



**Department
of Public Service**

**CASE 26-G-0169 – In the Matter of Staff’s Analysis of Local
Distribution Company (LDC) Performance
Related to the Pipeline Safety Measures.**

**2025 PIPELINE SAFETY
PERFORMANCE MEASURES REPORT**

**Office of Energy System Planning and Performance
Pipeline Safety Section
June 11, 2026**

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Executive Summary

Overall, 2025 performance showed continued positive progress across the four pipeline safety metrics for the 11 major gas Local Distribution Companies (LDCs).

LDCs' performance on the first measure, prevention of damage to buried gas facilities by excavation or demolition activities, improved in 2025. The data shows that the number of one-call tickets, i.e., excavators' requests that LDCs mark-out underground gas facilities prior to excavation, increased by 0.90%, rising from 762,432 to 769,421 (or 6,989 more tickets) from 2024. Concurrently, the total number of damages decreased by 71, from 1,236 to 1,165, as compared to 2024. This resulted in an improved performance for total damage, going from a rate of 1.62 per 1,000 one-call tickets in 2024 to a rate of 1.51 per 1,000 one-call tickets in 2025.

The damage prevention measure comprises 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. Three of the four categories showed improvements: third-party damages decreased from 0.84 damages per 1,000 one-call notifications in 2024 to 0.80 in 2025 (a 4.33% decrease); mismarks decreased from 0.39 damages per 1,000 one-call notifications in 2024 to 0.35 in 2025 (an 8.66% decrease); and no-call damages decreased from 0.31 in 2024 to 0.27 in 2025 (a 15.01% decrease). However, the LDCs' performance in the final category experienced decline. Damages by an LDC and/or its contractors increased from 0.09 damages per 1,000 one-call tickets in 2024 to 0.10 in 2025 (a 11.1% increase).

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 Public Service Commission (Commission) expects LDCs to respond to 75% of emergency reports within 30 minutes; 90% within 45 minutes; and 95% within 60 minutes. Emergency response performance showed modest improvement. Averaged across all LDCs, emergency response performance within each time window tracked —30 minutes, 45 minutes, and 60 minutes—improved slightly within a 0.263% range.

Despite these modest improvements, performance in each interval already far exceeds the established minimum percentages. The LDCs have continued to use technologies such as Global

Positioning System, 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.

The third measure, leak management, examines an LDCs' performance in discovering leaks, repairing leaks, and managing their unrepaired leak backlogs. All LDCs have demonstrated improvement in this measure over the past several years. The LDCs reduced the combined total year-end leak backlog by 539 leaks, from 3,764 in 2024 to 3,225 in 2025, a 14.32% reduction. The repairable year-end leak backlog improved by 25%, or 7 leaks, decreasing from 28 leaks in 2024 to 21 leaks in 2025. The total number of leaks discovered decreased by 2.09%, or 239 leaks, from 11,454 leaks in 2024 to 11,215 leaks in 2025. Additionally, the total number of leaks repaired decreased by 8.49%, or 1,272 leaks, from 14,988 in 2024 to 13,716 in 2025. The reduction in leaks discovered and repaired suggests that leak-prone pipe programs have helped reduce overall leak incidence on the LDCs' gas systems.

For the fourth measure, noncompliance with the Commission's pipeline safety regulations, Department of Public Service (DPS) staff conducts annual audits and investigations to evaluate LDCs on their compliance with those regulations. Each instance of noncompliance identified by staff represents an area where an LDC failed to meet these minimum requirements as prescribed. Reported instances of noncompliance vary greatly from year to year, due, in part, to staff's audit cycle. Staff identifies some 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 LDC responses to the audits, this measure reflects performance during calendar year 2024, as opposed to the other measures, which examine performance during calendar year 2025.

In 2024, staff identified a total of 1,050 instances of noncompliance, including instances associated with all 11 of the major LDCs. Instances of noncompliance occurred in 2.62% of the total number of records reviewed by staff and 0.05% of the total number of records available for review. Five of the LDCs had more instances of noncompliance than in 2023, one LDC had the same, and five LDCs had fewer. After staff identified and raised the compliance issues with the

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

LDCs, the LDCs either took corrective action or developed and implemented corrective plans such as revising inspection guidance materials to include all steps required by regulation.

Overall, the data indicates that LDCs' gas safety performance has substantially improved across the State over the 23-year period that staff has reported performance to the Commission. As LDCs continue outreach and education to excavators and the public, adopt better practices in responding to leaks, odors, and emergency reports, and work to remove leak-prone infrastructure, and as quality assurance and quality control programs continue to mature, staff expects further performance improvements will occur.

Introduction

The gas system poses risks to human health and safety, buildings and other property, and the environment. Gas safety incidents may be caused by corrosion, natural forces, excavation damage, or other outside force damage. Conditions of gas facilities under the oversight of the local gas distribution companies (LDCs), including leak-prone pipe—which generally includes unprotected steel, cast iron, wrought iron, and some earlier vintages of plastic pipe—equipment failure, incorrect operations, and other issues, may magnify the risks of the gas system. Local gas distribution companies (LDCs) can minimize these risks by taking steps to avoid construction damage to gas facilities; responding quickly to notifications of gas incidents; repairing leaks promptly; and complying with New York State Public Service Commission’s (Commission) gas safety regulations. Minimizing gas leaks also increases the efficiency of the gas system: in 2025, Department of Public Service (DPS) staff estimates that 217,272,851.91 cubic feet of combined gas escaped into the atmosphere—enough to provide heat to approximately 2,173 residential consumers for a year.²

While all gas corporations are subject to the Commission’s pipeline safety regulations, this report examines only the performance of the 11 largest LDCs, which provide gas service to over 99% of the customers in the State. These LDCs 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 (KEDLI); Liberty Utilities (St. Lawrence Gas) Corp. (Liberty); National Fuel Gas Distribution Corporation (NFG); Niagara Mohawk Power Corporation d/b/a National Grid (NMPC); 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 (KEDNY).

This report tracks the gas safety efforts of these 11 LDCs across the safety measures of damage prevention, emergency response, and leak management for calendar year 2025. It also presents the results of DPS staff’s audits and investigations that verify compliance with the minimum pipeline safety regulations for calendar year 2024. These performance measures help staff gauge whether New York LDCs are operating and maintaining the gas system safely and

² This is a conservative estimate based on damage prevention issues reported to staff.

adequately. Annual reporting of these measures shows both the safety performance of a given calendar year and the performance trends over time.

The Pipeline Safety Section of the Office of Energy System Planning and Performance has been producing this report since 2004. The four performance measures resulted from a collaboration, beginning in the 1990s, between the 11 major LDCs and DPS. Most of the data used in the report was gathered and submitted by the LDCs using processes developed from these collaborative efforts. 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 performance, 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 in discovering and repairing leaks in that year; and compliance with the Commission's minimum pipeline safety regulations.

LDCs report pipeline safety data according to the audit implementation plans approved by the Commission in 2017.³ These audit implementation plans resulted from the Commission's retention of an independent consultant to perform an operational audit of the performance measure data submitted by 9 of the 11 LDCs discussed in this report.⁴ The audit assessed the completeness and accuracy of the performance measure data submitted by LDCs. It also assessed whether the data is comparable across LDCs.

On April 20, 2016, the Commission issued an Order releasing the audit report and providing guidance on LDCs' responses to the recommendations.⁵ 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

³ Case 13-M-0314, Central Hudson Gas & Electric Corporation, et al. – Operational Audit, Order Approving Implementation Plans (issued March 10, 2017).

⁴ Case 13-M-0314, supra, Letters to LDCs (issued August 15, 2013).

⁵ Case 13-M-0314, supra, Order Releasing Report and Providing Guidance on Response (issued April 20, 2016).

focused on the LDCs' lack of written policies and procedures to address and collect data, instances where the methodology used to calculate the data varied, and minor inconsistencies among LDCs in the compilation of their respective data. The LDCs submitted implementation plans to address each recommendation in the audit report by May 20, 2016.

On March 10, 2017, the Commission issued an Order approving the implementation plans submitted by the LDCs and directing the LDCs to implement those plans.⁶ As a result of the LDCs' implementation of those plans since 2017, the data contained in the annual reports should be more consistent across each LDC than in prior reports.

Most recently, staff provided updated reporting forms to the LDCs for the 2026 calendar year on December 12, 2025. The updated damage prevention form includes: an annual reporting period, as opposed to quarterly; a new category for one-call ticket delays; and performance calculations based on total and rate case performance. The updated emergency response time form includes: an annual reporting period, as opposed to quarterly; performance calculations for monthly, quarterly, and annually; and a definition of emergency response times as commencing at the time a report is received and ending at the time a qualified company employee arrives at the location. The leak management form remained the same. Several of the LDCs expressed concern over the measurement of response times. Those LDCs committed to evaluating their tracking systems and will report when the measurement of response times is consistent with the guidance.

Performance and Analysis

Throughout this report, except for in the section on noncompliance, the figures display LDCs' performance in calendar years 2021 through 2025.⁷ For the noncompliance measure, the figures display the LDCs' performance in calendar years 2020 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 performance in the most recent year. The blue lines on the graphs represent average performance levels across the LDCs

⁶ Case 13-M-0314, supra, Order Approving Implementation Plans (issued March 10, 2017).

⁷ Appendix A of this report provides the historical calendar year data and associated case numbers.

Damage Prevention

Damage to underground gas facilities due to excavation activity remains one of the leading causes of gas pipeline failures and accidents, both statewide and nationally.⁸ Yet excavation-related damage is common: according to the Common Ground Alliance's most recent Damage Information Reporting Tool Report, damage to gas facilities accounted for 39% of reported damages to buried utilities in 2024.⁹

The general damage prevention process is as follows: (1) an excavator provides notice to a one-call notification system at least two full working days, not counting New York State publicly observed holidays and weekends, before beginning any excavation;¹⁰ (2) the one-call notification system transmits an excavation notice (one-call ticket or ticket)¹¹ to the member operators whose facilities may be affected by that excavation activity; (3) the affected operators clearly and accurately mark the location of buried facilities in or within 15 feet of the excavation area; (4) an excavator confirms that each operator has either marked its facilities or cleared the ticket, indicating that no utilities are located within the work site; (5) an excavator preserves the utility markings, with paint, flags, or both, until no longer required for safe excavation; and (6) an excavator works carefully around the marked facilities to avoid damages.

Staff assess the performance of each LDC by comparing the number of damages to the overall amount of construction and excavation activity in the LDC's service territory.¹² Staff further assess performance by examining the number of damages across four categories based on

⁸ Department of Transportation, Pipeline and Hazardous Materials Safety Admin., Advisory Bulletin, Preventing Excavation Damage During National Safe Digging Month and Beyond, 91 Fed. Reg. 21368, 21368 (Apr. 21, 2026) (PHMSA Advisory Bulletin) (noting national impacts of excavation-related pipeline incidents).

⁹ Common Ground Alliance, 2024 DIRT Report Datasheet (August 2025), <https://dirt.commongroundalliance.com/2024-DIRT-Report/2024-DIRT-Datasheets-Tools>.

¹⁰ New York State has two one-call notification systems: one for New York City and Long Island, New York 811, Inc., and one for the remainder of the State, UDig NY (formerly known as Dig Safely New York).

¹¹ The Pipeline and Hazardous Materials Safety Administration (PHMSA) reported a total of 35,813,977 one-call tickets across the United States in 2025. 769,421 one-call tickets, or 2.15% of that total, pertained to the facilities of the 11 New York LDCs. PHMSA Advisory Bulletin at 21368.

¹² Appendices B and C contain the data underlying the damage prevention analysis.

the point in the damage prevention process at which the error arose: (1) mismarks, (2) error of a third-party excavator, (3) error of LDC employees and their contractors, or (4) a no-call. For each category, staff report on the number of instances of that category of damage per 1,000 tickets received for each LDC.

Of all four categories, damages due to third-party excavator error is historically the largest category. The frequency of third-party excavator error suggests that third-party contractors need more education in safe excavation and best practices. Most large excavators are aware of the one-call systems and the requirement to notify the system before commencing excavation. However, many excavators, especially small excavators, are not well-versed in additional damage prevention 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 the nature of seasonal employees and their turnover year-to-year. The Commission cannot directly order such training for non-utility excavator personnel, but it may encourage excavator education by enforcing excavator compliance with the one-call requirements and imposing penalties for violations.¹³

Damage caused by LDCs' personnel or contractors is tracked as a separate category. LDCs' personnel and contractors benefit from robust damage prevention programs and operator qualification requirements to grant them the abilities and expertise to work carefully near the LDC's facilities. LDCs also have more direct oversight over contractors than over unaffiliated excavators. Given these factors, staff would expect this category to be a smaller contributor to overall damage performance and, in theory, the easiest for an LDC to improve. The current measure tracks underground damage caused by all utility operations within 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.

¹³ General Business Law (GBL) §765, Public Service Law (PSL) §119-b, and 16 NYCRR Part 753.

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 category assesses excavators' awareness of one-call notification systems. A high percentage of damage in this category suggests that LDCs should conduct more or more effective outreach to excavators about the one-call notification systems.

Combined LDC Performance

The LDCs reported a combined total of 1,165 underground damages in 2025, down from 1,236 in 2024. This contributed to an improved rate of damages per 1,000 one-call tickets: 1.51 in 2025, as compared to 1.62 in 2024. Because underground damage is largely a result of excavation and construction activity, reporting the damage measure as a rate per 1,000 one-call tickets helps normalize for variation in the volume of construction happening year-to-year or in different areas of the State. The number of one-call tickets represents an indirect measure of construction volume in a given service territory in that year. For the previous ten years, the LDCs reported an average of 1,408 damages, with a standard deviation of 145, showing consistency in this metric. Improvements to the rate of damage may partly be explained by increases in the number of one-call tickets as a result of improved utilization of the one-call notification system. New York's rate of damages per 1,000 one-call tickets is lower than the national average: in 2025, PHMSA reported a national average of 2.39 damages per 1,000 one-call tickets, 36.82% higher than New York's rate.¹⁴

Staff oversees and compels damage prevention efforts by enforcing the Commission's requirements contained in General Business Law (GBL) §765, Public Service Law (PSL) §119-b, and 16 New York Codes, Rules and Regulations (NYCRR) Part 753. Over the past five years, staff issued 1,535 citations, which led to training for 1,376 excavator employees with either New York 811, Inc. or UDig NY and the collection of \$2,770,611.68 in penalties. In 2025, staff issued enforcement citations in 305 cases of damage, or 26.18% of the 1,165 damages reported in 2025. Figure 1 displays the LDCs' overall performance regarding damage prevention measures.

¹⁴ Department of Transportation, Pipeline and Hazardous Materials Safety Admin., Advisory Bulletin, Preventing Excavation Damage During National Safe Digging Month and Beyond, 91 Fed. Reg. 21368, 21368 (Apr. 21, 2026).

Damage Prevention	2021	2022	2023	2024	2025
Number of Tickets	807,338	796,186	769,929	762,432	769,421
Mismarks	0.38	0.40	0.39	0.39	0.35
LDC and LDC Contractor Error	0.08	0.07	0.06	0.09	0.10
Excavator Error	0.79	0.89	0.92	0.84	0.80
No-Calls	0.37	0.35	0.35	0.31	0.27
Total Damages (per 1,000 Tickets)	1.63	1.71	1.72	1.62	1.51
Total Damages (per 10,000 Service Lines)	3.98	4.13	4.03	3.74	3.51

Figure 1 – Collective Damage Prevention Performance

As previously noted, 2025 saw a 0.92% increase in the number of one-call tickets. In 2025 the LDCs had 23 fewer mismatch damages (271, down from 294); 34 fewer no-call damages (205, down from 239); and 22 fewer third-party damages (615, down from 637).¹⁵ Additionally, these numbers were well below the five-year averages (2021 through 2025) of 298 for mismatch damages, 259 for no-call damages, and 661 for third-party damages. The number of damages resulting from LDCs' personnel and contractors increased to 74 in 2025, up from 66 in 2024.

Figure 2, below, displays a comparison between 2016 and 2025 of damage prevention performance across the LDCs, broken down by damage category:

¹⁵ The total damage performance may not equal the sum of the four categories due to rounding.

Metric	2016	2025
Number of Tickets	827,512	769,421
Mismarks	0.39	0.35
Co. & Co. Contractor Error	0.08	0.10
Excavator Error	0.98	0.80
No-Calls	0.44	0.27
Total Damages (per 1,000 Tickets)	1.89	1.51
Total Damages (per 10,000 Services Lines)	4.88	3.51

Figure 2 – Comparison between 2016 and 2025

Improvements across the categories of the damage prevention measures point to the success of the Commission's and LDCs' initiatives to raise awareness among excavators of the one-call system and damage prevention obligations as well as staff's work to enforce damage prevention laws and regulations. To aid in the enforcement of damage prevention regulations, LDCs voluntarily forward information they collect about incidents of excavators damaging underground facilities without having submitted a mark-out request (no-call). Recently, some LDCs have also voluntarily reported 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 have been removed or refreshed as part of 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. If the excavator agrees to complete a training session provided by the relevant one-call system, staff may resolve enforcement cases with a consent order agreement that reduces the financial penalty. 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.

Increased penalties also present a deterrence to noncompliance. Effective May 9, 2025, New York increased the statutory penalty for first violations of the requirements of 16 NYCRR Part 753, including the requirement for excavators to notify the one-call system, from \$2,500 to \$4,375 and for consecutive violations occurring within 12 months of the prior violation from \$10,000 to \$17,500.¹⁶

In addition to presenting the damage data as a rate per 1,000 tickets, which attempts to normalize for construction volume, this report presents the damage data as a rate per 10,000 gas service lines, which attempts to normalize across the LDCs' different system sizes. In 2025, the 11 major gas LDCs achieved a 3.51 damage rate per 10,000 gas services, marking a 6.38% improvement from the previous calendar year of 3.74. This rate was 18.75% below the 10-year average of 4.32 damages per 10,000 gas services. Over that same time, the total number of services — i.e., the number of service lines — increased from 3,203,732 in 2016 to 3,322,879 in 2025.

Appendices B and C provide the performance of each LDC in each of the damage prevention categories.

¹⁶ GBL §765. Article 36 requires utility operators, including LDCs, to participate in one-call notification systems. GBL §763. It also requires excavators to notify the one-call system and to take other damage prevention measures. GBL §764.

Individual LDC Performance

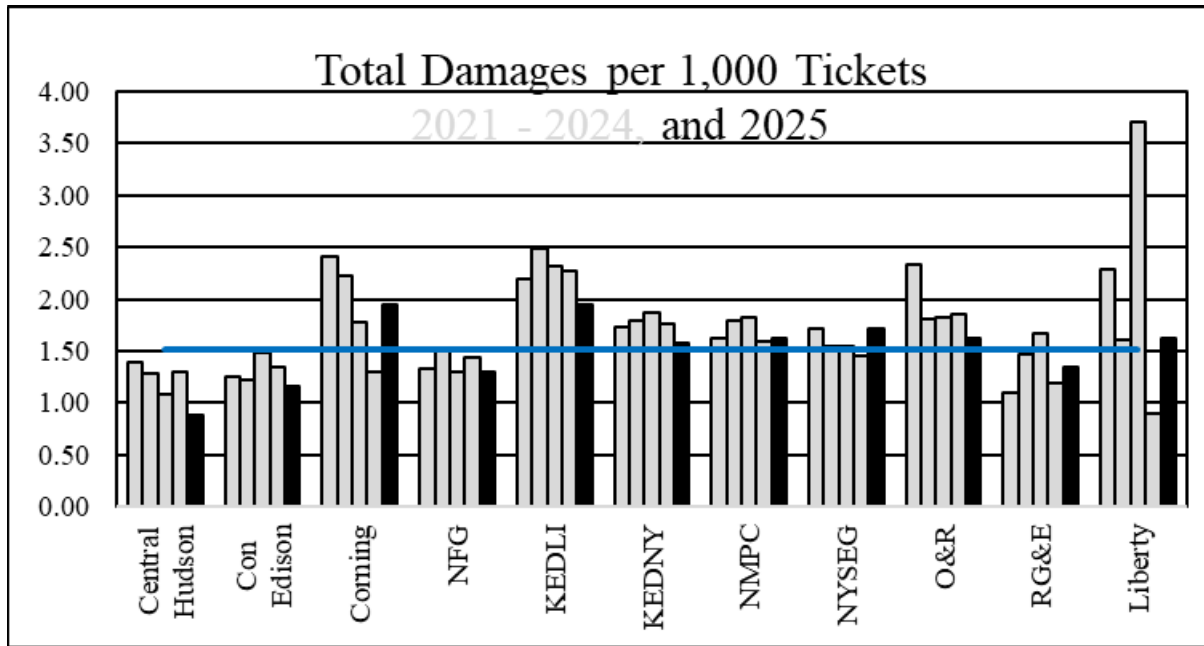


Figure 3 – Total Damages per 1,000 Tickets

Six LDCs improved on the total damages measure as compared to 2024: Central Hudson improved by 32.33%, decreasing from 38 total damages in 2024 to 25 in 2025 while receiving 819 fewer tickets; Con Edison improved by 13.8%, decreasing from 143 to 123 while receiving 234 fewer tickets; NFG improved by 10.17%, decreasing from 171 to 155 while receiving 1,067 more tickets; KEDLI improved by 14.47%, decreasing from 282 to 255 while receiving 7,077 more tickets; KEDNY improved by 10.15%, decreasing from 194 to 166 while receiving 5,243 fewer tickets; and O&R improved by 11.94%, decreasing from 73 to 68 while receiving 2,282 more tickets. Five LDCs performed worse than in 2024: Corning declined by 49.39%, increasing from 6 total damages in 2024 to 9 in 2025 while receiving 19 more tickets; NMPC declined by 2.45%, increasing from 164 to 166 while receiving 1,239 fewer tickets; NYSEG declined by 17.86%, increasing from 82 to 94 while receiving 1,541 fewer tickets; RG&E declined by 12.97%, increasing from 79 to 97 while receiving 5,768 more tickets; and Liberty declined by 81.03%, increasing from 4 to 7 while receiving 148 fewer tickets.

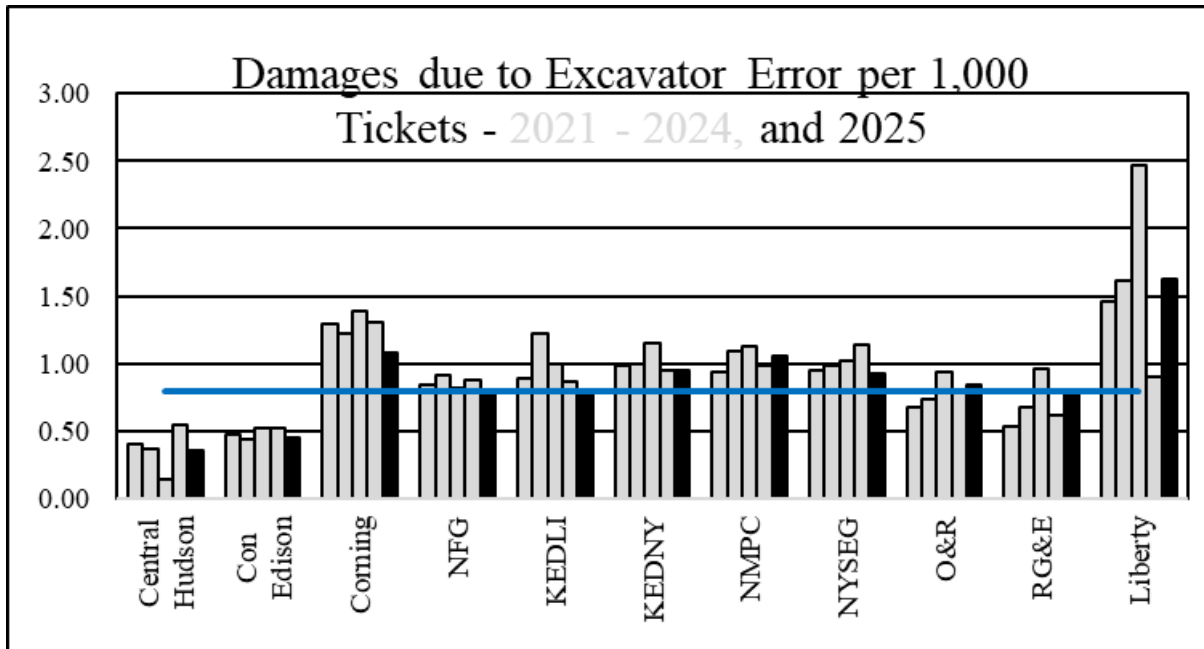


Figure 4 – Excavator Error Damages per 1,000 Tickets

As seen in Figure 4, seven LDCs improved in the excavator error damage category from 2024 to 2025: Central Hudson decreased excavator error damages from 16 to 10 (35.71% decrease); Con Edison decreased from 55 to 48 (12.53% decrease); Corning decreased from 6 to 5 (17.01% decrease); NFG decreased from 104 to 92 (12.33% decrease); KEDLI decreased from 108 to 104 (8.91% decrease); KEDNY decreased from 105 to 99 (1% decrease); and NYSEG decreased from 64 to 51 (18.07% decrease).

Four LDCs performed worse compared to 2024: NMPC experienced 102 excavator error damages in 2024 and 108 in 2025 (7.17% increase); O&R increased from 32 to 35 (3.4% increase); RG&E increased from 41 to 56 (25.67% increase); and Liberty increased from 4 to 7 (81.03% increase).

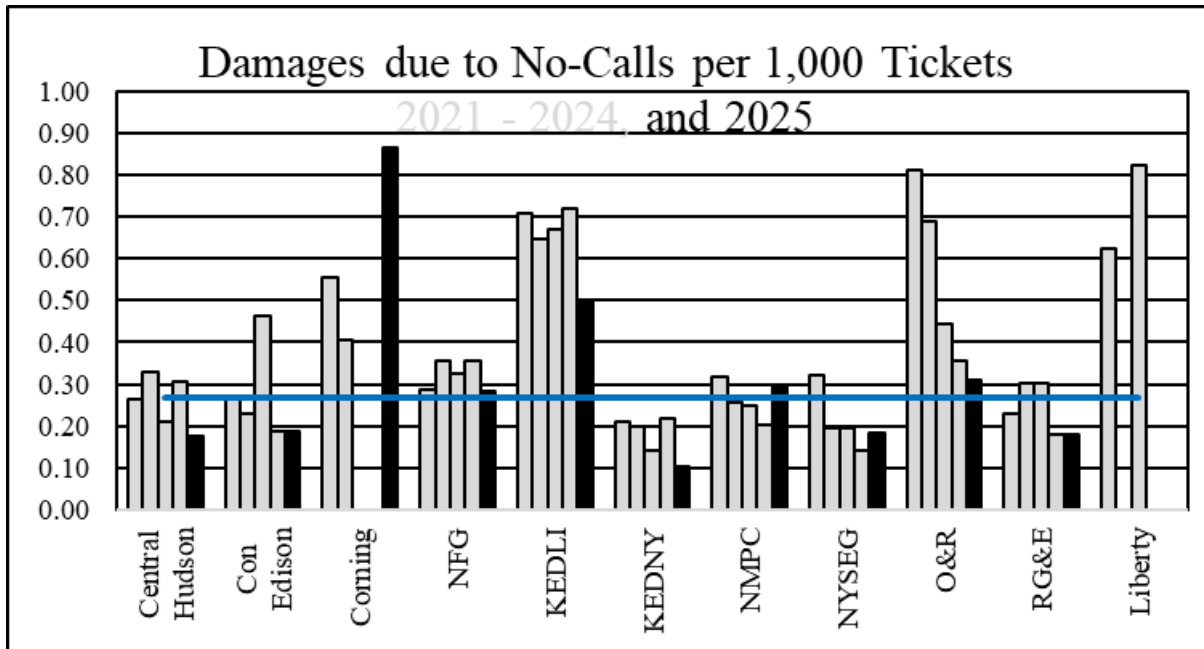


Figure 5 – No-call Damages per 1,000 Tickets

As Figure 5 shows, six LDCs improved on the no-call damages measure, four LDCs performed worse, and one LDC remained the same as the previous year. Central Hudson decreased from 9 no-call damages to 5 (42.85% decrease per 1,000 tickets); NFG decreased from 42 to 34 (19.77% decrease per 1,000 tickets); KEDLI decreased from 89 to 65 (30.91% decrease per 1,000 tickets); KEDNY decreased from 24 to 11 (51.87% decrease per 1,000 tickets); O&R decreased from 14 to 13 (12.22% decrease per 1,000 tickets); and RG&E increased from 12 to 13 (0.32% decrease per 1,000 tickets).

As mentioned above, five LDCs performed the same or worse than the previous year: Con Edison remained at 20 no-call damages (0.22% increase per 1,000 tickets); Corning increased from 0 no-call damages to 4; NMPC increased from 21 to 30 (44.59% increase per 1,000 tickets); and NYSEG increased from 8 to 10 (28.52% increase per 1,000 tickets). Liberty’s performance remained at 0 no-call damages for the second year in a row.

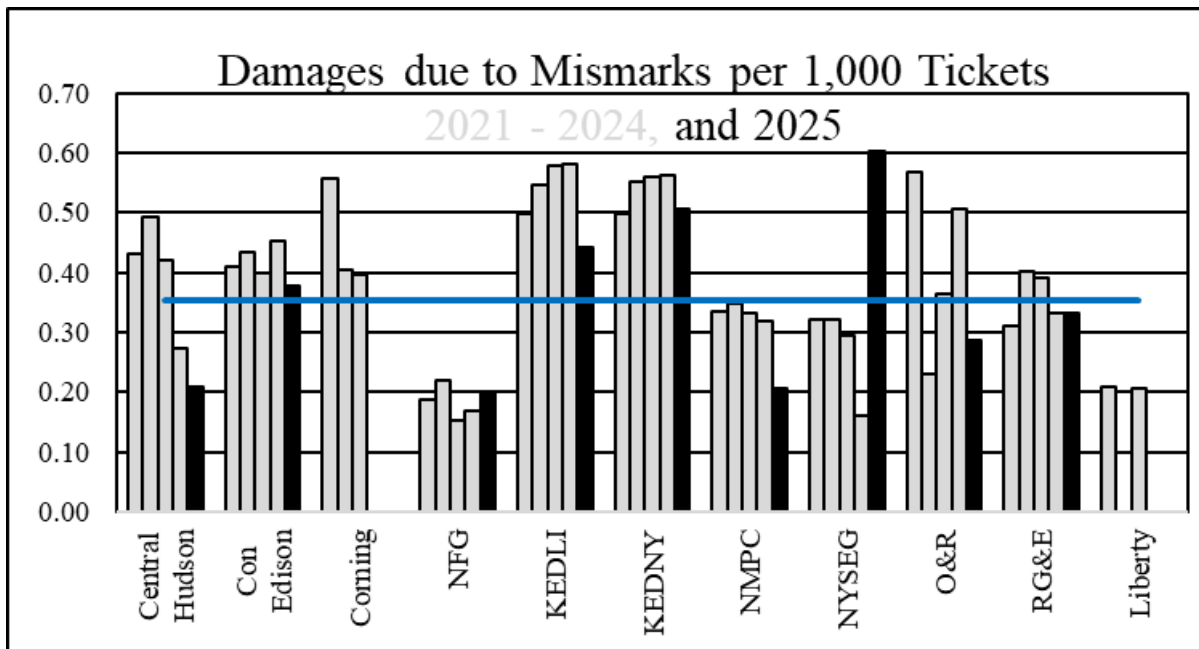


Figure 6 – Mismark Damages per 1,000 Tickets

As seen in Figure 6, six LDCs improved in the mismark damages measure in 2025, three LDCs performed worse, and two LDCs showed no change from 2024. For those improving from 2024 to 2025: Central Hudson decreased from 8 mismark damages to 6 (a 22.85% decrease per 1,000 tickets); Con Edison decreased from 48 to 40 (16.48% decrease per 1,000 tickets); KEDLI decreased from 72 to 58 (23.8% decrease per 1,000 tickets); KEDNY decreased from 62 to 53 (10.24% decrease per 1,000 tickets); NMPC decreased from 33 to 21 (35.59% decrease per 1,000 tickets); and O&R decreased from 20 to 12 (43.28% decrease per 1,000 tickets).

For those with worse performance in 2025: NFG increased from 20 mismark damages to 24 (18.93% increase per 1,000 tickets); NYSEG increased from 9 to 33 (276.98% increase per 1,000 tickets); and RG&E increased slightly from 22 to 24 (0.37% increase per 1,000 tickets). Coning’s and Liberty’s performance remained the same at zero mismark damages. Overall, the LDCs collectively showed an 8.66% improvement in performance, decreasing from 294 mismark damages in 2024 to 271 in 2025.

Staff typically expect to see the mismark damages measure improve year to year as LDCs continue to adopt best practices for locating their facilities. Best practices include replacement, removal or rehabilitation 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 that LDCs hire to mark out their facilities. When damage occurs, LDCs update their pipeline maps and records to reflect the exact location of the buried facilities.

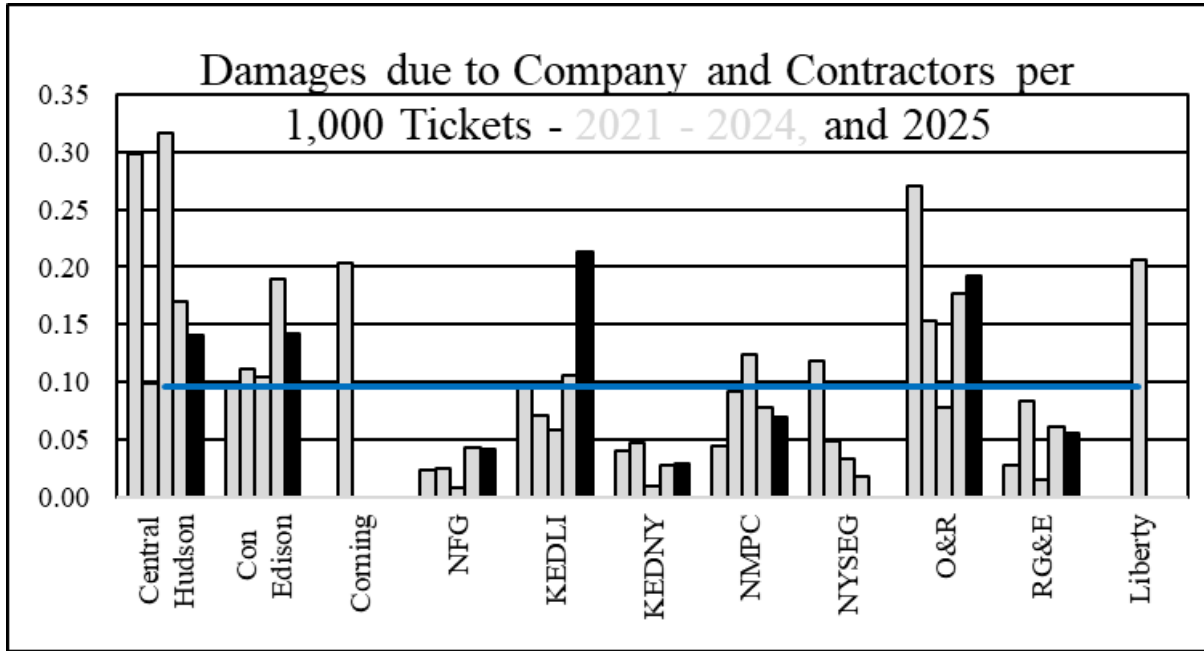


Figure 7 – Damages due to Company and Company Contractors per 1,000 Tickets

Damages due to an LDC or its contractors is the one category of the damage prevention measure that did not improve in 2025. As Figure 7 shows, six LDCs improved in this category, three LDCs performed worse, and two LDCs remained the same in 2024. Overall, damages due to an LDC or its contractors increased by 11.10%, going from 66 such damages in 2024 to 74 in 2025.

The LDCs are expected to maintain a high degree of control over their contractors, especially as compared to 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 and to safely respond when damage does occur. The lack of improvement in this category may reflect that, with the Commission’s support, the LDCs have continued to proactively remove leak-prone pipe. Leak-prone pipe removal leads to more excavation from the LDCs and their contractors near and around gas facilities, especially older gas facilities, which increases the opportunities for damage.

This category of damage has the lowest total number of damages and is thus 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 prior 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. Nevertheless, LDCs should not underestimate this category of damage. All damage poses safety concerns and has 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.

Emergency Response

The emergency response measure evaluates the speed of LDCs' responses to gas leak, odor, and emergency notifications generated by the public or other authorities such as police and fire departments or municipalities. Per 16 NYCRR §255.825, LDCs must provide the Commission with data on each leak, odor, and emergency report received during the prior calendar month, including data on the LDC's response time, in intervals of 15 minutes, to the report. LDCs measure response times from the minute a report is received (when the call starts) to the minute a qualified company employee arrives at the location.¹⁷ The LDCs' rate cases establish that LDCs should respond to 75% of leak, odor, and emergency reports within 30 minutes; 90% within 45 minutes; and 95% within 60 minutes. Typically, LDCs have few instances of response times exceeding 60 minutes.¹⁸

Figure 8 displays the aggregated LDCs' annual emergency response time performance for each standard since 2021, with the 2025 performance presented in black.

¹⁷ 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.

¹⁸ The Commission expects LDCs to review the circumstances of each instance of a response time exceeding 60 minutes and work towards their elimination.

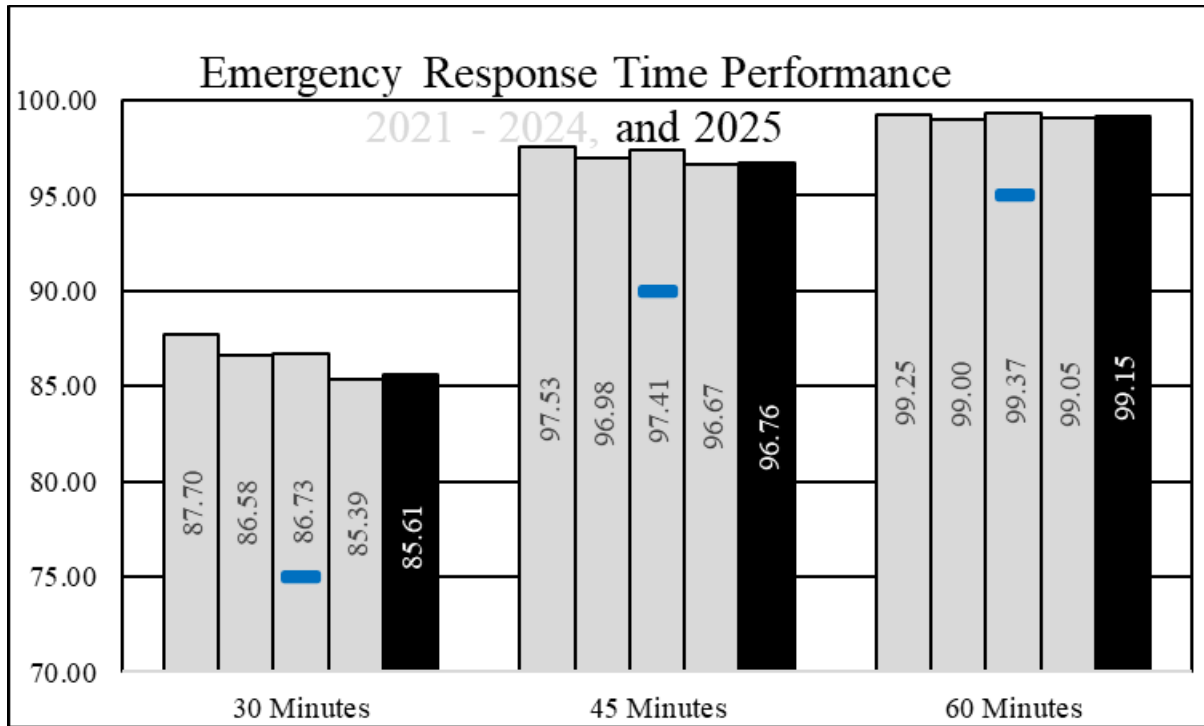


Figure 8 – Emergency Response Time Performance

In 2025, the total number of leak, odor, and emergency reports were 4.49% higher than in 2024, increasing from 146,115 to 152,671. The LDCs’ performance improved slightly in each of the response time intervals as compared to 2024. The data over the five-year period, 2021 through 2025, shows that the LDC operators continue to maintain their performance for this category. Although the total number of reports went up this year, it is still below the ten year average of 163,837 leak, odor, and emergency notifications, perhaps reflecting the proactive leak-prone pipe removal programs approved by the Commission in rate proceedings.

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

LDCs	2021	2022	2023	2024	2025
Central Hudson	84.3	85.6	87.9	86.2	87.2
Con Edison	95.9	97.2	97.3	98.2	99.5
Corning	86.5	82.8	84.0	84.0	76.8
NFG	95.8	93.1	96.7	97.0	97.0
KEDLI	82.1	78.5	77.4	76.6	78.3
KEDNY	78.7	78.2	78.1	79.7	78.0
NMPC	83.9	81.1	79.0	78.8	77.3
NYSEG	83.6	82.0	82.4	75.8	78.3
O&R	91.8	87.8	88.4	88.2	85.1
RG&E	87.9	86.9	85.9	72.1	77.4
Liberty	77.7	76.3	79.6	82.4	82.3

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

In 2025, all 11 LDCs exceeded the standard of responding to 75% of leak, odor, and emergency reports within 30 minutes in 2025, 90% within 45 minutes, and 95% within 60 minutes. Appendices D and E provide LDC-specific data for 45- and 60-minute response times. Staff expect that all LDCs will continue to evaluate and monitor their performance in this measure and to identify areas where they can implement best practices to further exceed the benchmarks.

Leak Management

The leak management performance measure serves to gauge how the LDCs are discovering and repairing leaks on their systems, eliminating potentially hazardous leaks, and reducing total leak backlogs, in total and by system mileage. This measure does not substitute for, and is not a reflection upon, any LDC’s compliance with pipeline safety regulations. The data reported by the LDCs include: 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. Appendices F through L provide the complete leak management data reported by the LDCs.

The gas pipeline safety regulations classify leaks according to their relative hazard, taking into account factors such as level of gas detected, proximity to buildings, or presence of frost or pavement, among other factors.¹⁹ Type 1 leaks are considered “potentially hazardous” and require “an immediate effort to protect life and property.”²⁰ Types 2A and 2 are less risky but still potentially hazardous and require repair within six months or one year, respectively.²¹ All other leaks fall into Type 3 and must be reevaluated during the next required leakage survey or annually, whichever is less frequent.²²

Minimizing leak backlogs by December, the end of the calendar year, is especially important because unrepaired potentially hazardous leaks pose an increased safety risk during frost season. Frost acts as a blanket preventing gas from venting through the soil, forcing gas to pool under the surface or within structures, thus increasing the chance that gas will migrate into buildings. The data reported here reflects the lowest number of leaks in each LDC’s backlog during the last two weeks in December.

The overall year-end backlog of potentially hazardous leaks decreased from 28 in 2024 to 21 in 2025, representing a 25% improvement. The backlog is down 98.22% from 2003, when it was 1,178. This improvement demonstrates the LDCs’ efforts to complete leak surveys earlier in the year, to allow for time to repair discovered leaks.

Figure 10 displays the backlog of potentially hazardous leaks from 2021 through 2025.²³ Appendix H contains the data for this measure.

¹⁹ 16 NYCRR §255.8.

²⁰ 16 NYCRR §255.811.

²¹ 16 NYCRR §255.813, and 255.815.

²² 16 NYCRR §255.817.

²³ 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.

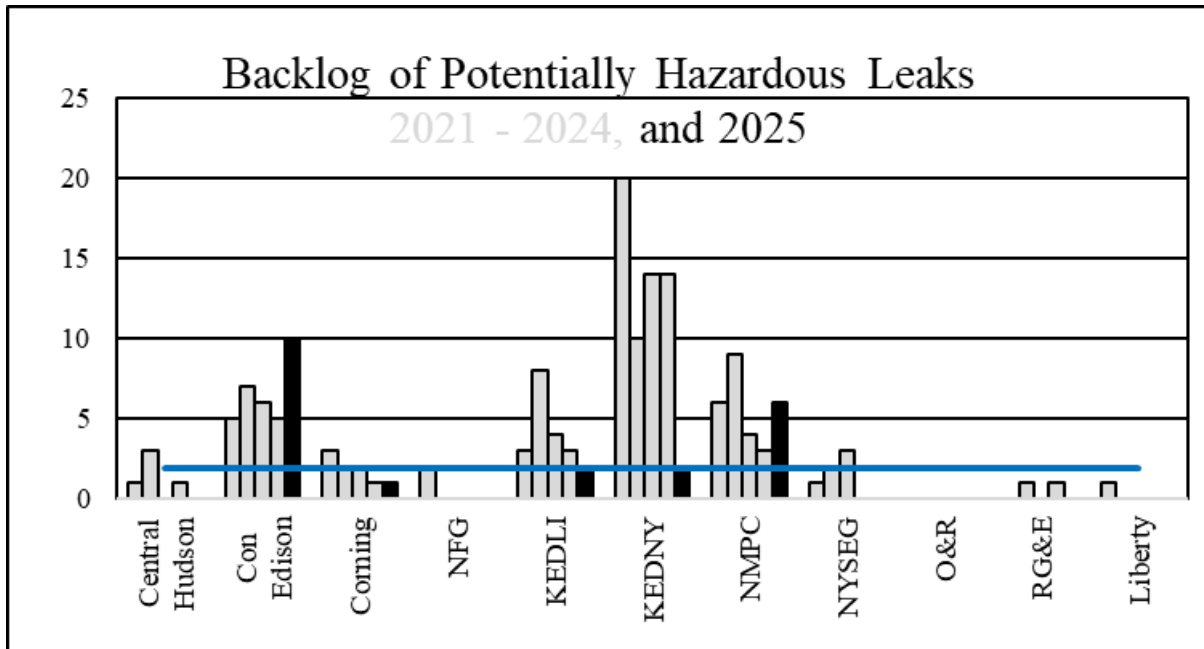


Figure 10 – Backlog of Potentially Hazardous Leaks

Total leak backlogs include all potentially hazardous leaks (Types 1, 2, and 2A), as well as Type 3 leaks, which do not have a mandatory repair timeframe per the pipeline safety regulations. Without a mandatory repair timeframe for Type 3 leaks, LDCs could allow their total leak backlog to grow while still meeting the minimum pipeline safety regulations. However, in recent years, the Commission has incorporated negative revenue adjustments into the LDCs rate plans that incentivize the LDCs to reduce their total leak backlogs in addition to their potentially hazardous leak backlogs. Reducing Type 3 leaks also results in a reduction of methane emissions.

Figure 11 displays the backlog of total leaks (including both the potentially hazardous types, Type 1, 2A, and 2, and all other leaks, Type 3) from 2021 through 2025. Appendix K contains the numerical leak data.

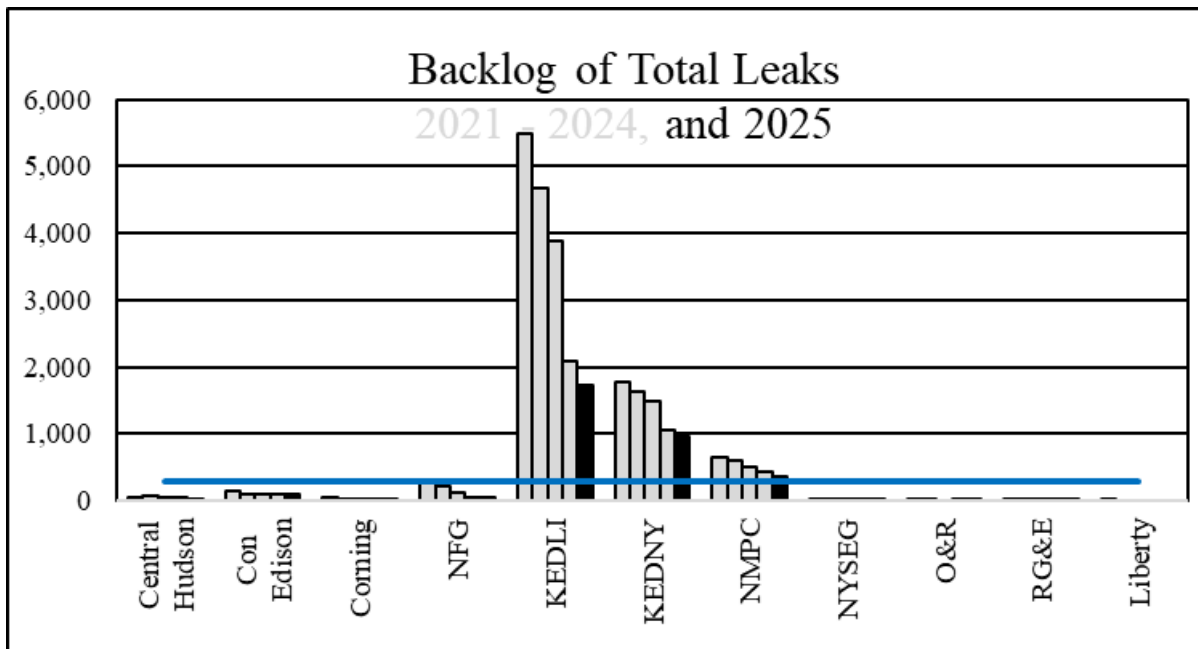


Figure 11 – Backlog of Total Leaks

As seen in Figure 11, the majority of LDCs either improved upon their total leak in 2025 or maintained negligible total leak backlogs. KEDLI and KEDNY continue to be outliers in this measure; however, they have improved significantly since 2021. KEDLI and KEDNY reduced their backlogs by 17.42% and 9.32%, respectively, as compared to 2024. This resulted in a combined total of 539 fewer leaks in 2025. Their total leak backlogs, however, are still considerably higher than the next highest LDC, NMPC, and account for 82.79% of the overall total leak backlog amongst the LDCs. Taken together, the National Grid companies, KEDLI, KEDNY, and NMPC, account for 94.02% of the entire LDCs’ total leak backlog. In fact, the National Grid companies’ performance skews the statewide average of total leak backlog, obscuring comparisons among the other LDCs and overshadowing the other LDCs’ progress in reducing and maintaining their backlogs. Staff expects that the National Grid companies will continue to aggressively reduce their leak backlogs.

Most LDCs improved on this measure in 2025: Central Hudson decreased total leaks from 37 to 26 (29.73% decrease); Con Edison decreased from 93 to 89 (4.3% decrease); KEDLI decreased from 2,078 to 1,716 (17.42% decrease); KEDNY went from 1,052 to 954 (9.32% decrease); NMPC went from 434 to 362 (16.59% decrease); NYSEG went from 3 to 1 (66.67% decrease); O&R decreased from 3 to 2 (33.33% decrease); and RG&E decreased from 6 to 3

(50% decrease). NFG’s leak backlog increased: it had 60 total leaks in 2025, up from 46 (30.43% increase). Both Corning and Liberty remained unchanged at 12 and 0 total leaks, respectively. As the LDCs continue replacing, removing, and rehabilitating leak-prone pipe over the next several years, staff expect that the backlog of total leaks will continue to improve.

Figure 12 shows the number of leaks discovered by type. Figure 13 shows the mileage of pipe associated with leaks by leak type. Figures 14 and 15 show the number of leaks and mileage of pipe repaired by leak type.

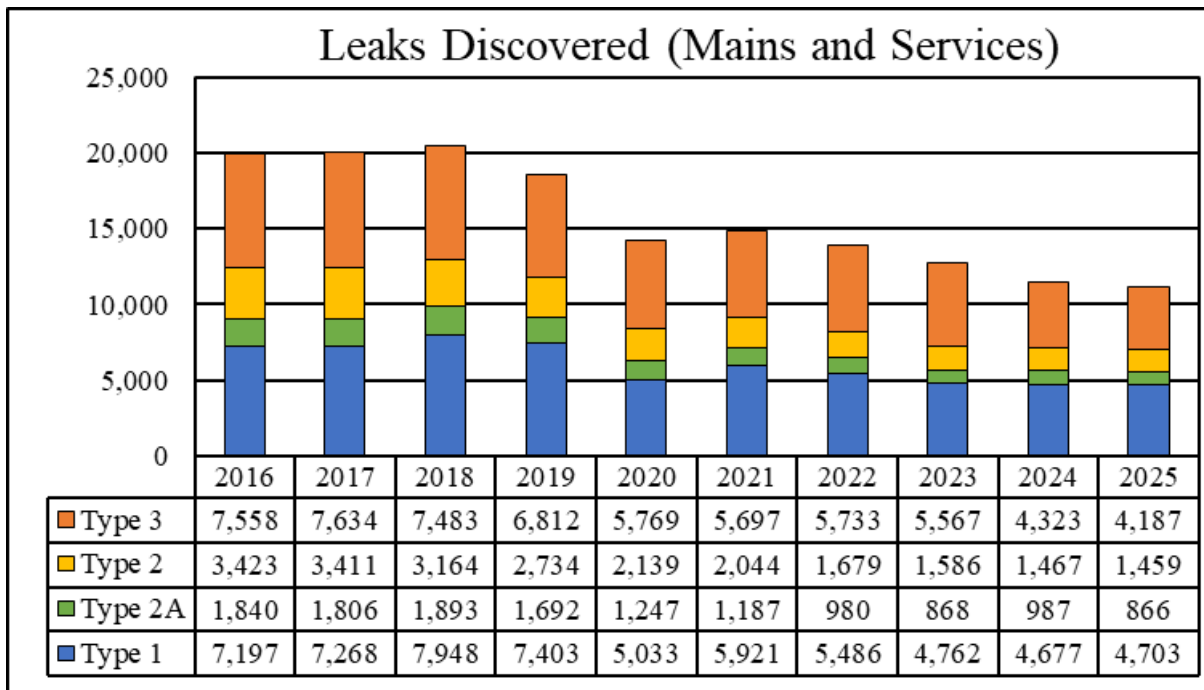


Figure 12 – Leaks Discovered by Type

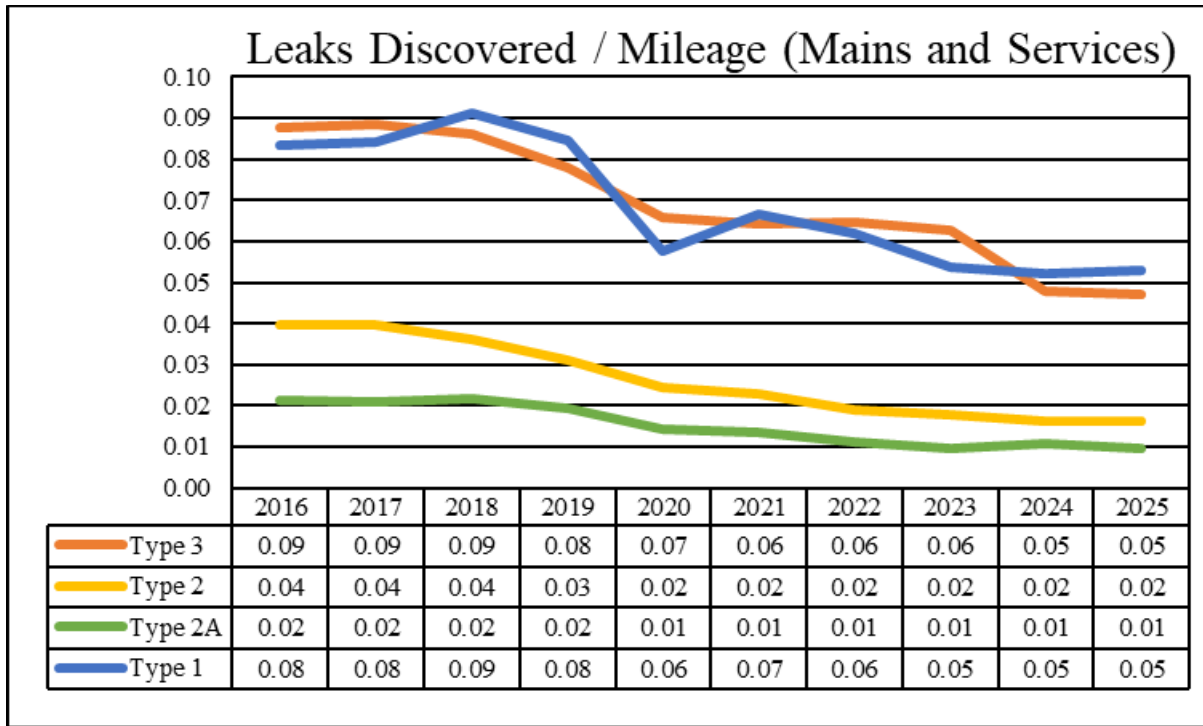


Figure 13 – Leaks Discovered by Type / Mileage

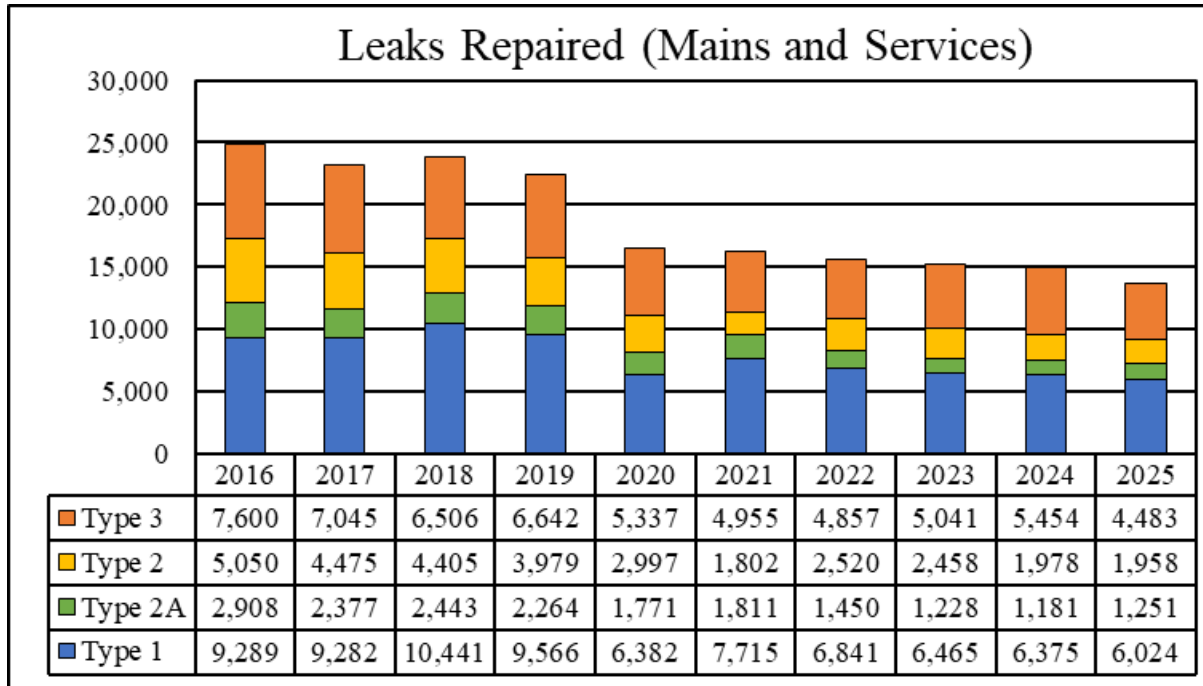


Figure 14 – Leaks Repaired by Type

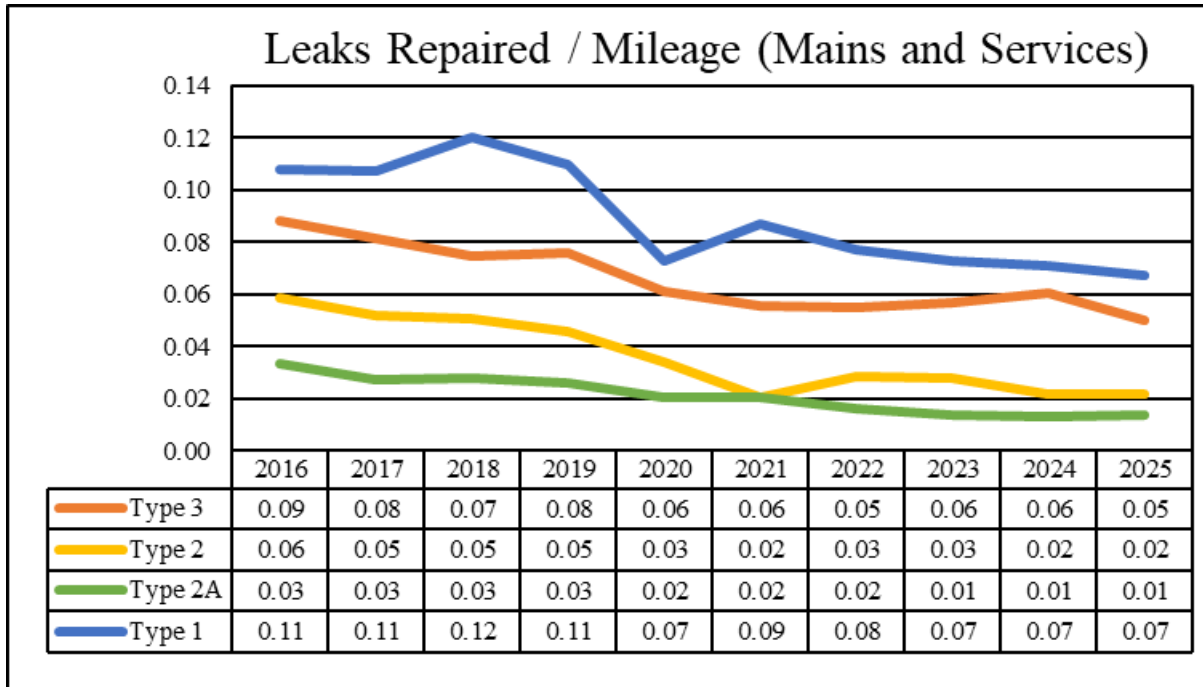


Figure 15 – Leaks Repaired by Type / Mileage

As seen in Figures 12 through 15, 2025 did not see consistent trends in the number of leaks discovered and repaired across leak type. For instance, the LDCs discovered fewer Type 2A, Type 2, and Type 3 leaks in 2025 than in 2024 but more Type 1 leaks. Also, the number of repairs for 2A leaks increased in 2025, whereas the number of repairs for Type 1, Type 2, and Type 3 leaks decreased.

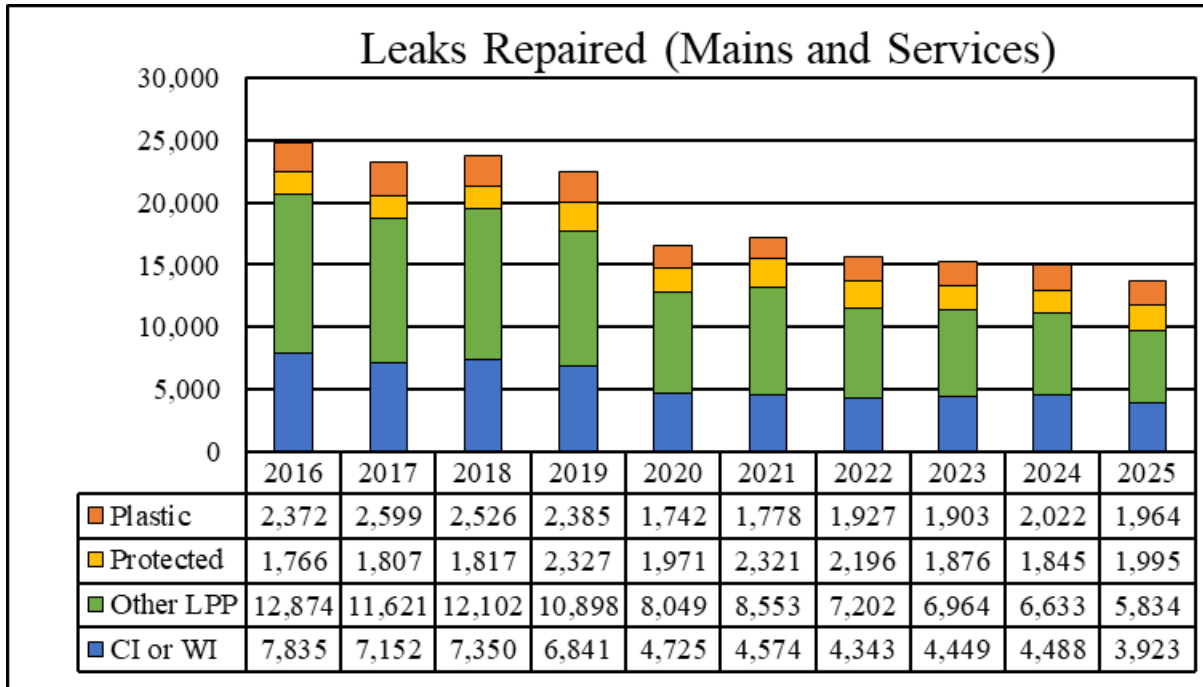


Figure 16 – Leaks Repaired by Material

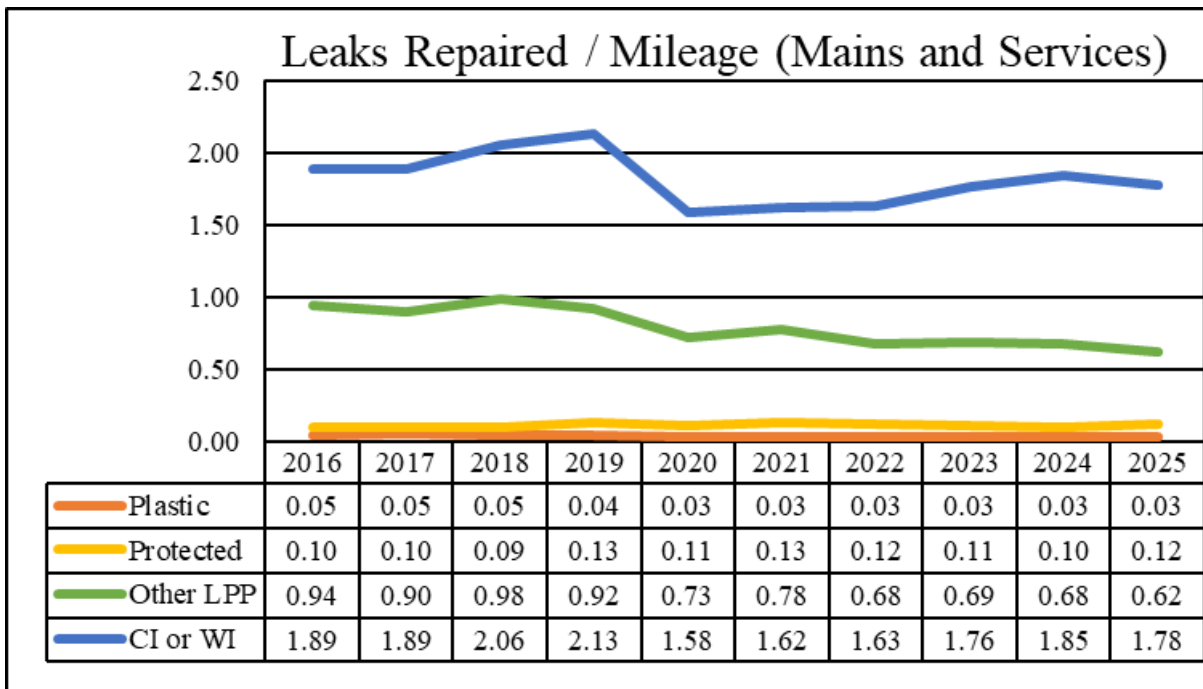


Figure 17 – Leaks Repaired by Material / Mileage

Figures 16 and 17 display the number of leaks and mileage of pipe repaired by pipe material. This data can provide an indication of which materials are most prone to leaks. Figure 16 shows the number of leaks repaired per material type (plastic, protected, other leak-prone pipe excluding cast and wrought iron,²⁴ and cast and wrought iron). Each year from 2016 through 2025, LDCs reported more leaks repaired on other leak-prone pipe (5,834) than on cast and wrought iron (3,923). However, after normalizing these figures by the system mileage of the respective materials, as seen in Figure 17, the rate for leaks repaired per mile of cast and wrought iron pipe (1.78) is nearly triple that of other leak-prone pipe (0.62). This data suggests that cast and wrought iron pipe have greater likelihood of leaks than other leak-prone pipes. Further, other leak-prone pipe is nearly five times more likely to leak than non-leak-prone pipe.

Staff encourage LDCs to continue to identify and remove or replace leak-prone pipe materials. Most of the LDCs have already incorporated performance programs to remove deteriorating and leak-prone infrastructure and reduce leak backlogs into their rate plans. The LDCs assign weighted factors to each material type in their leak-prone pipe programs to focus their replacement, removal, or rehabilitation efforts on the pipes that present the most risk. These leak-prone pipe replacement programs are some of the primary drivers in the reduction of hazardous leaks, total leaks, and the associated fugitive methane emissions associated with the leaks.

Compliance Measure

The final measure evaluates LDCs based on instances of noncompliance with pipeline safety regulations. Staff assesses LDCs' compliance through record and field audits and through investigations. For record audits, staff reviews the previous calendar year's documentation and then reports any instances of noncompliance to the LDC. Throughout the remainder of the year, staff conducts field audits of LDC crews to evaluate the crews' performance against the regulations and the LDCs' applicable procedures. As in record audits, any instances of noncompliance are documented and reported. Staff conduct these audits according to a five-year audit plan, which selects a certain subset of regulations to focus on each year, based primarily on

²⁴ "Other leak-prone pipe" includes bare or ineffectively coated steel, certain brittle plastic materials, and other materials that the LDCs consider leak-prone pipe but excludes cast or wrought iron pipe.

the risk associated with noncompliance with the regulation. Staff review regulations identified as high risk annually; regulations identified as “other risk” receive auditing every two, three, four, or five years. Staff’s audits focus on the LDCs’ compliance with the pipeline safety regulations but also review areas in which LDCs, based upon historic experiences and identified risks, have chosen to exceed minimum standards.

In addition to audits, this measure reflects the results of staff investigations reports and complaints of gas safety incidents and concerns. Staff evaluate the details of the incident, perform on-site investigations and interviews, identify the root cause or causes of the accident or incident, obtain any pertinent information or photographs, and document any instances of noncompliance.

This measure includes data from records generated, field activities performed, or accidents and incidents that occurred during a specific calendar year. This measure is a lagging indicator, reflecting the time required to conduct audits, report audit findings, and receive a response from LDCs to staff’s findings. Audits are not considered complete until all steps are finalized. Thus, 2024 findings are the most recent findings contained in this report. Staff’s audits of 2025 records are currently in progress for inclusion in next year’s Performance Measures Report.

Figure 18, below, displays the total number of instances of noncompliance for the five-year period from 2020 through 2024, normalized by the number of operator headquarters (OHQs) within an LDC. An OHQ is a centralized facility through which an LDC runs its operations and maintenance activities for a subdivision of the service territory. Each LDC has a different number of these facilities, each overseeing a specified area within the LDC. Appendices M and N contain the data per LDC and per the number of OHQs in each LDC.

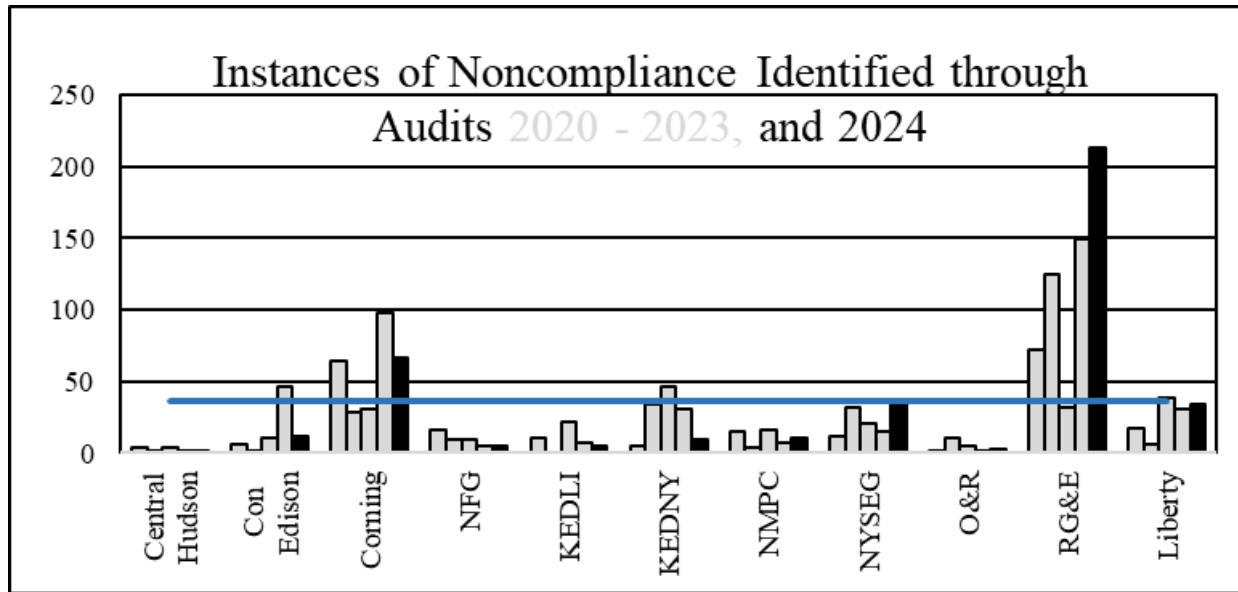


Figure 18 – Instances of Noncompliance Identified through Audits

As shown in Figure 18, the number of instances of noncompliance per OHQ for each LDC 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. Thus, the graph does not represent a direct comparison of year-to-year compliance but rather shows instances of noncompliance with the subset of pipeline safety regulations conducted during the year.

In 2024, staff identified a total of 1,050 instances of noncompliance for all 11 of the major LDCs. This represents 2.62% of the total number of records reviewed and 0.05% of the total number of records available for review. In other words, 97.38% of the total number of records reviewed were compliant with the Commission’s pipeline safety regulations.

In 2024, the number of instances of noncompliance, normalized by OHQ, increased for six of the LDCs, while the other five LDCs experienced decreases. The LDCs primarily attributed these increases to problems resulting from the transition from paper records to electronic records; inspections that the LDCs could not complete due to lack of access; and LDCs’ misunderstanding or misinterpretation of the Commission’s pipeline safety regulations regarding business district leakage surveys, service regulator inspections, maintenance of service line valves, or atmospheric corrosion control: monitoring. The LDCs also ascribed some instances of noncompliance to employees’ or contractors’ failure to correctly follow the LDCs’ operations and maintenance procedures. After bringing these issues to the LDCs’ attention, the

LDCs have developed and implemented plans to re-train their employees, revised electronic forms to capture required steps in inspections, and completed inspections that either had not been completed or had not been properly documented. As such, staff do not expect reoccurrence of these violations.

Conclusion

Evaluating and enforcing pipeline safety is critical to ensuring that gas is a safe, reliable component of the energy system. The pipeline safety performance measures described in this report provide the Commission and staff with the ability to evaluate trends in four key pipeline safety areas: damage prevention, emergency response times, 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 ten years, LDCs have worked to improve performance in these measures. Over this time, reported instances of damages decreased from 1.89 damages per 1,000 one-call tickets in 2016 to 1.51 in 2025 (a 20.11% decrease); response time to leak, odor, and emergency reports has improved, with 85.61% of responses occurring within 30 minutes (up from 82.82%), 96.76% within 45 minutes (up from 96.18%), and 99.15% within 60 minutes (up from 98.8%); and the year-end backlogs of potentially hazardous and total leaks have decreased by 63.79% and 81.29%, respectively, going from 58 potentially hazardous leaks in 2016 to 21 in 2025, and from 17,233 total leaks in 2016 to 3,225 in 2025.

As LDCs continue outreach and education efforts to excavators and the public; adopt best practices in responding to leak, odor, and emergency reports; work to replace, remove, and rehabilitate leak-prone pipe; and implement quality assurance and control programs, staff expects that the LDCs will realize further improvements. LDCs with clear opportunities for improvement when compared to their peers should reach out to learn from LDCs that have exhibited superior performance.

Staff commends the LDCs' efforts and will continue to meet with LDCs on a regular basis. Staff will continue to monitor LDCs' performance and analyze trends in future performance measure reports.

Appendix A

Historical Annual Pipeline Safety Performance Report Case Numbers²⁵

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
2025	26-G-0169

²⁵ 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	2021	2022	2023	2024	2025
Central Hudson	30,187	30,465	28,484	29,414	28,595
Con Edison	116,897	117,509	105,681	105,977	105,743
Corning	5,398	4,934	5,056	4,616	4,635
NFG	129,056	123,288	125,808	118,379	119,446
KEDLI	136,705	126,559	120,822	123,913	130,990
KEDNY	100,391	105,211	105,497	110,074	104,831
NMPC	113,528	109,529	105,241	103,402	102,163
NYSEG	59,132	62,054	61,057	56,323	54,782
O&R	36,970	39,272	38,339	39,486	41,768
RG&E	74,266	72,400	69,090	66,405	72,173
Liberty	4,808	4,965	4,854	4,443	4,295
Total	808,652	797,613	765,858	762,521	769,421

Number of Damages due to Mismarks

LDCs	2021	2022	2023	2024	2025
Central Hudson	13	15	12	8	6
Con Edison	48	51	42	48	40
Corning	3	2	2	0	0
NFG	24	27	19	20	24
KEDLI	68	69	70	72	58
KEDNY	50	58	59	62	53
NMPC	38	38	35	33	21
NYSEG	19	20	18	9	33
O&R	21	9	14	20	12
RG&E	23	29	27	22	24
Liberty	1	0	1	0	0
Total	308	318	299	294	271

Appendix B (Continued)

Damages due to Mismarks per 1,000 Tickets

LDCs	2021	2022	2023	2024	2025
Central Hudson	0.43	0.49	0.42	0.27	0.21
Con Edison	0.41	0.43	0.40	0.45	0.38
Corning	0.56	0.41	0.40	0.00	0.00
NFG	0.19	0.22	0.15	0.17	0.20
KEDLI	0.50	0.55	0.58	0.58	0.44
KEDNY	0.50	0.55	0.56	0.56	0.51
NMPC	0.33	0.35	0.33	0.32	0.21
NYSEG	0.32	0.32	0.29	0.16	0.60
O&R	0.57	0.23	0.37	0.51	0.29
RG&E	0.31	0.40	0.39	0.33	0.33
Liberty	0.21	0.00	0.21	0.00	0.00

Number of Damages due to No-calls

LDCs	2021	2022	2023	2024	2025
Central Hudson	8	10	6	9	5
Con Edison	31	27	49	20	20
Corning	3	2	0	0	4
NFG	37	44	41	42	34
KEDLI	97	82	81	89	65
KEDNY	21	21	15	24	11
NMPC	36	28	26	21	30
NYSEG	19	12	12	8	10
O&R	30	27	17	14	13
RG&E	17	22	21	12	13
Liberty	3	0	4	0	0
Total	302	275	272	239	205

Appendix B (Continued)

Damages due to No-calls per 1,000 Tickets

LDCs	2021	2022	2023	2024	2025
Central Hudson	0.27	0.33	0.21	0.31	0.17
Con Edison	0.27	0.23	0.46	0.19	0.19
Corning	0.56	0.41	0.00	0.00	0.86
NFG	0.29	0.36	0.33	0.35	0.28
KEDLI	0.71	0.65	0.67	0.72	0.50
KEDNY	0.21	0.20	0.14	0.22	0.10
NMPC	0.32	0.26	0.25	0.20	0.29
NYSEG	0.32	0.19	0.20	0.14	0.18
O&R	0.81	0.69	0.44	0.35	0.31
RG&E	0.23	0.30	0.30	0.18	0.18
Liberty	0.62	0.00	0.82	0.00	0.00

Number of Damages due to Excavator Error

LDCs	2021	2022	2023	2024	2025
Central Hudson	12	11	4	16	10
Con Edison	56	52	55	55	48
Corning	7	6	7	6	5
NFG	108	112	103	104	92
KEDLI	122	154	121	108	104
KEDNY	99	105	122	105	99
NMPC	106	120	118	102	108
NYSEG	56	61	62	64	51
O&R	25	29	36	32	35
RG&E	40	49	66	41	56
Liberty	7	8	12	4	7
Total	638	707	706	630	615

Appendix B (Continued)

Damages due to Excavator Error per 1,000 Tickets

LDCs	2021	2022	2023	2024	2025
Central Hudson	0.40	0.36	0.14	0.54	0.35
Con Edison	0.48	0.44	0.52	0.52	0.45
Corning	1.30	1.22	1.38	1.30	1.08
NFG	0.84	0.91	0.82	0.88	0.77
KEDLI	0.89	1.22	1.00	0.87	0.79
KEDNY	0.99	1.00	1.16	0.95	0.94
NMPC	0.93	1.10	1.12	0.99	1.06
NYSEG	0.95	0.98	1.02	1.14	0.93
O&R	0.68	0.74	0.94	0.81	0.84
RG&E	0.54	0.68	0.96	0.62	0.78
Liberty	1.46	1.61	2.47	0.90	1.63

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

LDCs	2021	2022	2023	2024	2025
Central Hudson	9	3	9	5	4
Con Edison	11	13	11	20	15
Corning	0	1	0	0	0
NFG	3	3	1	5	5
KEDLI	13	9	7	13	28
KEDNY	4	5	1	3	3
NMPC	5	10	13	8	7
NYSEG	7	3	2	1	0
O&R	10	6	3	7	8
RG&E	2	6	1	4	4
Liberty	0	0	1	0	0
Total	64	59	49	66	74

Appendix B (Continued)

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

LDCs	2021	2022	2023	2024	2025
Central Hudson	0.30	0.10	0.32	0.17	0.14
Con Edison	0.09	0.11	0.10	0.19	0.14
Corning	0.00	0.20	0.00	0.00	0.00
NFG	0.02	0.02	0.01	0.04	0.04
KEDLI	0.10	0.07	0.06	0.10	0.21
KEDNY	0.04	0.05	0.01	0.03	0.03
NMPC	0.04	0.09	0.12	0.08	0.07
NYSEG	0.12	0.05	0.03	0.02	0.00
O&R	0.27	0.15	0.08	0.18	0.19
RG&E	0.03	0.08	0.01	0.06	0.06
Liberty	0.00	0.00	0.21	0.00	0.00

Number of Total Damages

LDCs	2021	2022	2023	2024	2025
Central Hudson	42	39	31	38	25
Con Edison	146	143	157	143	123
Corning	13	11	9	6	9
NFG	172	186	164	171	155
KEDLI	300	314	279	282	255
KEDNY	174	189	197	194	166
NMPC	185	196	192	164	166
NYSEG	101	96	94	82	94
O&R	86	71	70	73	68
RG&E	82	106	115	79	97
Liberty	11	8	18	4	7
Total	1,312	1,359	1,326	1,229	1,165

Appendix B (Continued)

Total Damages per 1,000 Tickets

LDCs	2021	2022	2023	2024	2025
Central Hudson	1.39	1.28	1.09	1.29	0.87
Con Edison	1.25	1.22	1.49	1.35	1.16
Corning	2.41	2.23	1.78	1.30	1.94
NFG	1.33	1.51	1.30	1.44	1.30
KEDLI	2.19	2.48	2.31	2.28	1.95
KEDNY	1.73	1.80	1.87	1.76	1.58
NMPC	1.63	1.79	1.82	1.59	1.62
NYSEG	1.71	1.55	1.54	1.46	1.72
O&R	2.33	1.81	1.83	1.85	1.63
RG&E	1.10	1.46	1.66	1.19	1.34
Liberty	2.29	1.61	3.71	0.90	1.63

Appendix C

Individual Damage Prevention Data²⁶

Central Hudson	2021	2022	2023	2024	2025	LDCs
Number of Tickets	30,187	30,465	28,484	29,414	28,595	769,421
Mismarks	0.43	0.49	0.42	0.27	0.21	0.35
No-Calls	0.27	0.33	0.21	0.31	0.17	0.27
Excavator Error	0.40	0.36	0.14	0.54	0.35	0.80
Co. and Co. Contractor Error	0.30	0.10	0.32	0.17	0.14	0.10
Total	1.39	1.28	1.09	1.29	0.87	1.51

Con Edison	2021	2022	2023	2024	2025	LDCs
Number of Tickets	116,897	117,509	105,681	105,977	105,743	769,421
Mismarks	0.41	0.43	0.40	0.45	0.38	0.35
No-Calls	0.27	0.23	0.46	0.19	0.19	0.27
Excavator Error	0.48	0.44	0.52	0.52	0.45	0.80
Co. and Co. Contractor Error	0.09	0.11	0.10	0.19	0.14	0.10
Total	1.25	1.22	1.49	1.35	1.16	1.51

Corning	2021	2022	2023	2024	2025	LDCs
Number of Tickets	5,398	4,934	5,056	4,616	4,635	769,421
Mismarks	0.56	0.41	0.40	0.00	0.00	0.35
No-Calls	0.56	0.41	0.00	0.00	0.86	0.27
Excavator Error	1.30	1.22	1.38	1.30	1.08	0.80
Co. and Co. Contractor Error	0.00	0.20	0.00	0.00	0.00	0.10
Total	2.41	2.23	1.78	1.30	1.94	1.51

²⁶ The total performance level may not equal the sum of the four metrics due to rounding.

Appendix C (Continued)

NFG	2021	2022	2023	2024	2025	LDCs
Number of Tickets	129,056	123,288	125,808	118,379	119,446	769,421
Mismarks	0.19	0.22	0.15	0.17	0.20	0.35
No-Calls	0.29	0.36	0.33	0.35	0.28	0.27
Excavator Error	0.84	0.91	0.82	0.88	0.77	0.80
Co. and Co. Contractor Error	0.02	0.02	0.01	0.04	0.04	0.10
Total	1.33	1.51	1.30	1.44	1.30	1.51

KEDLI	2021	2022	2023	2024	2025	LDCs
Number of Tickets	136,705	126,559	120,822	123,913	130,990	769,421
Mismarks	0.50	0.55	0.58	0.58	0.44	0.35
No-Calls	0.71	0.65	0.67	0.72	0.50	0.27
Excavator Error	0.89	1.22	1.00	0.87	0.79	0.80
Co. and Co. Contractor Error	0.10	0.07	0.06	0.10	0.21	0.10
Total	2.19	2.48	2.31	2.28	1.95	1.51

KEDNY	2021	2022	2023	2024	2025	LDCs
Number of Tickets	100,391	105,211	105,497	110,074	104,831	769,421
Mismarks	0.50	0.55	0.56	0.56	0.51	0.35
No-Calls	0.21	0.20	0.14	0.22	0.10	0.27
Excavator Error	0.99	1.00	1.16	0.95	0.94	0.80
Co. and Co. Contractor Error	0.04	0.04	0.01	0.03	0.03	0.10
Total	1.73	1.80	1.87	1.76	1.58	1.51

Appendix C (Continued)

NMPC	2021	2022	2023	2024	2025	LDCs
Number of Tickets	113,528	109,529	105,241	103,402	102,163	769,421
Mismarks	0.33	0.35	0.33	0.32	0.21	0.35
No-Calls	0.32	0.26	0.25	0.20	0.29	0.27
Excavator Error	0.93	1.10	1.12	0.99	1.06	0.80
Co. and Co. Contractor Error	0.04	0.09	0.12	0.08	0.07	0.10
Total	1.63	1.79	1.82	1.59	1.62	1.51

NYSEG	2021	2022	2023	2024	2025	LDCs
Number of Tickets	59,132	62,054	61,057	56,323	54,782	769,421
Mismarks	0.32	0.32	0.29	0.16	0.60	0.35
No-Calls	0.32	0.19	0.20	0.14	0.18	0.27
Excavator Error	0.95	0.98	1.02	1.14	0.93	0.80
Co. and Co. Contractor Error	0.12	0.05	0.03	0.02	0.00	0.10
Total	1.71	1.55	1.54	1.46	1.72	1.51

O&R	2021	2022	2023	2024	2025	LDCs
Number of Tickets	36,970	39,272	38,339	39,486	41,768	769,421
Mismarks	0.57	0.23	0.37	0.51	0.29	0.35
No-Calls	0.81	0.69	0.44	0.35	0.31	0.27
Excavator Error	0.68	0.74	0.94	0.81	0.84	0.80
Co. and Co. Contractor Error	0.27	0.15	0.08	0.18	0.19	0.10
Total	2.33	1.81	1.83	1.85	1.63	1.51

Appendix C (Continued)

RG&E	2021	2022	2023	2024	2025	LDCs
Number of Tickets	74,266	72,400	69,090	66,405	72,173	769,421
Mismarks	0.31	0.40	0.39	0.33	0.33	0.35
No-Calls	0.23	0.30	0.30	0.18	0.18	0.27
Excavator Error	0.54	0.68	0.96	0.62	0.78	0.80
Co. and Co. Contractor Error	0.03	0.08	0.01	0.06	0.06	0.10
Total	1.10	1.46	1.66	1.19	1.34	1.51

Liberty	2021	2022	2023	2024	2025	LDCs
Number of Tickets	4,808	4,965	4,854	4,443	4,295	769,421
Mismarks	0.21	0.00	0.21	0.00	0.00	0.35
No-Calls	0.62	0.00	0.82	0.00	0.00	0.27
Excavator Error	1.46	1.61	2.47	0.90	1.63	0.80
Co. and Co. Contractor Error	0.00	0.00	0.21	0.00	0.00	0.10
Total	2.29	1.61	3.71	0.90	1.63	1.51

Appendix D

Emergency Response Times for 45 Minutes (%)

LDCs	2021	2022	2023	2024	2025
Central Hudson	99.1	99.4	99.6	99.6	99.5
Con Edison	99.2	99.9	99.8	99.8	99.9
Corning	97.0	96.5	95.3	96.8	93.8
NFG	99.3	96.4	99.4	99.3	99.3
KEDLI	96.9	95.4	96.6	96.1	96.6
KEDNY	95.6	95.3	95.3	95.8	95.1
NMPC	95.7	94.9	94.3	94.4	94.4
NYSEG	96.3	95.6	96.6	93.4	94.5
O&R	99.0	97.9	98.6	98.7	98.7
RG&E	98.2	97.9	97.9	90.2	92.0
Liberty	93.5	91.4	92.6	95.9	94.8

Appendix E

Emergency Response Times for 60 Minutes (%)

LDCs	2021	2022	2023	2024	2025
Central Hudson	99.9	99.9	99.9	99.9	99.9
Con Edison	99.4	99.9	99.9	99.9	99.9
Corning	98.5	98.8	98.6	99.5	97.1
NFG	99.9	97.2	99.9	99.8	99.9
KEDLI	99.5	98.8	99.5	99.5	99.7
KEDNY	98.9	98.8	98.8	98.7	98.6
NMPC	98.3	98.3	98.2	98.3	98.7
NYSEG	99.1	99.0	99.3	98.6	98.9
O&R	99.9	99.9	99.9	99.9	99.9
RG&E	99.7	99.6	99.5	96.2	96.7
Liberty	98.5	97.4	97.6	99.7	98.8

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	23	0	0	49	9	38	0	0
Con Edison	1,799	602	0	226	98	2,119	0	0
Corning	6	2	0	8	6	0	0	0
NFG	553	0	0	91	47	49	0	4
KEDLI	386	38	0	3	78	113	0	0
KEDNY	145	0	0	57	9	1,475	0	0
NMPC	6	6	0	52	23	88	0	0
NYSEG	2	0	0	26	20	2	0	0
O&R	38	0	0	10	26	0	0	0
RG&E	1	0	0	57	27	1	0	0
Liberty	0	0	0	0	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	26	0	0	84	50	20	0	0
Con Edison	787	213	0	768	348	0	133	0
Corning	4	2	0	4	15	0	0	0
NFG	130	0	0	62	261	0	0	6
KEDLI	430	32	8	2	151	1	7	0
KEDNY	177	0	0	189	293	13	122	0
NMPC	22	15	0	156	99	4	9	0
NYSEG	6	0	0	21	103	0	0	1
O&R	99	0	0	14	110	0	0	0
RG&E	2	0	0	107	191	0	0	0
Liberty	0	0	0	1	0	0	0	0

Appendix H

Backlog of Potentially Hazardous Leaks

LDCs	2021	2022	2023	2024	2025
Central Hudson	1	3	0	1	0
Con Edison	5	7	6	5	10
Corning	3	2	2	1	1
NFG	2	0	0	0	0
KEDLI	3	8	4	3	2
KEDNY	20	10	14	14	2
NMPC	6	9	4	3	6
NYSEG	1	2	3	0	0
O&R	0	0	0	0	0
RG&E	0	1	0	1	0
Liberty	1	0	0	0	0

Appendix I

Repaired Potentially Hazardous Leaks

LDCs	2021	2022	2023	2024	2025
Central Hudson	198	184	156	177	169
Con Edison	6,869	5,322	5,116	4,072	4,486
Corning	66	39	39	9	21
NFG	839	776	696	623	641
KEDLI	1,048	921	984	1,018	873
KEDNY	2,399	2,745	2,782	2,930	2,262
NMPC	446	405	348	289	334
NYSEG	83	71	101	139	103
O&R	177	204	157	146	145
RG&E	142	144	128	129	198
Liberty	4	1	2	2	1

Appendix J

Discovered Potentially Hazardous Leaks

LDCs	2021	2022	2023	2024	2025
Central Hudson	176	172	140	157	161
Con Edison	3,738	2,924	2,345	2,144	2,178
Corning	67	45	38	14	21
NFG	831	772	694	620	639
KEDLI	1,050	819	485	1,052	999
KEDNY	2,317	2,367	2,543	2,195	2,136
NMPC	528	545	555	512	439
NYSEG	98	104	123	142	106
O&R	178	204	155	150	145
RG&E	165	192	136	143	203
Liberty	4	1	2	2	1

Appendix K

Backlog of Total Leaks

LDCs	2021	2022	2023	2024	2025
Central Hudson	47	62	40	37	26
Con Edison	137	107	103	93	89
Corning	40	32	21	12	12
NFG	297	209	115	46	60
KEDLI	5,494	4,671	3,875	2,078	1,716
KEDNY	1,779	1,627	1,485	1,052	954
NMPC	648	594	502	434	362
NYSEG	3	9	5	3	1
O&R	2	2	0	3	2
RG&E	6	9	5	6	3
Liberty	1	0	0	0	0

Appendix L

System Totals (Mains and Services)

Year	Steel (in Miles)			
	Unprotected		Protected	
	Bare	Coated	Bare	Coated
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	6,493	3,113	319	17,583
2022	6,304	3,046	301	17,326
2023	5,947	2,961	288	17,343
2024	5,632	2,971	283	17,411
2025	5,234	2,937	272	16,716

Appendix L (Continued)

System Totals (Mains and Services)

Year	Plastic (in Miles)	Cast and Wrought Iron (in Miles)	Copper (in Miles)	Other (in Miles)
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	56,978	2,826	1,281	87
2022	57,480	2,661	1,205	109
2023	58,412	2,522	1,142	97
2024	60,022	2,210	1,119	76
2025	60,550	2,210	1,115	86

Appendix L (Continued)

System Totals (Mains and Services)

Year	Average Service Length (in Feet)	Number of Services	System Totals (in Miles)
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	67.15	3,297,764	88,680
2022	66.41	3,286,874	89,431
2023	66.81	3,293,769	88,713
2024	68.38	3,300,440	89,945
2025	66.38	3,322,879	89,120

Appendix M

Instances of High-Risk Noncompliance Identified through Audit Process

LDCs	2020	2021	2022	2023	2024	# of OHQs
Central Hudson	5	9	13	5	1	5
Con Edison	30	3	17	47	56	5
Corning	13	12	7	47	26	1
NFG	56	26	76	32	33	9
KEDLI	11	0	11	14	13	3
KEDNY	24	51	75	21	22	3
NMPC	74	17	164	43	70	10
NYSEG	338	64	229	103	180	13
O&R	5	12	3	2	4	2
RG&E	52	17	23	49	78	1
Liberty	2	5	24	20	5	1

Appendix N

Instances of Other Risk Noncompliance Identified through Audit Process

LDCs	2020	2021	2022	2023	2024	# of OHQs
Central Hudson	124	0	6	2	1	5
Con Edison	97	1	38	187	2	5
Corning	32	16	24	51	40	1
NFG	243	55	10	16	12	9
KEDLI	79	0	32	0	2	3
KEDNY	61	17	17	40	6	3
NMPC	117	29	17	30	34	10
NYSEG	109	345	32	89	300	13
O&R	37	10	7	0	1	2
RG&E	13	106	9	100	135	1
Liberty	4	1	14	11	29	1