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Consolidated Edison Company of New York Gas Emergency Response Plan ("Gas ERP")

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1.0 INTRODUCTION

The Gas Emergency Response Plan ("ERP" or "the Plan") outlines the Consolidated Edison Company of New York, Inc. ("CECONY" or "Company") Gas Operations' response to all emergencies affecting the Company's gas transmission and/or gas distribution systems.

CECONY Gas Operations is responsible for the management and oversight of a 660 square mile gas franchise area, with over 4,300 miles of gas mains supplying over 1 million customers.

The Gas ERP and all of the referenced materials will be maintained on the Company's intranet. A printed copy of the Gas ERP along with all of the referenced materials will be available in the Gas Emergency Response Center (GERC), Alternate GERC (Rye Service Area), and Gas Operations workout locations for reference in the event the network is unavailable.

1.1 Purpose

This document provides planning and response guidance to all groups within Gas Operations ("Gas Ops") that have responsibilities during a gas emergency, as well as other organizations and personnel that will be expected to support or enhance a gas emergency response.

Existing Gas Ops procedures and protocols will not be altered and will drive the fundamental principles of the gas emergency response procedures described in this document.

During <u>any</u> emergency, the Company prioritizes safety from the initial response through restoration of service. In addition to operational objectives and procedures, this Plan reinforces CECONY's strategies for keeping its employees, first responders, and the public safe during a gas emergency.

1.2 Application

Responding to emergencies is the responsibility of all members of Gas Operations, and response operations may be required regardless of the incident classification level. Emergency assignments are not limited to current Gas Operations employees, as they may include employees previously trained in Gas Operations.

Emergency incidents covered by this plan may include, but are not limited to: LNG/HP compressor event, tunnels event, distribution and/or transmission event, water in gas main, building explosion, gas main / service fire, loss of supply, cyber event, security event, and over pressurization.

The response to emergencies involving other corporate infrastructure such as Substations, and/or System and Transmission Operations equipment co-located with Gas Operations facilities, are <u>not</u> covered by this Plan.

1.3 Regulatory Requirements

This Gas ERP meets the requirements of <u>16 NYCRR – Part 255.615</u> Emergency Plans, which states, "Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency."

The Plan shall be updated annually to meet the requirements of 16 NYCRR - Part 255.603 (b), which states that the Plan "must be reviewed and updated by the operator at intervals **not exceeding 15 months**, but **at least** once each calendar year."

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2.0 ORGANIZATIONAL OVERVIEW

Gas Operations is made up of two main sections – Gas Operations and Gas Engineering. Both groups are responsible for the safety, reliability, and integrity of the gas distribution system in Manhattan, The Bronx, the 1st and 3rd Wards of Queens, and most of Westchester County.

There is also a Gas Compliance and Quality Assessment group that reports directly to the Senior Vice president of Gas Operations. Additionally, the Environment, Health, and Safety ("EH&S") group provides support by helping ensure the safe operation and management of the gas system.

2.1 Gas Operations

Gas Operations consists of five major operating departments: Gas Construction, Distribution Services, Work Management, Technology Support, and the Gas Emergency Response Center (GERC).

The following is a summary of each group's responsibilities during both routine operations and emergencies:

Table 1: Area Gas Operations - Department Roles and Responsibilities

Department	Primary Responsibilities	
Gas Construction	Perform and oversee the maintenance activities and new construction on the gas distribution system	
	Leak repairs	
	Capital main replacement programs and new business installations	
Distribution Services	Gas leak response and investigation	
	Carbon monoxide investigation	
	Gas Methane Sensor Alerts	
	Leak surveillance and re-checks	
	Issuance of warning tags	
	Inside leak repairs, where applicable	
	Repair follow-up investigations, in addition to PSC-mandated inspections of buildings of public assembly, main valves, service regulators, submarine crossings, and gas mains on bridges and tunnels	
	Periodic exchange of meters as required by the PSC	
	Installation and turn-on of new business meters	
Work Management	Provide administrative support for the Gas Distribution Services and Gas Construction sections, including:	
	 Schedule and monitor the department's activities to ensure compliance with all federal, state, and local regulations 	
	 Monitor the department's operating budget and the correlation of financial and productivity information to improve overall work performance 	

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		<u> </u>	
		 Schedule gas leak repairs, surveillances, follow-up inspections, capital and maintenance projects, and information entry into various Corporate and Gas- specific computer applications 	
		 Conduct Automated Roster Callout System ("ARCOS") drills for the loss of Gas Operations Supervisory System ("GOSS") 	
Technology Support		Support the Gas Operations computer technology needs, including hardware and software development and maintenance	
		Identify, develop, and implement efficient data collection methods, timely analysis, and report to the organization, as needed	
		Implement and maintain the enterprise gas work and asset management system	
	•	Emergency Functions: Business Continuity	
Gas Emergency Response Center (GERC)		Coordinate emergency response efforts associated with incidents on the gas system	
		Make notifications to agencies when applicable per G-11850 (i.e., PSC, DOT/RNC, DEP)	
		Immediate and direct notification to the appropriate public safety answering point (i.e., FD, PD, and other public officials)	
		Immediate and direct notification to the appropriate public safety answering point due to potential ruptures to natural gas pipe, and other safety-related concerns to minimize hazards of release of gas to life, property, or the environment	
		Timely prioritize, dispatch, and provide emergency response to reported gas leak emergencies and non-emergency work within CECONY's gas service territory, encompassing Manhattan, The Bronx, the 1st and 3rd Wards of Queens and most of Westchester County	
		Activate the <u>Gas Operations Situation Room</u> during Serious or greater level Incidents, if required	
		GERC's Emergency Response Group (ERG) will establish and maintain liaison with the appropriate responding public safety agencies (i.e., FD, PD, and other public officials)	
	•	Gas ERGs will establish the Incident Command Structure	
		Receive notifications of potential rupture and dispatch emergency response personnel to evaluate whether the notification is an actual rupture or non-rupture event.	

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2.2 Gas Engineering

Gas Engineering is made up of four major departments: Distribution Engineering; Transmission Engineering; Technical Operations; and Project Management / Customer Programs.

a. Distribution Engineering / Transmission Engineering

Distribution Engineering / Transmission Engineering is responsible for distribution and transmission system planning, reliability, and contingency planning. It provides engineering for new business services and mains, major project design and field engineering, mapping, standards, procedures, and annual steel and cast iron replacement programs, including system reinforcement and encroachment replacements.

It also develops isolation plans and reviews system designs to minimize the effects of isolation on customers and the makeup of the customers, such as hospitals, schools, commercial, and industrial users that would be affected, the time required for available personnel to carry out isolation procedures, the time required for controlling the pressure in the isolated area by such means as venting and transferring gas to adjacent systems, and the time required for available personnel to restore service to the customer.

When establishing valve locations, numerous factors are considered including the size of area to be isolated, topographic features, such as rivers, major highways and railroads, and the number of valves necessary to isolate the area.

Isolation plans are reviewed after incidents to ensure that all factors are continuously re-evaluated. It influences regulatory activities with respect to gas safety compliance, specifies interruption parameters, and issues gas safety and construction standards. It oversees transmission and distribution integrity management programs. It approves new materials and methods and acts as principal witness on gas capital budget and rate case operations issues. It maintains and disseminates information on key issues such as contractor damage, service availability, replacement of leak-prone pipes, and other critical system data.

During an outage of the GOSS, Gas Engineering provides technical support (including system modeling) in identifying potential areas of concern and assisting in data collection, and evaluation of field data, that is reported back to Gas Control by field personnel.

There are four operational sub-groups within Distribution Engineering / Transmission Engineering with the following responsibilities:

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Table 2: Distribution Engineering / Transmission Engineering – Department Roles and Responsibilities

Group	Primary Responsibilities	Emergency Functions
Pressure Control	 Operate and maintain gas distribution regulator stations and industrial regulators Install and maintain Supervisory Control and Data Acquisition (SCADA) and Supervisory Control devices that transfer data to Gas Control and GOSS Activities include inspections, chart changes, pressure adjustments, repairs, capital improvements, new installations, operations, and maintenance and oversight of key transfer facilities such as metering stations, gas heaters, as well as the maintenance of all Remote Operated Valves (ROVs) 	Provide field support for operating and maintaining supervisory control regulating stations and pressure monitoring locations affected by the loss of the GOSS
Gas Control	Operate the Company's gas transmission and distribution systems Monitor interstate pipelines to	Remotely isolate impacted sections of the system during a
	maintain a safe and reliable gas system	catastrophic incident Initiate and manage the response to a
	Monitor and control the delivery of gas into the Con Edison service territory	GOSS outage
	Monitor excavation activities in the vicinity of gas transmission mains	Maintain the procedure for actions to be taken in the
	Identify / initiate contingency plans	event of loss of
	Forecast the gas distribution load Assure adequate system pressures	communications with GOSS SCADA
	exist to meet customers' needs	equipment Maintain a list of the
	Interface with National Grid to maintain the New York Facilities System	emergency contacts required for support of the gas system
	 Operate the Hunts Point Compressor Dispatch supply from peak shaving facilities, such as the Astoria LNG plant 	during a GOSS outage
		Communicate with supporting
•	Identifies system conditions which are considered notifications of potential rupture, and relay such information to the GERC	departments and external organizations during a GOSS outage

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Gas Development Lab	Perform acceptance testing for new materials and methods	Business Continuity
	Provide support for gas related R&D projects, as needed	
	Perform facility failure and investigations on failed materials, emergency field repairs on plastic mains, unusual plastic tapping, internal camera inspection, and inspection and maintenance of Company and contractor fusion equipment	

b. <u>Technical Operations</u>

Table 3: Technical Operations - Department Roles and Responsibilities

Group	Primary Responsibilities		
Corrosion Control	Corrosion control-related engineering and testing of Con Edison's buried and submerged metallic facilities		
	 Performs periodic tests of protected gas mains, electric feeders, and structural facilities 		
	Investigates faults		
	Issues work orders for correction		
	 Supports new installations of gas mains, feeders, and structural facilities 		
	Designs cathodic protection systems		
	Tests and approves new coatings and corrosion-related material		
	Provides corrosion-related training		
	Performs external corrosion direct assessments for transmission main pipeline integrity		
	Partners with R&D on corrosion-related projects		
Gas Measurement	Performs gas meter engineering		
	 Completes gas meter testing and purchasing of meters, regulators, and correction devices for Con Edison and Orange & Rockland Utilities 		
	 Designs meter and regulator sets and maintains associated standards 		
	Coordinates meter repair and refurbishment done by vendors		
	Performs acceptance and complaint testing of meters		
	Administers the Gas Meter Asset Management System ("MAMS")		
	 Installs and maintains remote automatic meter reading devices used to monitor interruptible / transportation customer hourly gas usage 		

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	 Installs, inspects, and maintains electronic volume correctors Identifies and integrates new gas measurement and pressure regulation technologies
Leak Survey	 Perform annual leak surveys of the Company's 4,300 miles of gas mains and periodic surveys of approximately 380,000 services
	 Performs high-speed cast iron surveys during extreme weather conditions and special surveys, as needed
	 Conducts visual inspections of aboveground gas service piping for atmospheric corrosion
	Performs leak investigations immediately after an incident that may have impacted the gas system
Tunnel	Performs maintenance of the Company's eight major utility tunnels
Maintenance	Responds to any gas incident within a tunnel
LNG (Liquefied Natural Gas) Plant	Operation and maintenance of the Company's Liquefied Natural Gas ("LNG") Plant and the Hunts Point Compressor Station

c. Project Management / Customer Programs

Table 4: Project Management / Customer Programs – Department Roles and Responsibilities

Group	Primary Responsibilities	Emergency Functions
Project Management & Customer Programs	 Financial, Engineering and Operational oversight for major programs including Main Replacement, Transmission, LNG modernization, and Third-party inspections for plastic fusion Management of customer-facing programs including Customer Connections, Service Line Inspections, Natural Gas Detector Installations, and the Interruptible Customer Program 	Various (includes CERC positions, logistics support, municipal liaison assignments, wire guards, customer response/communication, business continuity and support during the loss of GOSS)
	Activities include preparation of budgets, coordination with TIMP and DIMP, preparation of work schedules, coordination with external stakeholders, coordination with internal stakeholders, customer interaction/education/response/issue resolution, and inspections of company and customer equipment	

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2.3 Gas Compliance and Quality Assessment (GCQA)

GCQA is a group within Gas Operations that reports directly to the Senior Vice President of Gas Operations. It is comprised of four groups: Quality Assurance; Quality Control; Compliance; and Regulatory Programs, which have the following responsibilities:

- a. Quality Assurance performs reviews of procedures and processes to assess compliance with applicable codes and regulations. It recommends and tracks process improvements and corrective actions that result from these reviews.
- Quality Control conducts field inspections of gas work to verify specification compliance, as well as providing additional oversight of quality of workmanship. It is responsible for the plastic fusion sampling plan and subsequent remediation efforts.
- c. **Compliance** supports day-to-day compliance through the interpretation of existing regulations and planning changes to meet regulatory changes. It is also responsible for assisting Operations with PSC audits and coordinating the CEO Certification Program.
- d. Regulatory Programs support compliance through the project management of regulatory changes and the interpretation of existing regulations. It is also responsible for managing the Operator Qualification Program and lending expertise to other regulatory-driven programs.

2.4 Environment, Health, and Safety ("EH&S") Operations - Gas

The EH&S group supports Gas Operations in their efforts to achieve a **zero-harm work environment** while complying with federal, state, and local regulations, as well as with Company policies and procedures.

The group is responsible for the following:

- Disseminates pertinent EH&S information to operating personnel
- Provides EH&S field support and technical expertise. EH&S personnel respond to environmental and safety-related incidents and concerns, in addition to addressing health-related issues
- Coordinates labor-management committees to resolve EH&S concerns
- Manages multiple safety and environmental programs
- Maintains statistical information for a range of EH&S-related areas
- Manages employee recognition programs

All accidents, injuries, and environmental incidents shall be reported to the EH&S Control Desk at

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3.0 EMERGENCY RESPONSE OBJECTIVES

This section identifies operational objectives to be met during an incident that affects gas systems and the strategies that will be used to meet those objectives.

The Incident Commander will prioritize these objectives, based on the nature and extent of the incident.

In general, the following overarching principles should be applied to every emergency response to reasonably assure the safest and most prudent operation:

- Prioritize the safety of responders and the public; stabilize condition of gas system
- Manage a coordinated response effort:
 - Communicate with local first responders (e.g., fire and police departments) to provide for effective utilization and coordination of local responder personnel and equipment with utility resources
 - Communicate and coordinate with other gas and electric utilities in situations that may involve or affect CECONY gas facilities (i.e., NYSEG, National Grid, etc.)
- Maintain the capability to expand all functions under the Incident Management System to meet any size of emergency
- Restore Gas Operations customers and provide recovery from the incident
- Maximize protection of critical and sensitive areas / customers
- Keep stakeholders and public informed of response activities; make necessary regulatory notifications
- Provide the necessary resources to meet all the needs for the incident, including ordering resources through appropriate procurement authorities
- Maintain current contracts with the business community, and other vendors who can supply resources and commodities during an emergency
- Maximize protection of life, property, and the environment
- Minimize economic impacts
- Contact Gas Control when emergency conditions exist AND associated field changes are made, which effect control room operations.

Additionally, emergency response guidance can be found in Gas Operations' Risk Assessment Guides for both transmission and distribution events, and procedures for responding to a coastal storm may be found in the Gas Operations' Coastal Storm Plan, and Cl 260-4: Corporate Response to Incidents and Emergencies.

3.1 Investigate Impacts to Gas System

The first step that is taken in response to an emergency that may have impacted, or been caused by, the gas system is an investigation.

Upon notification of a potential incident, the GERC will send trained gas responders to the reported emergency location to determine the extent of damage or impact, if any, to the gas system. This may include, but isn't limited to:

Leaks

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- Gas outages
- Pipe damage
- Pressure problems
- Distribution problems
- Transmission problems
- Notifications of potential rupture

3.2 Make Safe

During incidents that impact Gas Operations, the safety of responders and the general public, and the protection of Company equipment, is the responsibility of all personnel.

If an investigation indicates the gas system has been impacted, this section identifies potential actions that may be taken, depending upon the nature of the incident, to make the system safe and minimize risks to life and property.

A condition is considered "made safe" once a positive physical action has been taken to eliminate the threat to life and property [e.g., venting a manhole with Type 1 readings and buildings are clear (e.g., no gas readings), securing a damage and determining the buildings are clear, closing a valve].

a. Investigate a Suspected or Confirmed Leak

Once it is determined that a leak is present at the scene of an emergency, it requires immediate and continuous action until the hazard is eliminated. Responders will follow procedures outlined in Gas Specifications G-11809 and G-11837, as appropriate.

Initial activities performed by GDS, ERF, Gas Construction, or Leakage Survey will determine the extent (or migration) and classification of a gas leak.

G-11809: "OUTSIDE GAS LEAK REPORTING, CLASSIFICATION, SURVEILLANCE, REPAIR AND FOLLOW-UP INSPECTION" provides guidelines and requirements for processing outside gas leaks from the time they are reported or discovered through their classification, surveillance, repair, and follow-up inspection.

G-11837: "INVESTIGATION OF AN INSIDE GAS LEAK OR ODOR CALL AND ISSUANCE OF A WARNING TAG" describes the actions required for investigating inside gas leaks or odor complaints and, where an unsafe condition is found, to make safe, and to make customers aware of such conditions on interior gas piping and appliances beyond the outlet of the meter set assembly.

b. <u>Isolate Affected Area(s)</u>

As soon as practical, the effect(s) of a gas outage should be kept to a minimum by various methods, which may include:

- (1) For a classified gas outage (confirmed):
 - Valve closures (valves that are closed should be locked)
 - Cut and cap mains (contact EH&S for any fluids found in gas mains)
 - Stopper installation
 - Close regulator station supplies

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- Isolate buildings and verify shutdown (close and lock curb valves and/or service head valves, cut and cap service)
- Utilize available R&D methods (e.g., Froth Pak, EZ Valve, EMSOS)
- (2) For an over-pressurization incident:

Since there are different levels or severities of over-pressurized mains (15" WC to 20 PSIG, etc.), there are different approaches that may be taken relative to evacuations and shutdowns. Gas Specifications G-4905, G-4530, G-4539 provide guidance on when to potentially shut down a regulator station or consider evacuations.

In general, the following steps shall be taken for any suspected or confirmed incident that involves an over-pressurization:

- Gas Engineering System Planning will identify scope of area involved
- GDS will perform safety checks in at least 10% of services / buildings involved (to check for leaks and test appliances in the affected areas)
- Leak Survey shall perform mobile and walking survey in the affected area(s) identified by Gas Engineering System Planning
- Cut and cap mains, only where it can be safely done after valve closure

c. <u>Declare a Code Multiple Resource Response Event ("MuRRE")</u>

The GERC will initiate a Code MuRRE for events that require an escalated response. The response includes assistance from additional Company resources and the local fire department as outlined in Gas Specification <u>G-11845</u>: <u>Gas Emergency Liaison</u>, <u>Training and Response with External Public Safety Agencies</u>. Local supporting agencies will be trained on gas leak investigation, based on Gas Operations specifications <u>G-11809</u> and <u>G-11837</u>.

d. Coordinate with First Responders

Specification <u>G-11845</u> describes the liaison, training, and response requirements for managing gas emergencies with external public agencies. Once local first responders are notified of an incident impacting the gas system, the following response may be expected.

(1) In NYC:

Based on an incident scope and need, the Fire Department of New York ("FDNY") responds to a call of a gas odor / leak (Code MuRRE) with the appropriate level of resources, including gas metering and responders with Hazardous Material training.

(2) In Westchester County:

Westchester County has career and volunteer fire departments. The various fire departments in Westchester County follow the National Fire Protection Association ("NFPA") guidelines for response to natural gas emergencies, including, but not limited to, NFPA 54 and NFPA 56.

Should additional resources be required, all fire departments in Westchester have mutual assistance agreements in place to provide the necessary resources to

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respond to these events. Training and exercises are done with all fire departments in Westchester County to familiarize them with the various response procedures for gas incidents.

(3) Police Response and Equipment:

Police departments in New York City and in Westchester County respond, as requested, to assist in evacuations, provide site security, traffic control, and to assist in gaining access to buildings.

3.3 Determine Scope of Impacts

a. Identify Affected Areas

If an incident involves a large-scale gas outage, the extent of the outage (boundaries and customers affected) needs to be determined as best as possible to begin development of a restoration plan, and to request the appropriate number of responders (including mutual assistance).

Methods to determine the geographic boundaries of any outage may include, but are not limited to, the following:

- · Engineering assessment of distribution system
- Customer calls (incoming)
- GOSS Points

Available methods / systems to determine affected areas / customers may include the following:

- Stoner
- Area Profile System
- CIS (Customer Information System)
- BOPA (Building of Public Assembly) lists (Data Warehouse)
- EMOPSYS (Emergency Operating System Electric)

b. Identify Critical and Sensitive Customers

It is imperative that critical and sensitive customers be determined to establish priority for restoration. <u>Corporate Instruction 260-2: Incident Reporting</u> provides guidance on how and when impacts to critical customers must be reported to CIG.

Company organizations that may be involved in identifying critical and sensitive customers include:

- Gas Operations
- Customer Operations
- Corporate Affairs
- Energy Services
- Government Relations

Facilities considered critical or sensitive include the following:

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Critical Customers	Sensitive Customers
Hospitals	NYCHA and Municipal Public
Nursing Homes	Housing Developments
Schools	Prisons / Jails
Daycare Centers	Government Buildings
 Customers with gas heating (winter 	Stock Exchange Buildings
months) or water heating vs. cooking only	Religious Buildings
 Customers with life-sustaining equipment 	Museums
Clinics	Hotels
Sewage Treatment Plants	Restaurants
Water Supply Facilities	Research Institutions
Homeless / Displaced Shelters	Any location deemed "Critical" by
Warming Shelters	NYCEM or WCDES
Polling Places (during election period)	

c. Potential Ruptures

Upon dispatch to a potential rupture location, the emergency responder should determine, as soon as practical, whether the potential rupture is an actual rupture event, or a non-rupture event, and report this information back to the GERC.

Actual ruptures are unintentional or uncontrolled releases of a large volume of gas from a pipeline (typically from, but not limited to, a transmission pipeline). Indications of a rupture include signs of an exposition directly from the pipeline, or a pipeline break caused by the pipeline walls' inability to contain the pressure held within.

If a rupture is determined, the emergency responder should immediately inform the GERC, whom would then make proper notifications to Gas Control and other pertinent organizations.

3.4 Make Notifications

All incident notifications and internal communications will be made through the Gas Emergency Response Center ("GERC"). Communication between the GERC and the onscene command post will be coordinated through the Communicator while working through the Incident Command System ("ICS") structure. In the event of any Serious or Full-Scale Classification incident the GERC shall notify Facilities and Field Services, as soon as practical, to ensure that logistical resources can be coordinated and quickly deployed.

a. Communication Plans

<u>Corporate Instruction 260-2: Incident Reporting</u> specifies procedures and establishes criteria for reporting incidents to System Operation's Central Information Group ("CIG").

CIG is responsible for making all corporate-wide notifications, as per established Central Information Dashboard scenarios, as well as making all notifications to appropriate off-site organizations (e.g., city, state, and federal agencies) as dictated by the incident and established procedures, and regulatory requirements. CNS notifications are incident-specific and will include an incident classification, if an ICS structure has been established.

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Gas Specification G-11850: Reporting Natural Gas Incidents, Evacuations, Major Service Disruptions, Exceeded MAOP and Carbon Monoxide Incidents provides instructions for Gas Operations to follow for reporting natural gas incidents that may occur on the distribution and transmission pipelines.

Exhibits 1, 2, 4, and 5 in G-11850 list various types of incidents that require immediate notification to the New York State Public Service Commission ("PSC"), United States Department of Transportation ("DOT") / National Response Center ("NRC"), and/or New York City Department of Environmental Protection ("DEP"). Additionally, there is guidance throughout the document on when to notify other appropriate government agencies (e.g., FDNY) for various conditions or incidents (e.g., elevated carbon monoxide readings, gas leaks, or explosions) to provide situational awareness, comply with all regulations, and reasonably ensure the safety of the public.

b. Communicating with the Public

Corporate Instruction 810-2: Corporate Affairs' Crisis Communications Plan describes the Company's plan to "provide timely and accurate information through the news media to the public, elected officials, and community organizations on system events or issues that could, or have, affected electric, gas, and/or steam service, disrupt municipal services, have an impact on the environment, or otherwise have an impact on customers in the CECONY service territory."

The Director of Corporate Communications may assign technical advisors to the GERC and / or other appropriate control centers upon implementation of this Plan.

3.5 Classify Gas Incident

Gas distribution events are classified as per <u>Corporate Instruction CI 260-4</u>, "Corporate Response to Incidents and Emergencies" ("CI 260-4") (see Table 3.5A) and applies to any gas emergency, including but not limited to: LNG / HP compressor event, tunnels event, distribution and/or transmission event, water in gas main, building explosion, gas main / service fire, loss of supply, cyber event, security event, and over pressurization.

For a large-scale gas outage, Gas Operations may use the parameters in Table 3.5A to guide the incident classification level determination, as well.

The response to incidents within Gas Operations is the primary responsibility of the operational unit in which the incident occurs. Individual operational units are responsible for mobilizing resources to respond to all incidents. These resources include the Emergency Response Group, and other sections of Gas Operations.

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Table 3.5A: Incident Classification Level Based on Gas Outages

		Nui	nber of Outag	es ¹
Incident Classification Level	Definition	Private – Residential Homes (per unit)	Apartments	Composite (mixed²)
Routine	An incident that is managed by the responsible operating organization, generally using locally assigned resources.	0 - 50	0 - 200	< 200
Upgraded	An incident requiring more than locally assigned resources.	50 - 400	200 - 1,600	200 - 1,600
Serious	An incident that involves a regional response of assigned crews diverted to the incident scene with Corporate support, as needed. There may be a need for support from outside the Company (commonly referred to as mutual assistance) at this level.	400 - 1,000	1,000 - 4,000	1,000 - 4,000
Full–Scale	An incident that involves widespread need for Company forces in one or multiple service areas and which could include support from outside the Company.	> 1,000	> 4,000	> 4,000

3.6 Establish Incident Command Structure

Corporate Instruction CI 260-4 ("CI 260-4") establishes guidelines for determining the appropriate level of response, and mobilizing the appropriate Company and external resources (e.g., first responders) in a timely manner in response to an incident. It incorporates the directives of numerous corporate planning documents, as well as Gas Operations' procedures and emergency response strategies identified in this Plan.

As per CI 260-4, the Incident Command System ("ICS") is designed to enable safe, effective, and efficient incident management by integrating a combination of facilities, equipment, personnel, procedures, and communications operating within a common organization structure.

For more general information on ICS and its application within the Company, see CI 260-4. This document, in conjunction with G-11809 and G-11837, provides a comprehensive

² Composite means a mix of private / residential and apartments. Multiply resident homes (units) by 4 and add to apartment amount.

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understanding of how the Company organizes itself in a safe and coordinated manner during a gas emergency.

a. Incident Command

Incidents occurring within the operating area of Gas Operations will have an Incident Commander ("IC") assigned from Gas. Command and General Staff assignments will be filled by representatives from the affected Gas section.

The ICS will be used as the sole incident management system during emergency response events. This will help ensure that communication both within the Company, and externally, is clear, effective, and timely. The IC is responsible for developing and implementing an appropriate ICS structure for all emergency responses.

The initial IC shall be trained and authorized to assume the role of IC. A non-HAZWOPER qualified IC may utilize a HAZWOPER qualified Operations Section Chief during Haz-Mat incidents. The IC shall classify the level of the incident, and determine the size and scope of the incident command structure required to respond to the incident.

During Serious or Full-Scale level incidents that progress to a CERC (Corporate Emergency Response Center) activation, the on-scene IC will transition to the role of on-scene Operations Chief. Incident command authority may be transferred to the highest ranking, and appropriately trained, Gas representative in the CERC. This duty may be delegated to a lower title at the discretion of management.

b. Coordination and Field Response

The GERC coordinates emergency response efforts associated with incidents on the Company's gas transmission and/or gas distribution systems and implements ICS. The GERC is responsible for notifying appropriate federal, state, or local agencies regarding gas distribution system status.

The GERC will serve as the first point-of-contact for requests for mutual assistance from other companies. The Gas Operations Situation Room ("GOSR") may be located at the GERC during Serious Incidents.

The Emergency Response Group ("ERG") assists in the initiation and set-up of the ICS, including the establishment of a formal Incident Command Post ("ICP"). The group will act as the initial Communicator / Scribe until relieved by appropriately trained personnel.

The ERG will also act as the liaison to municipal public safety agencies, including but not limited to, police, fire, public works, and other utility companies until the arrival of representatives from Emergency Preparedness.

c. Gas Operations Situation Room ("GOSR")

Upon the declaration of CERC activation, or other Serious or Full-Scale Incidents, Gas Operations will open the GOSR, located in the GERC conference room, in . The GOSR will support the operations of a Serious-level gas incident or Full-Scale CERC-activated event. The Gas Operations Situation Room Guide provides guidance on when to activate the GOSR, and outlines roles and responsibilities of employees designated to staff the GOSR.

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d. Corporate Emergency Response Center ("CERC")

Senior leadership in CECONY (i.e., Senior Vice President of Operations, Vice President of Gas Operations, and Vice President of Emergency Preparedness) may choose to activate the CERC for incidents classified as Full-scale or when two or more regions go into Serious condition to support and / or manage a gas emergency in coordination with the GERC.

The CERC is used to coordinate the emergency response / restoration amongst the regions, and with other utilities, as needed. The CERC may be located at or any other location deemed necessary to provide strategic management of an incident. For more information about the CERC see CI 260-4.

3.7 Acquire and Manage Resources

a. Mutual Assistance

This section describes the process by which mutual assistance may be acquired ("Requesting Company") or furnished ("Responding Company") after ICS is established. Mutual assistance may be in the form of personnel, supplies, and / or equipment and may be required to mitigate, repair, or restore the gas system to normal operations.

The Company shall utilize local resources as conditions dictate, and, for certain Serious or Full-scale incidents, it may be determined that mutual assistance is required. For events that are short, local / regional (e.g., intra-company, surrounding utilities), mutual assistance will be canvassed first. If local / regional support cannot be furnished, or for larger events (e.g., coastal storm), the request can be escalated in accordance with *Exhibit A - Gas National Mutual Assistance Agreement*. This Mutual Assistance Agreement was jointly developed by The American Gas Association ("AGA"), the American Public Gas Association ("APGA"), the Northeast Gas Association ("NGA"), the Southern Gas Association ("SGA"), and the MEA Energy Association ("MEA"), for signatory companies to request and provide emergency assistance in the form of materials, personnel, supplies and/or equipment, to aid in restoring natural gas service when it has been disrupted and cannot be restored in a safe and timely manner by the affected company or companies alone. The Company is a signatory to the agreement, and its term is from Jan. 1, 2021 through Dec. 31, 2025.

Should an event be of a magnitude that requires utilization of the Gas National Mutual Assistance Agreement, <u>Emergency Preparedness - Support Services and Preparedness</u> will complete the Request for Assistance ("RFA") form in <u>Exhibit A</u>.

The Emergency Preparedness - Support Services and Preparedness department, in coordination with Gas Operations, will facilitate the mutual assistance process and provide advice and counsel on the mutual assistance process and agreements. Emergency Preparedness serves as the liaison between the Company and the Responding / Requesting Company, throughout the mutual assistance lifecycle.

Requesting Mutual Assistance - "Requesting Company"

The following describes, in general, the initial responsibilities of key organizations / roles when the Company requests mutual assistance. A detailed checklist can be found in Exhibit B.

When it is determined that mutual assistance is required:

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- The Incident Commander, Planning Section Chief, GERC, or delegate will contact the Emergency Preparedness - Support Services and Preparedness department to initiate the request.
- Emergency Preparedness will coordinate with the GERC, Planning Section Chief, or delegate to determine the level (local / regional, surrounding utility, National Mutual Assistance Agreement) and type (personnel, equipment, supplies) of mutual assistance needed, and to ultimately fulfill the request. Note: Requests for personnel shall only be fulfilled under the Operator Qualification requirements of Con Edison's Operator Qualification Written Plan.
- Upon the request being fulfilled, Emergency Preparedness will obtain the Responding Company roster (including individual's operator qualifications), and provide that to the Incident Commander, Planning Section Chief, the GERC, and any other groups requiring this information.
- The Planning Section Chief will document and maintain the status of the response effort and any projected requirements; maintain the status of all resources involved; and provide engineering and technical support, as necessary.

Per Company policy, and federal and state regulation, records must be retained pursuant to Corporate Instruction CI-870-1: Records Management.

The Company maintains a Records Retention Schedule as the official repository for gas records retention requirements.

- The Planning Section Chief, in conjunction with Emergency Preparedness, shall develop and implement a demobilization plan as early on as possible.
- Environment, Health, and Safety, as necessary, and in coordination with The Learning Center, will provide training and / or safety briefings. <u>Exhibit C – Mutual</u> <u>Assistance Onboarding (Training for Responding Company)</u>
- Gas Operations will provide required Operator Qualification tasks necessary to support mutual assistance. In the event an external resource has operator qualifications that are not currently accepted by Con Edison, Gas Operations must review and accept (or develop an alternate training and / or qualification) prior to that resource beginning work.
- Mutual Assistance resources training and operator qualification records must be maintained as part of the incident documentation.
- Facilities and Field Services Emergency Support Group (or Logistics Operations Control Center ("LOCC") when mobilized) will coordinate and manage logistical needs (e.g., lodging, meals, and site-specific logistical needs).

Furnishing Mutual Assistance – "Responding Company"

The following describes, in general, the initial responsibilities of key organizations / roles when the Company responds to the request mutual assistance. A detailed checklist can be found in Exhibit B.

Requests for mutual assistance may be received by Emergency Preparedness or the GERC through the National Mutual Assistance Agreement, or directly from another utility. In cases where the GERC receives the request directly, Emergency Preparedness should be notified as soon as practicable.

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Note: While Emergency Preparedness facilitates the mutual assistance process, the GERC may coordinate a local (intra-company) response during emergency situations. In this case, Emergency Preparedness should still be notified, especially if additional support or supplemental assistance is needed.

When a mutual assistance request is received, Emergency Preparedness will coordinate the response:

- Determine specific needs of the Requesting Company:
 - Type / amount of mutual assistance requested (personnel, equipment and / or supplies)
 - o Tasks to be performed
 - Training and Operator Qualification requirements
 - Timeframe needed by and expected duration
 - Other special conditions/requests
 - Logistical information
- Coordinate with the GERC and / or other managing areas to determine if the request can be fulfilled based upon current needs of the operating area to maintain normal operations.
- Upon confirmation that Con Edison can provide assistance:
 - Emergency Preparedness will respond to the request; provide the "Mutual Assistance Participant Expectations" document (<u>Exhibit D</u>) to the area's managers; Managers will distribute the "Mutual Assistance Participant Expectations" document (<u>Exhibit D</u>), canvass for volunteers (Operator Qualification qualified only, if required), and provide a completed roster to Emergency Preparedness
 - Emergency Preparedness will provide the Requesting Company with the roster, and verify travel location and point of contact
- Facilities and Field Services Emergency Support Group will coordinate and manage the logistical needs of the travelling personnel while in route (e.g., lodging, meals, and site-specific logistical needs).
- b. New York Utilities Material Sharing Group ("NYMSG")

The NYMSG was established in accordance with the <u>PSC's November 19, 2013 Order Instituting a Process for the Sharing of Critical Equipment (Case 13-M-0047)</u>. Participating companies agreed to establish a warehouse network to stockpile key materials and equipment to share as outlined by the group's governing principals / procedures.

In the event that material or equipment cannot be obtained through traditional sources, the Logistics Section Chief will request the designated NYMSG Company representative to initiate the NYMSG Protocol.

As a participating company, CECONY adheres to the procedures and protocols developed by NYMSG, including attending meetings and drills, participating in storm conference calls, and providing materials to requesting members whenever possible.

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Emergency Preparedness will facilitate this process.

c. NGA / National Mutual-Aid Annual Simulation Exercise / Discussion

Emergency Preparedness, in conjunction with Gas Operations, will participate in and / or host the annual NGA / National Mutual Aid Simulation Exercise, or discussions. This Exercise, or like discussions, bring together representatives from neighboring utilities to coordinate, discuss, and approve upon the Mutual Assistance process, including ensuring the Operator Qualifications are consistent with NYS and Con Edison standards.

3.8 Develop Restoration Plan

It is critical that the Estimated Time of Restoration ("ETR") is determined as soon as practical after a large-scale gas outage. Quickly determining appropriate staffing levels will facilitate the creation of the ETR. It is also important to identify customers that can safely have gas service restored to efficiently deploy resources.

The staffing matrix in <u>Attachment IV.(i.)</u> provides estimated guidelines for determining resources needed relative to outage numbers. Actual resources utilized may vary based on a number of variables. The Gas Operations Specification for restoration of all outages can be found in <u>G-11836 Integrity Tests</u>, <u>Meter Turn-Ons</u>, <u>Meter Turn-Offs</u>, <u>Meter Exchanges</u>, and <u>Restoration of Gas Service After Repairs</u>.

a. <u>Develop Staffing Plan</u>

Staffing should include both Company and mutual assistance resources. The Company must identify any training and qualification requirements (e.g., Con Edison task specific and EH&S / Gas Operations requirements for mutual assistance) that must be met before deploying any personnel. Gas Operations will prepare work packages and staging areas so crews can be utilized as safely, efficiently, and effectively as possible.

(1) Company Resources:

- Company gas crews and Gas Operations contractors
- Customer service gas crews / Gas Distribution Services
- Gas contractors (Operator Qualified at various levels: GDS, Construction, Leak Survey, excavation only, etc.)
- Pressure Control crews
- Leak Survey crews
- Trained and qualified crews to remove water from gas facilities
- Use of retirees for various roles

(2) Mutual Assistance:

- GDS-type crews
- Gas construction-type crews
- Trained and qualified crews to remove water from gas facilities
- NYCHA Plumbers

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- Licensed plumbers
- · Building maintenance staffs
- Other external resources

For more information about the Mutual Assistance process, see Section 3.7.

b. <u>Develop Restoration Approach and Sequencing</u>

The means to restore gas may include the following:

- Break system up into smaller defined areas
- Restore supplies to transmission system
- Restore supplies to high pressure system
- · Restore supplies to medium pressure system
- Restore supplies to intermediate pressure system
- Restore supplies to low pressure system
- (1) Leak Survey Mains and Services:

Mains and services that have gas restored must be leak surveyed and documented as soon as possible per G-8149, "Responsibility for Maintenance/Replacement of Gas Services and Also the Testing Requirements for Temporarily Disconnected Gas Services." Additional surveys may also need to be scheduled.

c. Reintroduce Gas to Buildings

Restoration of gas to buildings must follow Gas Specifications <u>G-11836 Integrity Tests</u>, <u>Meter Turn-Ons</u>, <u>Meter Turn-Offs</u>, <u>Meter Exchanges</u>, and <u>Restoration of Gas Service</u> <u>After Repairs</u> and <u>G-11875 Procedure for Purging Gas Piping in a Building with Natural Gas After an Outage</u>, Repair, or a New Business Turn-On.

Procedures should include:

- Close appliance valve(s)
- Close riser valve(s)
- Close meter valve(s)
- Perform integrity test(s)
- Purge and gas-in piping and equipment

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4.0 TRAIN AND EXERCISE GAS EMERGENCY RESPONSE

A key to emergency response is a well-trained and well-prepared workforce through training and exercising. The Company's Exercise Development and Evaluation Guide provides common exercise policy and program guidance for Company exercises based on national standards and guidelines.

Gas Training programs are developed by evaluating applicable specifications and procedures for required tasks, including emergency response, as prescribed by Gas Engineering. Curriculum is developed based on specifications and procedures, and student knowledge and skills are assessed through written and/or practical examinations.

The program incorporates instructor-led-training, hands-on training, on-the-job training, and eLearning to provide a comprehensive learning experience. Gas Lessons Learned are discussed in a full-day seminar multiple times per year, and are also included in all other forms of training.

The facilities at The Learning Center ("TLC") are designed to provide "hands-on" practical applications of the skills learned by utilizing "Leak Street", indoor appliances, heating units, and other measures to simulate situations that may be encountered in the field under real operational conditions. Skills are then monitored in the field by supervisors.

4.1 Training

a. Gas Training

The Gas Training Staff at TLC supports Gas Operations by providing skills training and evaluations to employees and contractors who work on Con Edison's gas system. All training incorporates Con Edison's corporate values and the principles of "The Way We Work" into its curriculum. The Gas Training programs are developed by the Gas Operations Training Committees, in conjunction with the Gas Training Section at the Learning Center.

All training is aligned with Gas Specifications as prescribed by Gas Engineering, and incorporates instructor-led training, simulations and mock set-ups, eLearning, and Onthe-Job training. Students are evaluated through both knowledge and skill assessments, as required.

b. <u>Training for First Responders</u>

The Emergency Responder Training (GDS – Gas Distribution Services) is developed based on operator qualified tasks established by Con Edison's Operator Qualification Written Plan, and also incorporates incident command system training (i.e., ICS).

G-11845: Gas Emergency Liaison, Training and Response with External Public Safety Agencies describes the liaison, training, and response requirements for managing gas emergencies with external public agencies.

The training for emergency responders includes familiarization of inside and outside leak investigation and classification, responder equipment, hazardous materials training, and incorporates gas incidents lessons learned. Additionally, emergency responders receive training on how the Company integrates ICS into its response procedures to better equip them to support a gas emergency safely, and more efficiently.

First responders are augmented, as required, with other personnel from Gas Operations (e.g., Gas Construction, Leak Survey, qualified contractors, etc.). The comprehensive training curriculum is developed by the Gas Training Effectiveness

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Committee, whose purpose is to ensure that Gas employee training is effective and consistent with our specifications and procedures, and that Gas Operations' employees are prepared to perform their functions competently in the field. In addition, the Operator Qualified Committee consists of a cross-functional team whose role is to ensure compliance with our Operator Qualification Written Plan.

External Stakeholder³ Training Courses include:

- Properties of Natural Gas
- The Gas Transmission System and Facilities (Familiarization Drills)
- The Gas Distribution System
- Inside Gas Leaks
- Outside Gas Leaks
- Critical Locations (Familiarization Drills)
- Tactics (Code MuRRE, and Transmission Notification Protocol)
- Code 753 (Markouts)

4.2 Exercises

The Company will use the "Exercise Development and Evaluation Guide" (available on the Emergency Preparedness site) to assist in the design, delivery, and review of emergency response exercises. All exercise planning and implementation is coordinated by the Emergency Preparedness – Exercise, Training, and Liaison section.

Per CI 260-4, the Vice President of Gas Operations is responsible for ensuring that exercises are coordinated, evaluated, and documented for responses to Serious and Full-Scale incidents to identify and address areas for continuous improvement.

a. Frequency of Exercises4

Emergency Preparedness will initiate an <u>annual</u> exercise using a Serious or Full-Scale incident scenario. This will include equipment deployment at least every other year.

Gas Operations will conduct at least two response exercises per year unless an actual Serious or Full-Scale incident has taken place during the calendar year. The exercise will include the use of the ICS and must be based on a realistic scenario that tests the organization's capabilities to respond either to a system-related incident, or an environment-related incident, and should involve an Upgraded or Serious incident scenario. These exercises should ensure that support organizations are included to test their capabilities.

4.3 After-Action Review

After all exercise and real-world emergencies (Serious and Full-Scale level), Emergency Preparedness will conduct and facilitate an After-Action Review ("AAR"). This will include a detailed critique of the response, mitigation and restoration, and the adherence to ICS, as well as the plans, procedures, and policies of Gas Operations.

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The Exercise Development and Evaluation Guide provides direction on how to evaluate an exercise and develop an After-Action Report ("AAR"), and /or Improvement Plan ("IP"). The final document will identify corrective actions that should be taken to better prepare the organization for emergencies.

5.0 ADVICE AND COUNSEL

The Vice President of Gas Operations, or his / her designee, will provide advice and counsel on this procedure.

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6.0 ATTACHMENTS

6.1 Corporate Instructions and Policies

- a. CI 260-2: Incident Reporting
- b. <u>CI 260-4: Corporate Response to Incidents and Emergencies</u>
- c. Cl 260-5: Guide for Threat Response to Sabotage Attempts or Terrorist Attacks
- d. CI 490-2 Customer Care Emergency Response Plan
- e. <u>CI 810-2: Corporate Affairs' Crisis Communications Plan</u>
- f. CI 870-1: Records Management
- g. Corporate Coastal Storm Plan (CCSP)

6.2 ICS Resources

6.3 Gas Operations Specifications and Guidance

- a. Volume 1 Inspection and Maintenance
- b. Volume 2 Construction Standards
- c. Volume 12 Emergency Procedures Restricted
- d. Gas Operations Situation Room Activation Guide
- e Gas Operations Coastal Storm Plan

6.4 Mutual Assistance Exhibits

- Exhibit A Gas National Mutual Assistance Agreement Jan. 1, 2021 through Dec. 31, 2025
- b. Exhibit B Mutual Assistance Checklists
- c. Exhibit C Mutual Assistance Onboarding (Training for Responding Company)
- d. Exhibit D Mutual Assistance Participant Expectations
- e. New York Utilities Material Sharing Group (NYMSG) Protocol
- f. Staff Resources to Outage Response Matrix

6.5 Training and Exercises Resources

- a. G-11845: Gas Emergency Liaison, Training and Response with External Public Safety Agencies
- b. <u>Exercise Development and Evaluation Guide</u>

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Gas ERP Revisions Log

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09/01/22	Reformatted 3 rd level and below numbering on Sections 1 through 4, and 2 nd level numbering in Section 6	Sections 1, 2, 3, 4, and 6
09/01/22	Added "Make notifications to agencies when applicable per G-11850 (i.e., PSC, DOT/RNC, DEP)"	Section 2.1; Table 1; GERC
09/01/22	Added "Immediate and direct notification to the appropriate public safety answering point (i.e., FD, PD, and other public officials)"	Section 2.1; Table 1; GERC
09/01/22	Re-worded "Utilize ERGs to act as a liaison with First Responders and establish the Incident Command Structure" to "GERC's Emergency Response Group (ERG) will establish and maintain liaison with the appropriate responding public safety agencies (i.e., FD, PD, and other public officials)"	Section 2.1; Table 1; GERC
09/01/22	Added "Gas ERGs will establish the Incident Command Structure"	Section 2.1; Table 1; GERC
10/11/22	Added "Receive notifications of potential rupture and dispatch emergency response personnel to evaluate whether the notification is an actual rupture or non-rupture event"	Section 2.1; Table 1; GERC
09/02/22	Inserted "Technical Support" Department roles and responsibility to existing table	Section 2.1; Table 1
09/02/22	Changed "Gas Operations has four major operating departments" to "Gas Operations has five major operating departments"	Section 2.1
09/02/22	Added "Technical Support" as the additional Gas Operations Department mentioned in Section 2.1.	Section 2.1
10/11/22	Gas Control: Added "Identifies system conditions which are considered notifications of potential rupture, and relay such information to the GERC"	Section 2.2; Table 2
09/02/22	Removed "Technology Support" from Gas Engineering Department section	Section 2.2

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9/2/2022	Added "Project Management and Customer Programs Roles and Responsibilities" as "Table 4 Group Primary Responsibilities Emergency Functions Project Management & Customer Programs Financial, Engineering and Operational oversight for major programs including Main Replacement, Transmission, LNG modernization, and Third-party inspections for plastic fusion Management of customer-facing programs including Customer Connections, Service Line Inspections, Natural Gas Detector Installations, and the Interruptible Customer Program Activities include preparation of budgets, coordination with TIMP and DIMP, preparation of work schedules, coordination with external stakeholders, customer interaction/education/response/issue resolution, and inspections of company and customer equipment Emergency Functions Various (includes CERC positions, logistics support, municipal liaison assignments, wire guards, customer response/communication, business	Section 2.2 (c); Table 4
09/01/22	continuity and support during the loss of GOSS) Added CI 260-4 Corporate Response to Incidents and Emergencies hyperlink	Section 3.0
10/11/22	Emergency Response Objectives: Added "Contact Gas Control when emergency conditions exist AND associated field changes are made, which effect control room operations"	Section 3.0
10/11/22	Reworded "Upon notification of an incident, the GERC will send trained gas responders to the reported emergency location to determine the extent of damage or impact, if any, to the gas system. This may include but isn't limited to:" to "Upon notification of a potential incident, the GERC will send trained gas responders to the reported emergency location to determine the extent of damage or impact, if any, to the gas system. This may include, but isn't limited to:"	Section 3.1

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10/11/22	Investigate Impacts to Gas System: Added "Notifications of potential rupture"	Section 3.1
10/11/22	Added "Potential Ruptures Upon dispatch to a potential rupture location, the emergency responder should determine, as soon as practical, whether the potential rupture is an actual rupture event or a non-rupture event and report this information back to the GERC. Actual ruptures are unintentional or uncontrolled releases of a large volume of gas from a pipeline (typically from, but not limited to, a transmission pipeline). Indications of a rupture include signs of an exposition directly from the pipeline, or a pipeline break caused by the pipeline walls' inability to contain the pressure held within. If a rupture is determined, the emergency responder should immediately inform the GERC, who would then make proper notifications to Gas Control and other pertinent organizations."	Section 3.3 (C)
10/11/22	Added Footnote "1 Regardless of the number of outages, a pipeline rupture should be treated as a Full-Scale Incident Level.	Section 3.3 (C)
10/11/22	Reworded "The GERC coordinates emergency response efforts associated with incidents on the gas transmission and/or distribution system and implements ICS. The GERC is responsible for notifying appropriate federal, state, or local agencies regarding gas distribution system status." To "The GERC coordinates emergency response efforts associated with incidents on the Company's gas transmission and/or distribution systems and implements ICS. The GERC is responsible for notifying appropriate federal, state, or local agencies regarding gas distribution system status.	Section 3.6
09/01/22	In bullet "Emergency Preparedness – Emergency Support Group (or Logistics Operations Control Center ("LOCC") when mobilized) will coordinate and manage logistical needs (e.g., lodging, meals, and site-specific logistical needs)" changed "Emergency Preparedness" to "Facilities and Field Services"	Section 3.7(a)

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09/01/22	In bullet "Emergency Preparedness will coordinate and manage the logistical needs of the travelling personnel while in route (e.g., lodging, meals, and site-specific logistical needs)" changed "Emergency Preparedness" to "Facilities and Field Services - Emergency Support Group"	Section 3.7(a)
11/01/22	Deleted references to individual mutual assistance agreements with Northeast Gas Association (NGA), Southern Gas Association (SGA), and American Gas Association (AGA) and replaced with the Gas National Mutual Assistance Agreement that superseded and replaces those individual agreements	Section 3.7(a)
09/01/22	Updated procedure name from "CI 260-5 Guide for Emergency Response to Sabotage Attempts or Terrorist Attacks on Con Edison Electric, Gas, or Steam Systems or Other Corporate Facilities" to "CI 260-5: Guide for Threat Response to Sabotage Attempts or Terrorist Attacks"	Section 3.7(b)
09/01/22	Updated various links	Section 3.7(b)

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