoid them. All damages not only pose safety concerns, but also have the potential to lead to service outages and other disruptions, such as property damage, ignition, blowing gas, road closures, evacuations, and responses by police and fire departments.

As noted above, this measure has the lowest number of damages and is the smallest contributor to the overall damage prevention measure. Further, the graph's vertical scale in Figure 6 makes the year-to-year changes appear more dramatic than those displayed in Figures 2, 3, 4, and 5. This graph's vertical scale also exaggerates the fluctuations for the smaller LDCs. Several previous reports have noted that the smaller LDCs (such as Corning and Liberty) can have seemingly large variations from year to year because of the relatively small number of one-call tickets generated in their service territories.

Figure 7 below displays a comparison between 2015 and 2024 of the collective damage prevention performance, broken down by damage category:

Metric	2015	2024
Number of Tickets	801,920	762,521
Mismarks	0.48	0.39
Co. & Co. Contractor Error	0.10	0.09
Excavator Error	1.08	0.83
No-Calls	0.51	0.31
Total Damages (per 1,000)	2.18	1.61

Figure 7 - Comparison between 2015 and 2024

Emergency Response

The Commission’s regulations at 16 NYCRR §255.825(d) requires that LDCs provide a monthly report that includes a breakdown of the total number of leak, odor, and emergency reports received and responded to during the prior calendar month broken down in intervals of 15 minutes during normal business hours, weekdays outside business hours, and weekends and holidays. This reporting requirement and performance measure serve to evaluate LDCs’ responses to gas leak, odor, and emergency notifications that the public generates or other

authorities such as police and fire departments, and municipalities.

The Commission has established the following as minimum emergency response standards within which time the LDCs must respond to: 75% of leak, odor, and emergency reports within 30 minutes; 90% within 45 minutes; and 95% within 60 minutes. Typically, LDCs have a few instances of response times exceeding 60 minutes.⁹ For the purposes of reporting, the response times are measured from the time a call is received (from first responders, municipalities, the 911 emergency call center, etc.) and there is enough information to dispatch qualified company personnel to the time qualified company personnel arrives at the location.¹⁰

Figure 8 displays the aggregated 11 major LDCs' annual emergency response time performance for each standard since 2020, with the 2024 performance presented in black.

⁹ The LDCs are expected to review the circumstances of each instance exceeding 60 minutes and, where possible, work towards their future elimination.

¹⁰ Qualified personnel are defined as company representatives who are properly trained and equipped to investigate leak, odor, and emergency reports in accordance with approved company procedures and 16 NYCRR §255.604, operator qualification requirements.

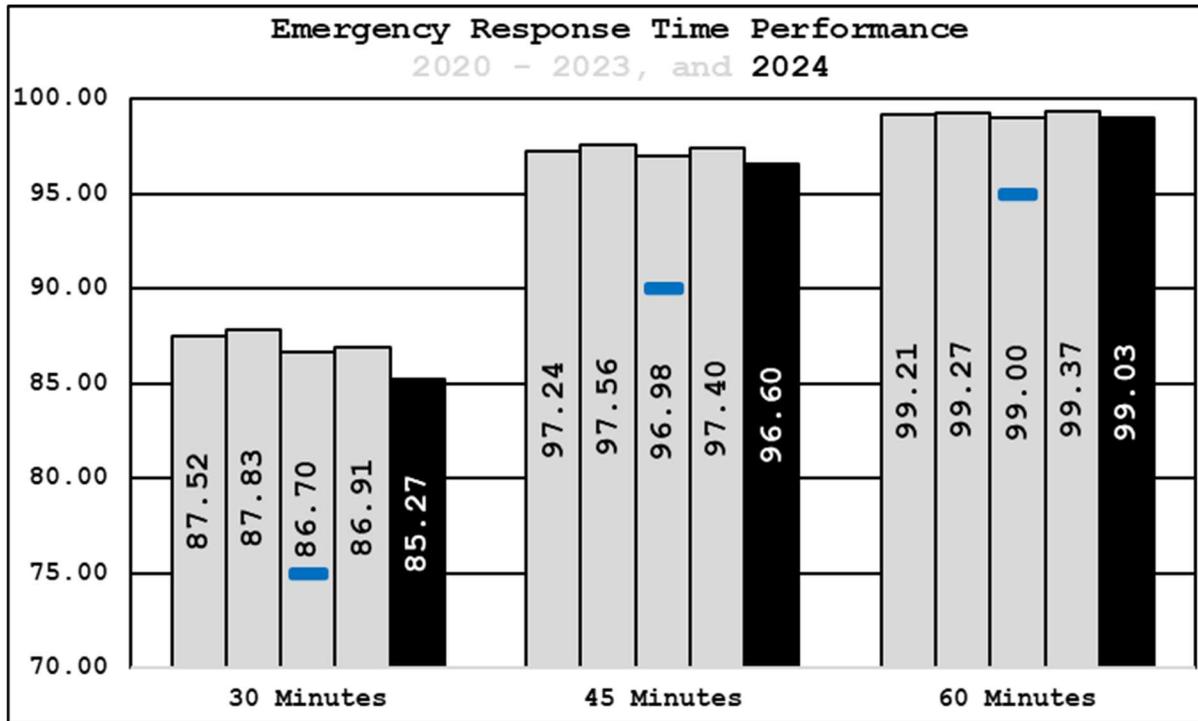


Figure 8 - Emergency Response Time Performance

In 2024, the total number of leak, odor, and emergency reports were 2.2% higher than 2023, increasing from 142,489 in 2023 to 145,655 in 2024. Also in 2024, the LDCs' performance declined slightly when compared to the previous year. The data over the five-year period, 2020 through 2024, shows that the LDC operators continue to maintain their performance for this category. For the past 10 years, 2015 through 2024, it shows a downward trendline in number of calls, with an average of 170,094 leak, odor, and emergency notifications per year across the LDCs. The decline in number of notifications may be attributed to the reduction of leaks on the LDCs' systems, which will be discussed below in the leak management section, and due to more aggressive and proactive leak prone pipe removal programs approved by the Commission within rate proceedings. These removal programs directly affect and reduce the total number of leaks and associated odor complaints.

Figure 9 below presents the percentage of emergency response times achieved within 30 minutes by each LDC in the past five calendar years, 2020 through 2024.

LDCs	2020	2021	2022	2023	2024
Central Hudson	84.4	84.3	85.6	87.9	86.2
Con Edison	98.3	95.9	97.2	97.3	98.2
Corning	77.3	86.5	82.8	84.0	84.0
NFG	95.4	95.8	93.1	96.7	97.0
NGrid LI	83.1	82.1	78.5	77.4	76.6
NGrid NY	81.5	78.7	78.2	78.1	79.7
NGrid Upstate	80.5	84.3	81.1	79.0	78.8
NYSEG	76.7	83.6	82.5	82.8	73.0
O&R	93.2	91.8	87.8	88.4	88.2
RG&E	77.9	89.1	88.5	88.1	72.0
Liberty	75.4	77.7	76.3	79.6	82.3

Figure 9 - Emergency Response Times for 30 Minutes (%)

As seen in Figure 9, nine LDCs met and exceeded the minimum standard of responding to 75% of leak, odor, and emergency reports within 30 minutes. The performance level of two of the 11 LDCs fell below the 75% minimum standard. NYSEG's and RG&E's performance declined to 73% and 72%, respectively. Ten of the 11 LDC's exceeded the minimum standard of responding to 90% of leak, odor, and emergency reports within 45 minutes with RG&E's performance declining to 89.9%. In addition, all 11 LDC's exceeded the minimum 95% response time standard within the 60 minutes. The data for the 45- and 60-minute response time standards are provided in Appendices D and E, respectively.

Staff is encouraged to see that all LDCs have continued to place emphasis on this measure over the years with the goal remaining the jointly established 75%, 90%, and 95% emergency response time standards. Staff expects that all LDCs will continue to evaluate and monitor their performance and to identify areas where they can implement best practices to further exceed the benchmarks.

Leak Management

The purpose of evaluating the LDCs' leak management programs is to gauge how the LDCs are responding to and addressing leaks on their systems, eliminating potentially hazardous leaks that are found, reducing total leak backlogs, and evaluating the number of leaks discovered and leaks repaired, in total and per each LDC's respective system mileage.

The gas pipeline safety regulations contained in 16 NYCRR Part 255 include requirements for classifying leaks according to their relative hazard by considering factors such as whether gas migration is detected near buildings, in manholes, vaults, catch basins, under paved versus unpaved areas, etcetera. LDCs must monitor and repair all leaks

classified as potentially hazardous according to the pipeline safety regulations, with LDCs eliminating any hazardous conditions immediately. LDCs must reevaluate all other leaks must during the next required leakage survey or annually, whichever is less, but have no mandatory repair timeframes.

Unrepaired, potentially hazardous leaks pose an increased safety risk to the public. The risk is further exacerbated when the ground contains frost, which increases the chance gas will migrate into buildings. The frost essentially acts as a blanket that does not allow gas to readily vent to atmosphere through the soil, forcing gas to pool under the surface until it can find underground pathways and enter structures. Although leak backlogs on any day are a snapshot in time, the end of the calendar year is significant due to it coinciding with the beginning of the frost season. Thus, all data analyses are presented as of the last two weeks in December.

The data reported by the LDCs related to leak management are contained in Appendices F through L. The leak management measure looks at the year-end backlog of potentially hazardous leaks and total leaks. This measure does not substitute for, and is not a reflection upon, any LDC's compliance with pipeline safety regulations. The data reported includes: leak repairs on mains and services by material type; the backlogs of potentially hazardous leaks and total leaks; and repaired and discovered potentially hazardous leaks.

Analysis of leak management data can also provide an indication of the material type's susceptibility to leakage. As a means of continuously improving leak management programs, Staff encourages LDCs to identify and remove or replace leak prone pipe, such as cast or wrought iron, bare or ineffectively coated steel, certain brittle plastic materials, and other

materials that the LDC considers leak prone pipe. Performance programs to remove deteriorating and leak prone infrastructure and reduce leak backlogs have been incorporated into most of the LDCs' past and current rate plans. The long-term goal is the elimination of aging pipeline infrastructure that, due to its vulnerability to leakage, presents greater safety risks to the public and environment. Thus, the LDCs should remove, replace, or rehabilitate aging pipeline infrastructure with modern materials that have been shown to be less likely to leak. These performance programs are the primary drivers in the significant reduction of hazardous leaks, total leaks, and the associated fugitive methane emissions associated with the leaks.

The overall year-end backlog of potentially hazardous leaks decreased from 30 in 2023 to 28 in 2024, representing a 6.7% improvement and is down 97.6% when compared to 1,178 in 2003. This demonstrates that LDCs have maintained continual efforts in managing leak surveys and are completing them earlier in the year, to allow for time to repair discovered leaks.

Figure 10 displays the backlog of potentially hazardous leaks from 2020 through 2024.¹¹ The numerical leak data for this category is contained in Appendix H.

¹¹ The backlog of leaks requiring repair is defined as active leaks in the system consisting of: Type 1, requiring immediate effort to protect life and property, continuous action to eliminate the hazard, and repairs on a day-after-day basis or the condition kept under daily surveillance until corrected; Type 2A, monitored every two weeks and repaired within six months; and Type 2, monitored every two months and repaired within one year.

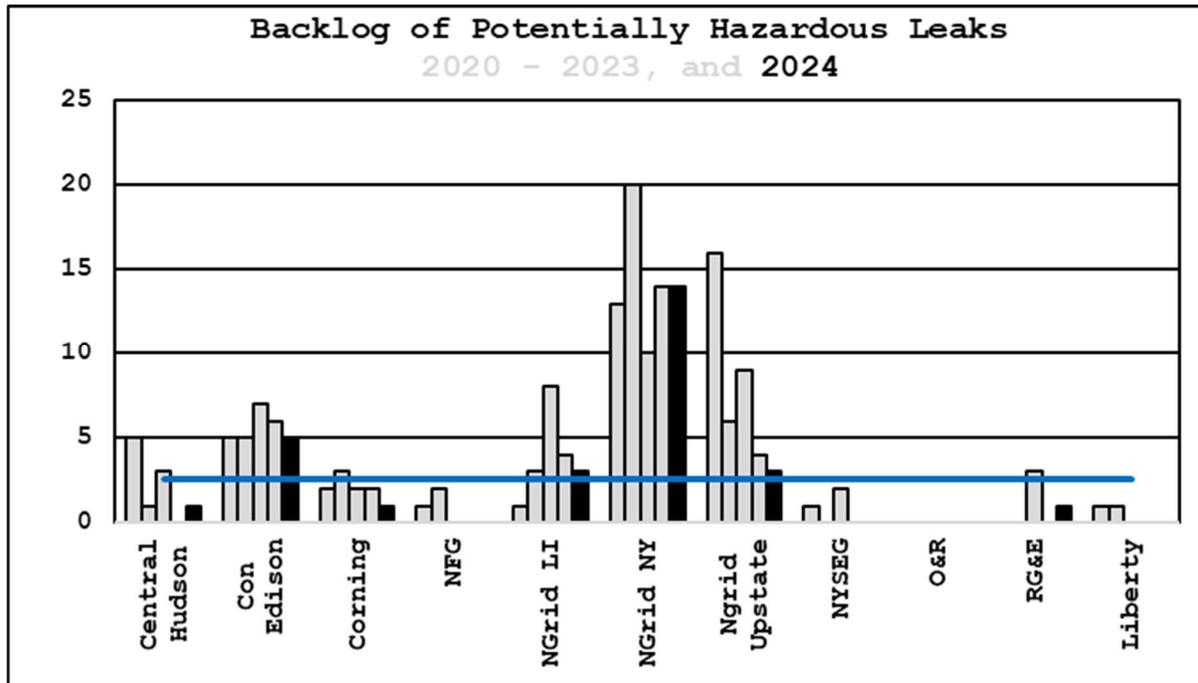


Figure 10 - Backlog of Potentially Hazardous Leaks

As seen in Figure 10, LDCs' continued efforts have led to negligible backlogs for potentially hazardous leaks as of the last two weeks in December, entering the frost season.

Total leak backlogs include all potentially hazardous leaks, as identified above, and Type 3 leaks. In the State's pipeline safety regulations, Type 3 leaks are defined as those leaks that are not potentially hazardous at the time of inspection and which the LDC reasonably expects to remain that way. However, LDCs must reevaluate Type 3 during the next required, regularly scheduled leakage survey or annually, whichever is less, though regulations do not provide a mandatory repair timeframe.

Without a mandatory repair timeframe, LDCs could allow their total leak backlog to grow while still meeting the minimum pipeline safety regulations. In recent years the Commission has incorporated negative revenue adjustments into the respective

LDC's rate plans in an effort to reduce each LDC's total leak backlog as well as its potentially hazardous leak backlog. In addition, some LDCs' rate plans provide for positive revenue adjustments, as incentives for LDCs to continue reducing Type 3 leaks. This would result in a reduction of methane emissions, which is in line with State's goal to reduce the carbon footprint of the LDCs' gas systems and achieve the emission reduction targets of the Climate Leadership and Community Protection Act.

Figure 11 displays the backlog of total leaks (Type 1, 2A, 2, and 3) from 2020 through 2024. The numerical leak data is contained in Appendix K.

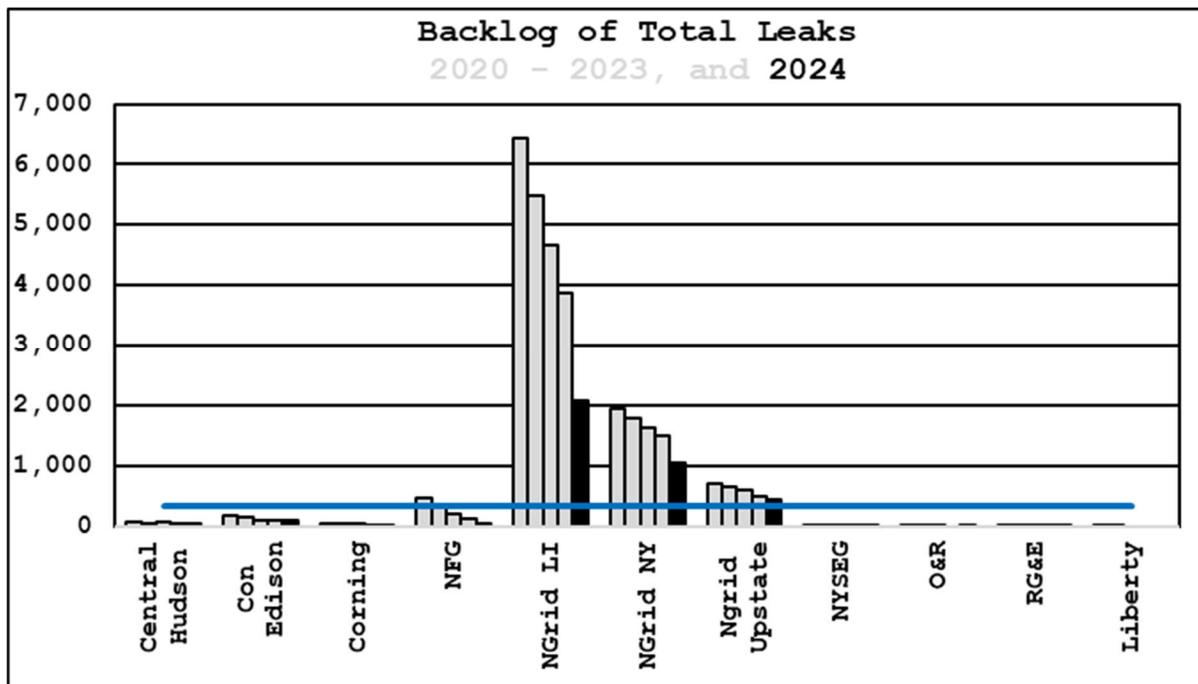


Figure 11 - Backlog of Total Leaks

As seen in Figure 11, the majority of LDCs have improved upon their respective backlogs of total leaks in 2024 when compared to that of 2023. NGrid LI and NGrid NY continue

to be outliers in this category even though they have improved from the previous calendar years. NGrid LI's and NGrid NY's improvements were 46.4% and 29.2%, respectively, when comparing 2024 to 2023. This resulted in a total of 2,230 fewer leaks in 2024. Their total leak backlogs, however, are considerably higher than that of the next highest LDC, NGrid Upstate, and account for 83.1% of the overall total leak backlog amongst the LDCs. Taken in total, NGrid LI, NGrid NY, and NGrid Upstate (NGrid Companies) account for 94.7% of the entire LDCs' total leak backlog. In fact, because of NGrid Companies' performance in this metric, the overall average total leak backlog is artificially high, making comparisons among the other LDCs difficult and overshadows the progress the other LDCs have made in reducing their backlogs.

The past five years data shows a downward trend for the overall leak backlog. However, given the fact that over 94.7% of the State's total leak backlog comprises leaks on NGrid Companies' pipeline systems, Staff expects that the NGrid Companies will continue to make every effort to aggressively reduce their leak backlogs, by accelerating the elimination of leak prone pipe from their systems and ramping up their leak repairs on pipe not scheduled for removal or replacement.

Statistically, performance improvements within this measure from 2023 to 2024 include the following: Central Hudson (7.5%) decreased from 40 total leaks to 37; Con Edison (9.7%) decreased from 103 to 93; Corning (42.9%) went from 21 to 12; NFG (60%) decreased from 115 to 46; NGrid LI (46.4%) decreased from 3,875 to 2,078; NGrid NY (29.2%) went from 1,485 to 1,052; and NGrid Upstate (13.6%) decreased from 502 to 434. Performance declines within the measure from 2023 to 2024 include the following: NYSEG (33.3%) increased from three to four; O&R (300%) increased from zero to three; and RG&E (20%)

increased from five to six. Liberty remained unchanged at zero total leaks. As the LDCs continue removing leak prone pipe over the next several years, Staff expects that the backlog of total leaks will continue to improve.

Figures 12 and 13 display the number of leaks discovered per leak type, and per system mileage, respectively. Figures 14 and 15 display the number of leaks repaired per leak type, and per system mileage, respectively. Figures 16 and 17 display the number of leaks repaired per material type, and per system mileage, respectively.

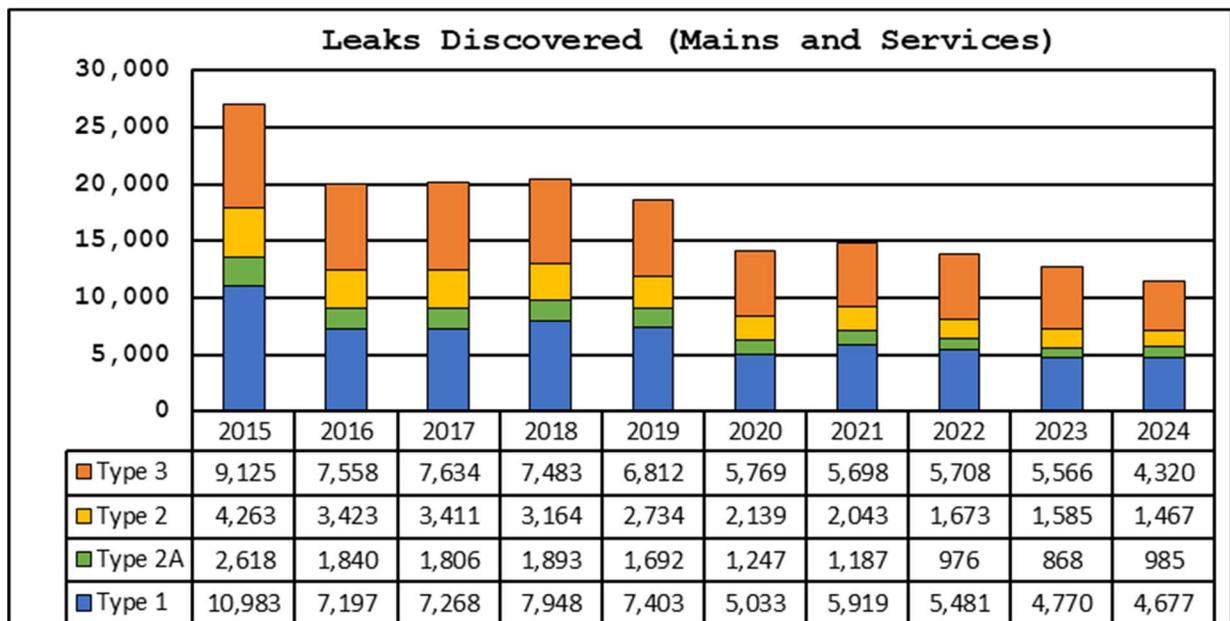


Figure 12 - Leaks Discovered by Type

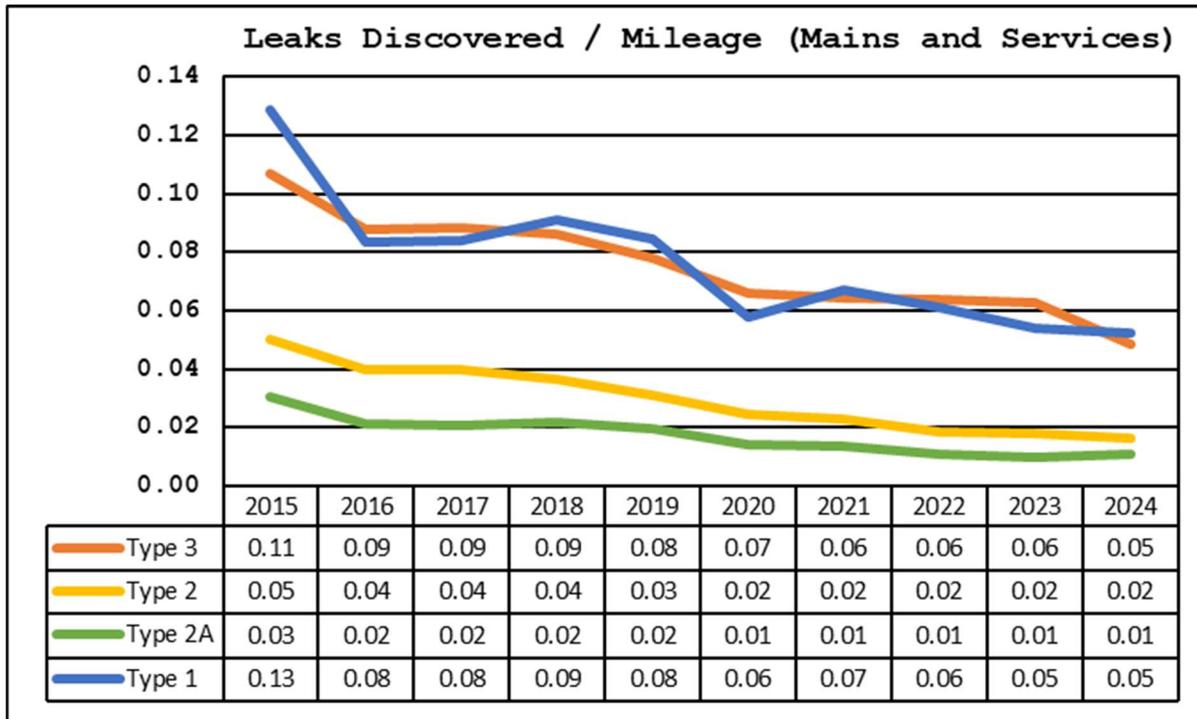


Figure 13 - Leaks Discovered by Type / Mileage

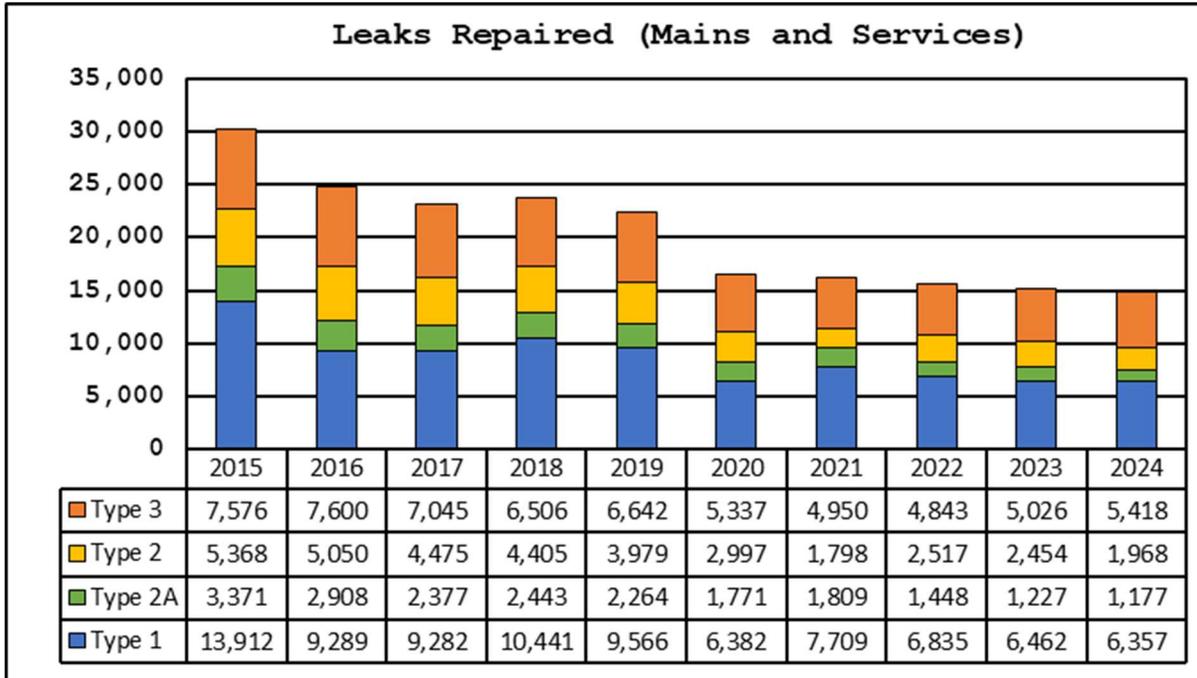


Figure 14 - Leaks Repaired by Type

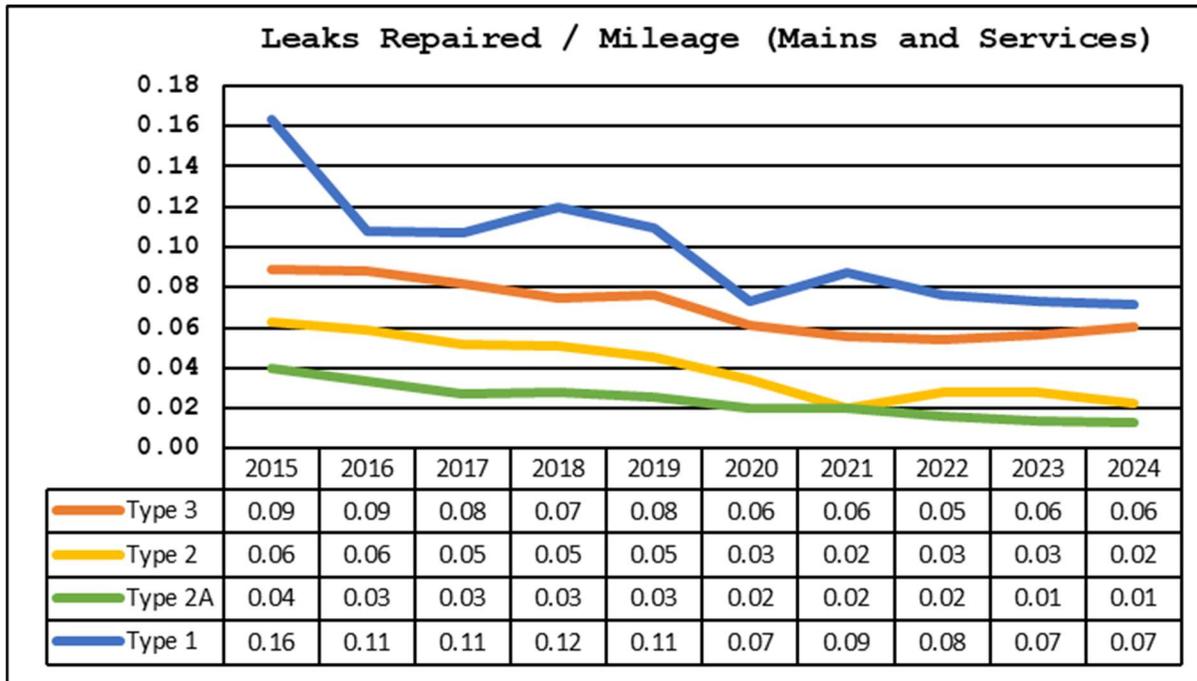


Figure 15 - Leaks Repaired by Type / Mileage

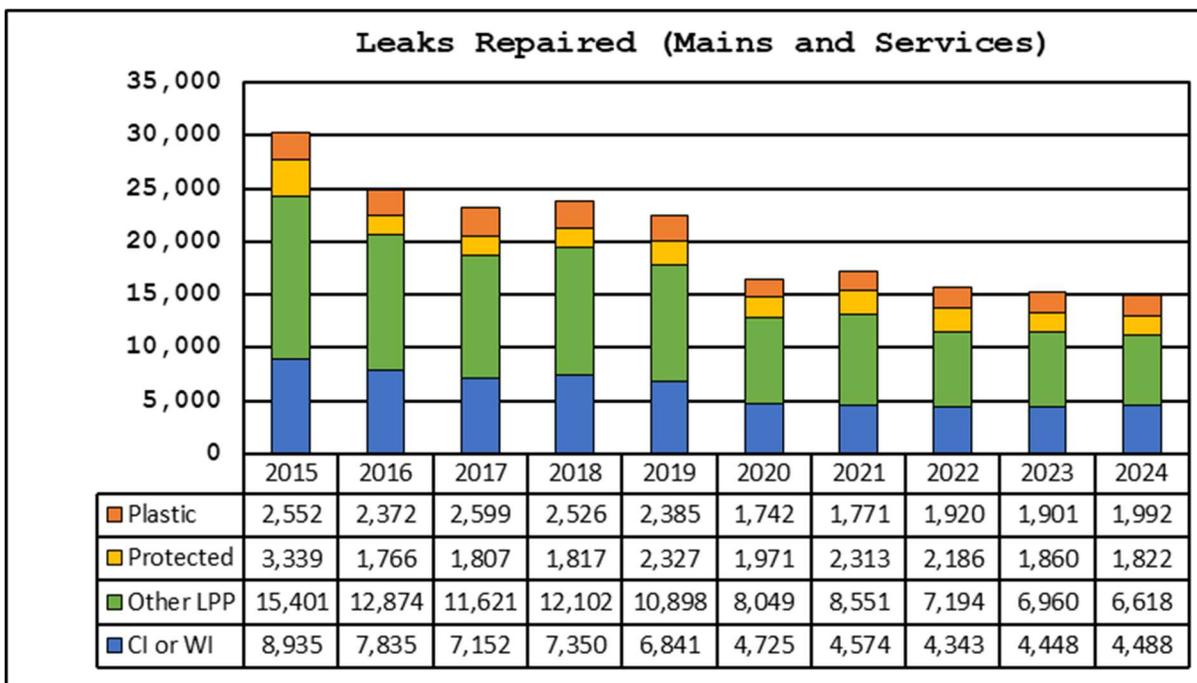


Figure 16 - Leaks Repaired by Material

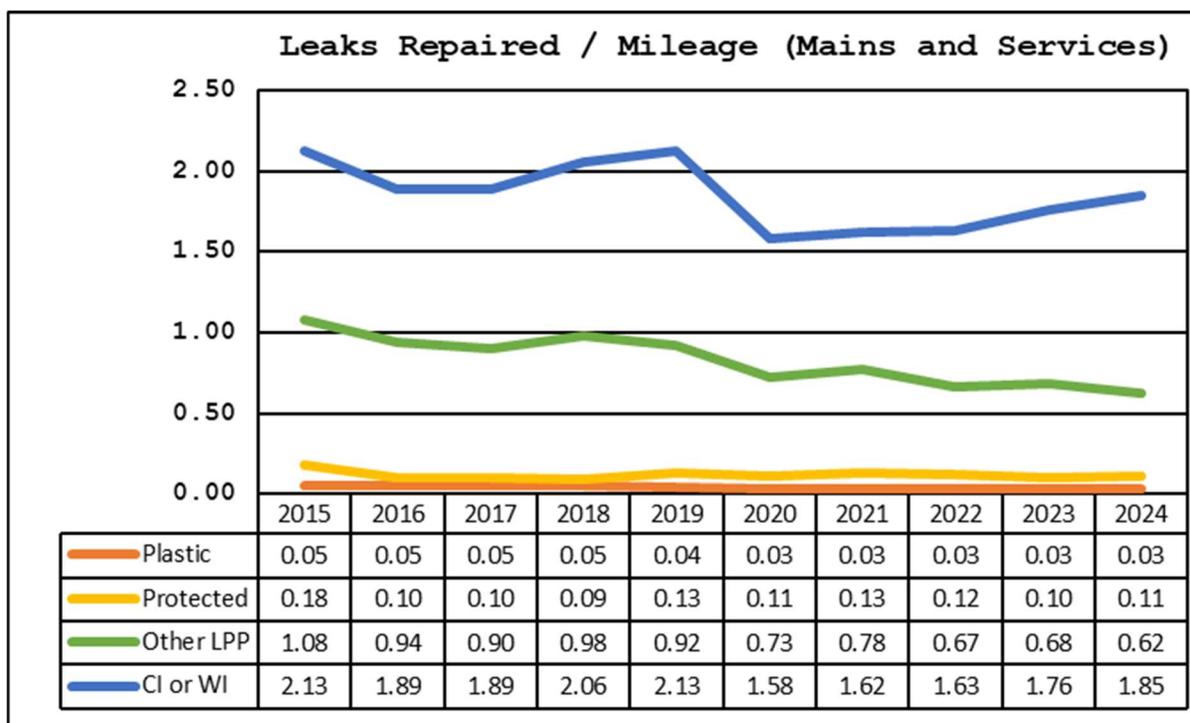


Figure 17 - Leaks Repaired by Material / Mileage

As seen in Figures 12 through 15, in 2024 the number of leaks discovered and repaired by leak type and material fluctuated. For instance, leaks categorized as Type 1, Type 2, and Type 3, experienced decreases in 2024 when compared with 2023. Discovered Type 2A leaks increased. Also, the number of repairs for Type 3 leaks increased in 2024, whereas the number of repairs for Type 1, Type 2, and Type 2A leaks decreased. The fluctuation in the number of leaks discovered and repaired by leak type and material could be attributed to the removal of leak prone infrastructure.

Figure 16 shows the number of leaks repaired per material type (plastic, protected, other leak prone pipe excluding cast and wrought-iron, and cast and wrought-iron). Each year from 2015 through 2024 there was a higher number of leaks repaired on other leak prone pipe (6,618) than on cast and wrought iron (4,448). However, when normalizing these figures

by the system mileage of the respective materials, as seen in Figure 17, an opposite relationship is shown. While more leaks are repaired on other leak prone pipe, the rate for leaks repaired per mile on cast and wrought iron (1.85) is nearly triple that of other leak prone pipe (0.62). This data suggests that cast and wrought iron pipelines have a greater potential for leakage than other leak prone pipe, and with other leak prone pipe being nearly five times more likely to leak than non-leak prone pipe.

The LDCs account for this within their leak prone pipe removal programs by assigning weighted factors to each material type. When the risk assessment models are finalized, these prioritized listings of leak prone pipe segments are used by LDCs to focus their removal or replacement efforts. This provides for a higher level of public safety.

Compliance Measure

For the final measure, Staff identifies instances of the LDCs' non-compliance with the minimum pipeline safety regulations through its audit process and evaluates LDCs on their respective compliance with those minimum regulations. This measure looks at non-compliance issues Staff identified during audits and investigations of the LDCs. Each year, Staff conducts statistically based audits and investigations of the LDCs to determine their level of compliance with the Commission's regulations. Each instance of non-compliance identified represents an area in which an LDC failed to meet these minimum requirements as prescribed.

Staff conducts compliance audits and investigations on a calendar year basis. The statistically based audits typically include a review of record and field activities. For the record audits, Staff reviews the previous calendar year's documentation

and reports on any instances of non-compliance with the pipeline safety regulations. Throughout the remainder of the year, Staff monitors LDC crews through field audits of the work the crews are performing and compares the LDC crews' performance with the regulations and the LDCs' applicable procedures. Like the record audit, any instances of non-compliance are documented and then reported.

For investigations, Staff is made aware, either through mandatory reporting and notifications or through complaints from the public, that an accident or incident has occurred or there is a pipeline related concern. Once notified, Staff evaluates the details of the event, performs on-site investigations and interviews, identifies the root cause or causes of the accident or incident, obtains any pertinent information, or photographs, and documents any instances of non-compliance.

For this measure, the year identified includes both the statistically based audits and investigations for that calendar year.¹² This measure is a lagging indicator since Staff needs time to conduct audits, report audit findings, and for LDCs to respond to Staff's findings. Audits are not considered complete until all steps are finalized. Because of this, 2023 findings are the most recent findings contained in this report. Staff's audits of 2024 records are currently in progress for inclusion in next year's Performance Measures Report.

Figure 18 below displays the total number of non-compliances for the five-year period from 2019 through 2023. The total number of non-compliances are then normalized by the

¹² This typically includes records generated, field activities performed, or accidents and incidents which occurred during the specific calendar year.

number of operating headquarters (OHQs) within an LDC. For each OHQ, Staff conducts a separate statistically based audit of activities as prescribed by Staff’s five-year audit plan. The associated data per LDC and the number of OHQs are located in Appendices M and N.

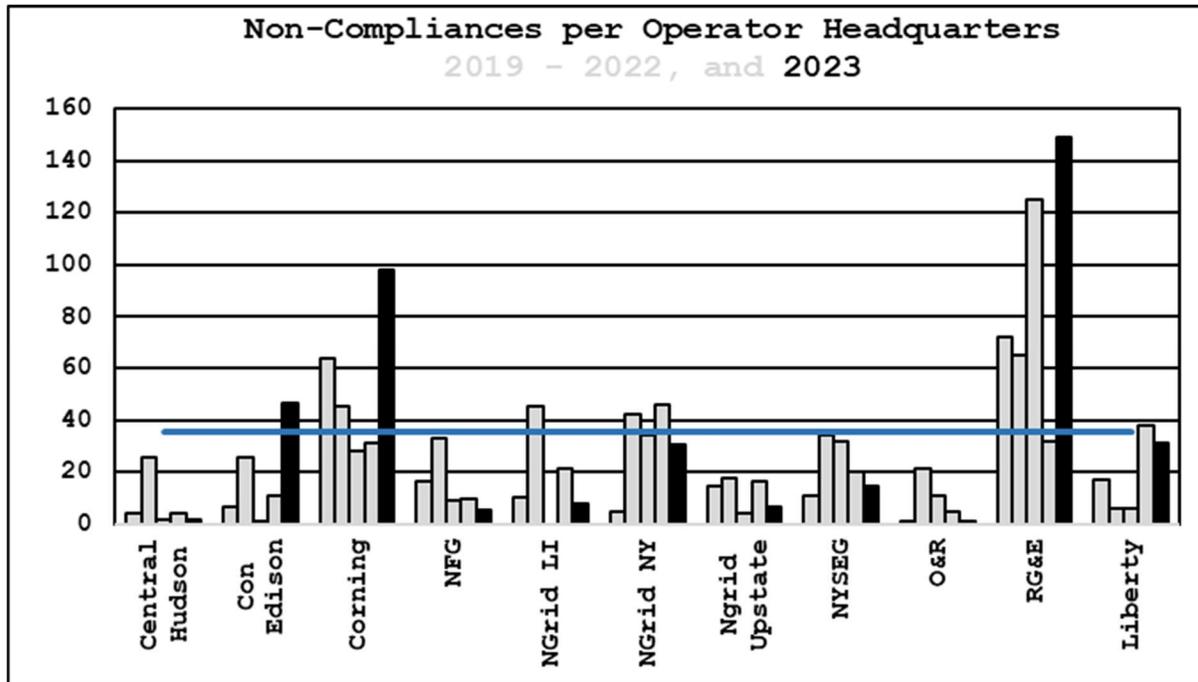


Figure 18 - Non-Compliances Identified through Audits

As seen in Figure 18, the data varies greatly from year to year. This is due, in part, to Staff’s five-year audit plan, which reviews sections of the pipeline safety regulations on varying frequencies based on the likelihood of risk to public safety, including life, property, and the environment. Therefore, the year-to-year graph does not represent a direct comparison of year-to-year compliance but summarizes the portion of the five-year audit conducted during each given year.

Staff identifies the regulations as either as high risk, which Staff audits audited annually, or as other risk, which Staff audits on a frequency of once every two, three,

four, or five years. Staff's focus is on the LDCs' compliance with the minimum pipeline safety regulations, but also includes areas in which LDCs, based upon historic experiences and identified risks, have chosen to exceed these minimum standards. In 2023, Staff identified a total of 909 instances of non-compliance for all 11 of the major LDCs. This accounts for 2.74% of the total number of records reviewed, and 0.13% of the total number of records available for review. In other words, 97.26% of the total number of records reviewed were compliant with the Commission's minimum pipeline safety regulations.

A review of the number of instances of non-compliance by LDCs in 2023 shows that the adjusted number of instances increased for three of the LDCs, while the other eight LDC's experienced decreases. For those LDCs that showed an increase in the number of instances of non-compliance in 2023, Con Edison, Corning, and RG&E contributed to 37.3%, 12.3%, 12.3%, and 12.8%, respectfully, of the instances of non-compliance with a high-risk regulation. Additionally, Con Edison, Corning, and RG&E contributed to 64.3% 35.6%, 9.7%, and 19%, respectfully, of the instances of non-compliance with an other-risk regulation. These three LDCs also account for 13.5%, or seven out of 52, of the total number of OHQs.

The LDCs primarily attributed these increases to problems experienced during the transition to from maintaining paper records to electronic records, inspections that the LDCs did not completed due to access-related issues, and LDCs' misunderstanding or misinterpretation of the safety regulations regarding: high pressure piping notifications, leakage surveys, active corrosion monitoring, valve maintenance, general provisions, warning tags, relief valve annual inspections, external corrosion control, and inactive service lines. However, after identifying and bringing these issues to LDCs'

attention, the LDCs have developed and implemented plans to re-train their employees, revise electronic forms to capture required steps in inspections, and complete inspections that they either had not completed or documented properly. As such, Staff does not expect reoccurrences of violations related to these issues.

As indicated earlier in this report, the data reported varies greatly from year to year, which is due, in part, to Staff's five-year audit cycle and different required activities being reviewed during different calendar years. These audits and investigations to verify compliance with the pipeline safety regulations are conducted on varying frequencies determined by the relative risk each regulation poses to public safety.

Conclusion

Gas is a safe and reliable energy commodity when handled and transported properly. The pipeline safety performance measures are an important tool provides the Commission and Staff the ability to evaluate trends in key areas such as damage prevention, emergency response, leak management, and compliance with the Commission's pipeline safety regulations. The LDCs must continue to focus on these areas to further reduce risks in providing gas to consumers.

Over the past 10 years, LDCs have worked to improve performance in these key areas of safety as identified within this report. Over this time: damage prevention performance improved 26.1%, decreasing from 2.18 damages per 1,000 locate requests in 2015 to 1.61 in 2024; response to leak, odor, and emergency reports within 30-minutes, 45-minutes, and 60-minutes improved from 83.1%, 96%, and 98.6%, to 85.3%, 96.6, and 99%, respectfully; and the year-end backlogs of potentially hazardous and total leaks have decreased 58.8% and 80.5%, respectively,

going from 68 and 19,270 in 2015, to 28 and 3,765 in 2024, respectively.

As LDCs continue their outreach and education efforts to excavator communities as well as the public, adopt best practices in responding to leak, odor, and emergency reports, work to remove leak prone pipe, and as quality assurance and quality control programs continue to mature, Staff expects that the LDCs will realize further improvements. Staff will continue to evaluate the LDCs' performance via the measures described in this report and encourage the LDCs to evaluate their past and current practices. LDCs with clear opportunities for improvement when compared to their peers should reach out to the LDCs that showed superior performance levels to determine the incremental and, if necessary, entirely new approaches needed to achieve sustained improvement.

Staff further encourages the LDCs that made significant improvements to respond to this report and share best practices that have enabled them to make these improvements. Staff will continue to meet with LDCs on a regular basis and will continue to monitor LDCs' performance. Staff will discuss performance trends with LDCs at these meetings and will further analyze these trends in future performance measure reports.

Appendix A

Historical Case Numbers¹³

Year Analyzed	Case Number
2003	04-G-0457
2004	05-G-0204
2005	06-G-0566
2006	07-G-0461
2007	08-G-0413
2008	09-G-0454
2009	10-G-0225
2010	11-G-0242
2011	12-G-0222
2012	13-G-0213
2013	14-G-0176
2014	15-G-0248
2015	16-G-0254
2016	17-G-0245
2017	18-G-0260
2018	19-G-0298
2019	20-G-0195
2020	21-G-0165
2021	22-G-0165
2022	23-G-0224
2023	24-G-0145
2024	25-G-0147

¹³ The appendices to this report include the most recent year under analysis plus the four previous years. This table is provided to aid those wishing to research prior years.

Appendix B

Collective Damage Prevention Data

Number of One-Call Tickets

LDCs	2020	2021	2022	2023	2024
Central Hudson	30,414	30,187	30,465	28,484	29,414
Con Edison	98,678	116,897	117,509	105,681	105,977
Corning	5,676	5,398	4,934	5,056	4,616
NFG	115,115	129,056	123,288	125,808	118,379
NGrid LI	151,040	136,705	126,559	120,822	123,913
NGrid NY	90,473	100,391	105,211	105,497	110,074
NGrid Upstate	106,054	113,528	109,529	105,241	103,402
NYSEG	60,685	59,894	62,815	61,820	55,903
O&R	34,004	36,970	39,272	38,339	39,486
RG&E	69,105	74,818	73,066	64,256	66,914
Liberty	4,254	4,808	4,965	4,854	4,443
Total	765,498	808,652	797,613	765,858	762,521

Number of Damages due to Mismarks

LDCs	2020	2021	2022	2023	2024
Central Hudson	19	13	15	12	8
Con Edison	43	48	51	42	48
Corning	2	3	2	2	0
NFG	29	24	27	19	20
NGrid LI	64	68	69	70	72
NGrid NY	61	50	58	59	62
NGrid Upstate	39	38	38	35	33
NYSEG	18	19	20	18	9
O&R	7	21	9	14	20
RG&E	36	23	29	27	22
Liberty	1	1	0	1	0
Total	319	308	318	299	294

Damages due to Mismarks per 1,000 Tickets

LDCs	2020	2021	2022	2023	2024
Central Hudson	0.62	0.43	0.49	0.42	0.27
Con Edison	0.44	0.41	0.43	0.40	0.45
Corning	0.35	0.56	0.41	0.40	0.00
NFG	0.25	0.19	0.22	0.15	0.17
NGrid LI	0.42	0.50	0.55	0.58	0.58
NGrid NY	0.67	0.50	0.55	0.56	0.56
NGrid Upstate	0.37	0.33	0.35	0.33	0.32
NYSEG	0.30	0.32	0.32	0.29	0.16
O&R	0.21	0.57	0.23	0.37	0.51
RG&E	0.52	0.31	0.41	0.42	0.33
Liberty	0.24	0.21	0.00	0.21	0.00

Appendix B (Continued)

Number of Damages due to No-calls

LDCs	2020	2021	2022	2023	2024
Central Hudson	5	8	10	6	9
Con Edison	28	31	27	49	20
Corning	5	3	2	0	0
NFG	32	37	44	41	42
NGrid LI	92	97	82	81	89
NGrid NY	31	21	21	15	24
NGrid Upstate	41	36	28	26	21
NYSEG	18	19	12	12	8
O&R	18	30	27	17	14
RG&E	17	17	22	21	12
Liberty	1	3	0	4	0
Total	288	302	275	272	239

Damages due to No-calls per 1,000 Tickets

LDCs	2020	2021	2022	2023	2024
Central Hudson	0.16	0.27	0.33	0.21	0.31
Con Edison	0.28	0.27	0.23	0.46	0.19
Corning	0.88	0.56	0.41	0.00	0.00
NFG	0.28	0.29	0.36	0.33	0.35
NGrid LI	0.61	0.71	0.65	0.67	0.72
NGrid NY	0.34	0.21	0.20	0.14	0.22
NGrid Upstate	0.39	0.32	0.26	0.25	0.20
NYSEG	0.30	0.32	0.19	0.19	0.14
O&R	0.53	0.81	0.69	0.44	0.35
RG&E	0.25	0.23	0.30	0.33	0.18
Liberty	0.24	0.62	0.00	0.82	0.00

Number of Damages due to Excavator Error

LDCs	2020	2021	2022	2023	2024
Central Hudson	11	12	11	4	16
Con Edison	54	56	52	55	55
Corning	9	7	6	7	6
NFG	110	108	112	103	104
NGrid LI	114	122	154	121	108
NGrid NY	169	99	105	122	105
NGrid Upstate	144	106	120	118	102
NYSEG	60	56	61	62	57
O&R	31	25	29	36	32
RG&E	33	40	49	66	41
Liberty	8	7	8	12	4
Total	743	638	707	706	630

Appendix B (Continued)

Damages due to Excavator Error per 1,000 Tickets

LDCs	2020	2021	2022	2023	2024
Central Hudson	0.36	0.40	0.36	0.14	0.54
Con Edison	0.55	0.48	0.44	0.52	0.52
Corning	1.59	1.30	1.22	1.38	1.30
NFG	0.96	0.84	0.91	0.82	0.88
NGrid LI	0.75	0.89	1.22	1.00	0.87
NGrid NY	1.87	0.99	1.00	1.16	0.95
NGrid Upstate	1.36	0.93	1.10	1.12	0.99
NYSEG	0.99	0.93	0.97	1.00	1.02
O&R	0.91	0.68	0.74	0.94	0.81
RG&E	0.48	0.53	0.67	1.03	0.61
Liberty	1.88	1.46	1.61	2.47	0.90

Number of Damages due to Co. & Co. Contractor Error

LDCs	2020	2021	2022	2023	2024
Central Hudson	9	9	3	9	5
Con Edison	15	11	13	11	20
Corning	0	0	1	0	0
NFG	3	3	3	1	5
NGrid LI	8	13	9	7	13
NGrid NY	6	4	5	1	3
NGrid Upstate	8	5	10	13	8
NYSEG	6	7	3	2	1
O&R	5	10	6	3	7
RG&E	4	2	6	1	4
Liberty	0	0	0	1	0
Total	64	64	59	49	66

Damages due to Co. & Co. Contractor Error per 1,000 Tickets

LDCs	2020	2021	2022	2023	2024
Central Hudson	0.30	0.30	0.10	0.32	0.17
Con Edison	0.15	0.09	0.11	0.10	0.19
Corning	0.00	0.00	0.20	0.00	0.00
NFG	0.03	0.02	0.02	0.01	0.04
NGrid LI	0.05	0.10	0.07	0.06	0.10
NGrid NY	0.07	0.04	0.05	0.01	0.03
NGrid Upstate	0.08	0.04	0.09	0.12	0.08
NYSEG	0.10	0.12	0.05	0.03	0.02
O&R	0.15	0.27	0.15	0.08	0.18
RG&E	0.06	0.03	0.08	0.02	0.06
Liberty	0.00	0.00	0.00	0.21	0.00

Appendix B (Continued)

Number of Total Damages

LDCs	2020	2021	2022	2023	2024
Central Hudson	44	42	39	31	38
Con Edison	140	146	143	157	143
Corning	16	13	11	9	6
NFG	174	172	186	164	171
NGrid LI	278	300	314	279	282
NGrid NY	267	174	189	197	194
NGrid Upstate	232	185	196	192	164
NYSEG	102	101	96	94	75
O&R	61	86	71	70	73
RG&E	90	82	106	115	79
Liberty	10	11	8	18	4
Total	1,414	1,312	1,359	1,326	1,229

Total Damages per 1,000 Tickets

LDCs	2020	2021	2022	2023	2024
Central Hudson	1.45	1.39	1.28	1.09	1.29
Con Edison	1.42	1.25	1.22	1.49	1.35
Corning	2.82	2.41	2.23	1.78	1.30
NFG	1.51	1.33	1.51	1.30	1.44
NGrid LI	1.84	2.19	2.48	2.31	2.28
NGrid NY	2.95	1.73	1.80	1.87	1.76
NGrid Upstate	2.19	1.63	1.79	1.82	1.59
NYSEG	1.68	1.69	1.53	1.52	1.34
O&R	1.79	2.33	1.81	1.83	1.85
RG&E	1.30	1.10	1.45	1.79	1.18
Liberty	2.35	2.29	1.61	3.71	0.90

Appendix C¹⁴

Individual Damage Prevention Data

Central Hudson	2020	2021	2022	2023	2024	LDCs
Number of Tickets	30,414	30,187	30,465	28,484	29,414	762,521
Mismarks	0.62	0.43	0.49	0.42	0.27	0.39
No-Calls	0.16	0.27	0.33	0.21	0.31	0.31
Excavator Error	0.36	0.40	0.36	0.14	0.54	0.83
Co. & Co. Contractor Error	0.30	0.30	0.10	0.32	0.17	0.09
Total	1.45	1.39	1.28	1.09	1.29	1.61

Con Edison	2020	2021	2022	2023	2024	LDCs
Number of Tickets	98,678	116,897	117,509	105,681	105,977	762,521
Mismarks	0.44	0.41	0.43	0.40	0.45	0.39
No-Calls	0.28	0.27	0.23	0.46	0.19	0.31
Excavator Error	0.55	0.48	0.44	0.52	0.52	0.83
Co. & Co. Contractor Error	0.15	0.09	0.11	0.10	0.19	0.09
Total	1.42	1.25	1.22	1.49	1.35	1.61

Corning	2020	2021	2022	2023	2024	LDCs
Number of Tickets	5,676	5,398	4,934	5,056	4,616	762,521
Mismarks	0.35	0.56	0.41	0.40	0.00	0.39
No-Calls	0.88	0.56	0.41	0.00	0.00	0.31
Excavator Error	1.59	1.30	1.22	1.38	1.30	0.83
Co. & Co. Contractor Error	0.00	0.00	0.20	0.00	0.00	0.09
Total	2.82	2.41	2.23	1.78	1.30	1.61

¹⁴ The Total performance level may not equal the sum of the four-metrics due to rounding.

Appendix C¹³ (Continued)

NFG	2020	2021	2022	2023	2024	LDCs
Number of Tickets	115,115	129,056	123,288	125,808	118,379	762,521
Mismarks	0.25	0.19	0.22	0.15	0.17	0.39
No-Calls	0.28	0.29	0.36	0.33	0.35	0.31
Excavator Error	0.96	0.84	0.91	0.82	0.88	0.83
Co. & Co. Contractor Error	0.03	0.02	0.02	0.01	0.04	0.09
Total	1.51	1.33	1.51	1.30	1.44	1.61

NGrid LI	2020	2021	2022	2023	2024	LDCs
Number of Tickets	151,040	136,705	126,559	120,822	123,913	762,521
Mismarks	0.42	0.50	0.55	0.58	0.58	0.39
No-Calls	0.61	0.71	0.65	0.67	0.72	0.31
Excavator Error	0.75	0.89	1.22	1.00	0.87	0.83
Co. & Co. Contractor Error	0.05	0.10	0.07	0.06	0.10	0.09
Total	1.84	2.19	2.48	2.31	2.28	1.61

NGrid NY	2020	2021	2022	2023	2024	LDCs
Number of Tickets	90,473	100,391	105,211	105,497	110,074	762,521
Mismarks	0.67	0.50	0.55	0.56	0.56	0.39
No-Calls	0.34	0.21	0.20	0.14	0.22	0.31
Excavator Error	1.87	0.99	1.00	1.16	0.95	0.83
Co. & Co. Contractor Error	0.07	0.04	0.04	0.01	0.03	0.09
Total	2.95	1.73	1.80	1.87	1.76	1.61

Appendix C¹³ (Continued)

NGrid Upstate	2020	2021	2022	2023	2024	LDCs
Number of Tickets	106,054	113,528	109,529	105,241	103,402	762,521
Mismarks	0.37	0.33	0.35	0.33	0.32	0.39
No-Calls	0.39	0.32	0.26	0.25	0.20	0.31
Excavator Error	1.36	0.93	1.10	1.12	0.99	0.83
Co. & Co. Contractor Error	0.08	0.04	0.09	0.12	0.08	0.09
Total	2.19	1.63	1.79	1.82	1.59	1.61

NYSEG	2020	2021	2022	2023	2024	LDCs
Number of Tickets	60,685	59,894	62,815	61,820	55,903	762,521
Mismarks	0.30	0.32	0.32	0.29	0.16	0.39
No-Calls	0.30	0.32	0.19	0.19	0.14	0.31
Excavator Error	0.99	0.93	0.97	1.00	1.02	0.83
Co. & Co. Contractor Error	0.10	0.12	0.05	0.03	0.02	0.09
Total	1.68	1.69	1.53	1.52	1.34	1.61

O&R	2020	2021	2022	2023	2024	LDCs
Number of Tickets	34,004	36,970	39,272	38,339	39,486	762,521
Mismarks	0.21	0.57	0.23	0.37	0.51	0.39
No-Calls	0.53	0.81	0.69	0.44	0.35	0.31
Excavator Error	0.91	0.68	0.74	0.94	0.81	0.83
Co. & Co. Contractor Error	0.15	0.27	0.15	0.08	0.18	0.09
Total	1.79	2.33	1.81	1.83	1.85	1.61

Appendix C¹³ (Continued)

RG&E	2020	2021	2022	2023	2024	LDCs
Number of Tickets	69,105	74,818	73,066	64,256	66,914	762,521
Mismarks	0.52	0.31	0.40	0.42	0.33	0.39
No-Calls	0.25	0.23	0.30	0.33	0.18	0.31
Excavator Error	0.48	0.53	0.67	1.03	0.61	0.83
Co. & Co. Contractor Error	0.06	0.03	0.08	0.02	0.06	0.09
Total	1.30	1.10	1.45	1.79	1.18	1.61

Liberty	2020	2021	2022	2023	2024	LDCs
Number of Tickets	4,254	4,808	4,965	4,854	4,443	762,521
Mismarks	0.24	0.21	0.00	0.21	0.00	0.39
No-Calls	0.24	0.62	0.00	0.82	0.00	0.31
Excavator Error	1.88	1.46	1.61	2.47	0.90	0.83
Co. & Co. Contractor Error	0.00	0.00	0.00	0.21	0.00	0.09
Total	2.35	2.29	1.61	3.71	0.90	1.61

Appendix D

Emergency Response Times for 45 Minutes (%)

LDCs	2020	2021	2022	2023	2024
Central Hudson	99.4	99.1	99.4	99.6	99.6
Con Edison	99.9	99.2	99.9	99.8	99.8
Corning	95.0	97.0	96.5	95.3	96.8
NFG	99.1	99.3	96.4	99.4	99.3
NGrid LI	97.7	96.9	95.4	96.6	96.1
NGrid NY	96.2	95.6	95.3	95.3	95.8
NGrid Upstate	93.7	95.9	94.9	94.3	94.4
NYSEG	93.0	96.3	95.5	96.4	92.2
O&R	99.3	99.0	97.9	98.6	98.7
RG&E	93.8	98.2	97.9	97.8	89.9
Liberty	92.0	93.5	91.4	92.6	95.8

Appendix E

Emergency Response Times for 60 Minutes (%)

LDCs	2020	2021	2022	2023	2024
Central Hudson	99.9	99.9	99.9	99.9	99.9
Con Edison	99.9	99.4	99.9	99.9	99.9
Corning	98.6	98.5	98.8	98.6	99.5
NFG	99.8	99.9	97.2	99.9	99.8
NGrid LI	99.7	99.5	98.8	99.5	99.5
NGrid NY	99.1	98.9	98.8	98.8	98.7
NGrid Upstate	97.4	98.4	98.3	98.2	98.3
NYSEG	97.9	99.1	99.0	99.4	98.4
O&R	99.9	99.9	99.9	99.9	99.9
RG&E	98.2	99.7	99.6	99.4	96.1
Liberty	97.3	98.5	97.4	97.6	99.7

Appendix F

Leak Repairs on Mains by Material

LDCs	Unprot. Bare	Unprot. Coated	Prot. Bare	Prot. Coated	Plastic	Cast / Wrought Iron	Copper	Other
Central Hudson	21	0	0	27	3	60	0	0
Con Edison	2,182	254	0	175	86	2,059	0	0
Corning	5	3	0	2	1	0	0	0
NFG	684	0	0	101	45	44	0	4
NGrid LI	553	61	0	6	102	171	0	0
NGrid NY	204	0	0	67	15	2,018	0	0
NGrid Upstate	4	11	0	45	11	84	0	0
NYSEG	5	0	0	27	24	1	0	1
O&R	48	0	0	5	45	0	0	0
RG&E	0	0	0	90	11	0	0	1
Liberty	0	0	0	2	0	0	0	0

Appendix G

Leak Repairs on Services by Material

LDCs	Unprot. Bare	Unprot. Coated	Prot. Bare	Prot. Coated	Plastic	Cast / Wrought Iron	Copper	Other
Central Hudson	39	0	0	57	59	40	0	0
Con Edison	966	98	0	739	318	0	153	0
Corning	1	0	0	2	17	0	0	0
NFG	150	0	0	61	288	0	0	2
NGrid LI	546	37	13	3	233	0	11	0
NGrid NY	206	0	0	209	306	5	147	0
NGrid Upstate	26	73	0	63	120	5	6	1
NYSEG	13	0	0	19	116	1	0	3
O&R	93	0	0	15	123	0	0	0
RG&E	2	0	0	93	68	0	2	2
Liberty	0	0	0	1	1	0	0	0

Appendix H

Backlog of Potentially Hazardous Leaks

LDCs	2020	2021	2022	2023	2024
Central Hudson	5	1	3	0	1
Con Edison	5	5	7	6	5
Corning	2	3	2	2	1
NFG	1	2	0	0	0
NGrid LI	1	3	8	4	3
NGrid NY	13	20	10	14	14
NGrid Upstate	16	6	9	4	3
NYSEG	1	0	2	0	0
O&R	0	0	0	0	0
RG&E	0	0	3	0	1
Liberty	1	1	0	0	0

Appendix I

Repaired Potentially Hazardous Leaks

LDCs	2020	2021	2022	2023	2024
Central Hudson	170	198	184	156	177
Con Edison	5,814	6,869	5,322	5,116	4,072
Corning	54	66	39	39	9
NFG	707	839	776	696	623
NGrid LI	1,225	1,048	921	984	1,018
NGrid NY	2,168	2,399	2,745	2,782	2,930
NGrid Upstate	590	446	405	348	289
NYSEG	102	77	63	98	125
O&R	187	177	204	157	146
RG&E	132	136	141	123	111
Liberty	1	4	1	2	2

Appendix J

Discovered Potentially Hazardous Leaks

LDCs	2020	2021	2022	2023	2024
Central Hudson	158	176	172	140	157
Con Edison	2,903	3,738	2,924	2,345	2,144
Corning	49	67	45	38	14
NFG	693	831	772	694	620
NGrid LI	1,239	1,050	819	485	1,052
NGrid NY	2,129	2,317	2,367	2,543	2,195
NGrid Upstate	739	528	545	555	512
NYSEG	149	94	83	125	140
O&R	180	178	204	155	150
RG&E	178	166	198	141	143
Liberty	2	4	1	2	2

Appendix K

Backlog of Total Leaks

LDCs	2020	2021	2022	2023	2024
Central Hudson	80	47	62	40	37
Con Edison	173	137	107	103	93
Corning	45	40	32	21	12
NFG	453	297	209	115	46
NGrid LI	6,435	5,494	4,671	3,875	2,078
NGrid NY	1,944	1,779	1,627	1,485	1,052
NGrid Upstate	714	648	594	502	434
NYSEG	13	3	9	3	4
O&R	3	2	2	0	3
RG&E	10	6	12	5	6
Liberty	1	1	0	0	0

Appendix L

System Totals (Mains and Services)

Year	Steel (in Miles)			
	Unprotected		Protected	
	Bare	Coated	Bare	Coated
2015	9,313	3,141	533	18,049
2016	8,795	3,196	543	17,699
2017	7,878	3,518	338	17,832
2018	7,570	3,300	339	18,794
2019	7,073	3,331	332	17,692
2020	6,659	3,154	324	17,792
2021	6,501	3,134	320	17,713
2022	6,347	3,060	303	17,706
2023	5,958	2,968	288	17,454
2024	6,474	2,967	283	16,458

Appendix L (Continued)

System Totals (Mains and Services)

Year	Plastic (in Miles)	Cast and Wrought Iron (in Miles)	Copper (in Miles)	Other (in Miles)
2015	48,157	4,194	1,712	134
2016	50,200	4,150	1,539	109
2017	51,499	3,783	1,414	100
2018	51,970	3,570	1,355	99
2019	54,304	3,217	1,349	93
2020	55,207	2,983	1,185	92
2021	56,689	2,826	1,276	88
2022	58,006	2,664	1,268	85
2023	58,183	2,523	1,171	108
2024	59,196	2,432	1,113	95

Appendix L (Continued)

System Totals (Mains and Services)

Year	Average Service Length (in Feet)	Number of Services	System Totals (in Miles)
2015	66.15	3,143,133	85,232
2016	65.70	3,203,732	86,232
2017	65.80	3,200,736	86,361
2018	65.77	3,233,062	86,998
2019	65.79	3,248,187	87,391
2020	66.23	3,261,548	87,397
2021	66.83	3,294,803	88,546
2022	68.00	3,284,900	89,439
2023	66.64	3,289,951	88,654
2024	66.73	3,298,315	89,017

Appendix M

High Risk Non-Compliances Identified through Audit Process

LDCs	2019	2020	2021	2022	2023	# of OHQs
Central Hudson	14	5	9	13	5	5
Con Edison	27	30	3	17	47	5
Corning	34	13	12	7	47	1
NFG	57	56	26	76	32	9
NGrid LI	13	11	0	11	14	2
NGrid NY	5	24	51	75	21	2
NGrid Upstate	38	74	17	164	43	11
NYSEG	79	338	64	229	103	13
O&R	2	5	12	3	2	2
RG&E	57	52	17	23	49	1
Liberty	8	2	5	24	20	1

Appendix N

Other Risk Non-Compliances Identified through Audit Process

LDCs	2019	2020	2021	2022	2023	# of OHQs
Central Hudson	6	124	0	6	2	5
Con Edison	5	97	1	38	187	5
Corning	30	32	16	24	51	1
NFG	92	243	55	10	16	9
NGrid LI	4	79	0	32	0	2
NGrid NY	5	61	17	17	40	2
NGrid Upstate	121	117	29	17	30	11
NYSEG	66	109	345	32	89	13
O&R	0	37	10	7	0	2
RG&E	15	13	106	9	100	1
Liberty	9	4	1	14	11	1