

**NEW YORK STATE
PUBLIC SERVICE COMMISSION**

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In the Matter of :
 :
HUDSON TRANSMISSION PARTNERS, LLC :
 : Case No. 04-M-0159
Petition to Amend the Electric Safety Standards :
to Provide for Special Testing, Recordkeeping :
and Mitigation Requirements Applicable to the :
Y56 345kVAC Cable Transition Joint on West :
52d Street in Manhattan or in the Alternative for :
a Declaratory Ruling Waiving Application of the :
Electric Safety Standards to Specific Facts :
----- X

**PETITION TO AMEND THE ELECTRIC SAFETY STANDARDS TO PROVIDE FOR
SPECIAL TESTING, RECORDKEEPING AND MITIGATION REQUIREMENTS
APPLICABLE TO THE Y56 345KVAC CABLE TRANSITION JOINT ON WEST 52D
STREET IN MANHATTAN OR IN THE ALTERNATIVE FOR A DECLARATORY
RULING WAIVING APPLICATION OF THE ELECTRIC SAFETY STANDARDS TO
SPECIFIC FACTS**

Dated: March 17, 2025
Albany, New York

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I. INTRODUCTION

Hudson Transmission Partners, LLC (Hudson) submits this petition seeking an order by the New York Public Service Commission (Commission) amending the Electric Safety Standards as described herein, or in the alternative a Declaratory Ruling pursuant to Part 8 of the Commission regulations (16 NYCRR Part 8) waiving the guarding requirements of ESS §3(h) as they have been applied to the cable transition joint at the north side of W.52d St. east of 12th Avenue, Manhattan, NY (Site). This Petition arises from normal operating voltage conditions at the Site, where Hudson’s Y56 345kVAC cable transition joint is located. The text of the Commission’s Electric Safety Standards requires that “[a]ny facility for which a voltage finding is discovered shall be guarded by the utility immediately and continuously until the utility has performed mitigation and made the area safe.” ESS §3(h). The normal operating voltage findings present at the Site have necessitated guarding by Consolidated Edison Company despite extensive mitigation by Hudson and the absence of public safety concerns. The site-specific

voltage conditions described herein merit special testing measures for stray voltage conditions. Applied in their present form, the ESS require periodic guarding by utility personnel even though as also described herein no public safety risks are present. Requiring the mitigation called for by the ESS under these circumstances is unnecessary, because no further mitigation is required or possible and the site presents no safety risk to the public.

Hudson respectfully requests that the Commission amend the ESS to incorporate the proposed special measurement and recordkeeping protocols included as Exhibit A hereto, in recognition of the facts that (1) the voltage conditions at the Site are a result of normal operations and do not fall within the definition of “Stray Voltage” under ESS § 1(c); and (2) the conditions at the Site do not pose a danger to the public due to Hudson’s extensive mitigation efforts under ESS §3(h). The protocols included in Exhibit A that Hudson urge be adopted account for these site-specific conditions.

In the alternative, Hudson respectfully seeks a Declaratory Ruling effectively waiving the continued guarding requirements of ESS §3(h) at the Site for the same reasons referenced above.

II. BACKGROUND

The Hudson facility (Y56 Cable) is a 660 MW electric transmission link between New York City and the PJM Interconnection. The Y56 Cable is an entirely underground and underwater transmission line. The route begins at the Hudson’s Converter Station in Ridgefield, New Jersey, where it interconnects with the PJM Interconnection at a PSE&G substation. The Y56 Cable is buried beneath the Hudson River for approximately three-and-a-half miles to a landfall point near Pier 92 in Manhattan. From there the cable is routed beneath W. 52nd Street and the West Side Highway and ultimately into the Con Edison W. 49th Street Substation.

Within W. 52nd Street between 11th and 12th Avenues, the submarine cable is spliced to its upland cable counterpart in a transition vault, (*i.e.*, Site), where the Y56 Cable has

intermittently produced an elevated voltage condition since 2018. These ambient low voltage measurements are a result of the system's normal operation; numerous inspections and investigations have confirmed that there is no physical defect or deficiency in the Y56 Cable system. At times, however, these low voltages rise to the level of the ESS definition of "Findings" as outlined in Section 1(f) (> 1 volt). This in turn triggers the action required by ESS §3(h), that the Site "shall be guarded by the utility immediately and continuously."

There have been no public shock reports at the Site in the over eleven years of Y56 Cable operation. Despite this, Hudson has performed extensive mitigation at the Site. Potential contact surfaces related to the Y56 transition joint have been replaced or covered with nonconductive material, further reducing the potential for human or animal contacts with the Y56 Cable. However, even following these extensive mitigation efforts and the absence of any danger to the public, the ESS requires that the Site be continuously guarded when these low normal operating voltage readings are present.

III. REQUEST FOR ESS AMENDMENT

A. Based on the facts reported below, Hudson requests that the Commission amend the ESS.

While Hudson acknowledges that the electrical readings present at the Site are accurately classified as a "Finding" as defined in ESS §1(f), the condition present does not fall within the scope of the conditions contemplated by ESS's scheme of Stray Voltage mitigation. "Stray Voltage," as defined in ESS §1(c), consists of irregular voltage conditions on electric facilities resulting from causes such as "damaged cables, deteriorated, frayed or missing insulation, improper maintenance, or improper installation."

Extensive testing conducted by both Hudson and Con Edison indicates that the voltage readings at the Site do not result from any of the above-referenced causes. Hudson commissioned an independent engineer to test and assess the voltage conditions at the Site. The

engineer's report is attached as Exhibit B. Testing indicates that the voltage condition is not a result of faults on (or within) Hudson's equipment or facilities. Exhibit B at 31. Rather, the probable cause of the voltage condition at the site is an increase in ground potential (*i.e.*, ground voltage) at the cable transition facilities due to normal use and delivery of electric power. *Id.*

The ESS requires testing for conditions created by facilities and equipment that have deteriorated or been damaged, the repair or replacement of those facilities, and the safeguarding of the public while this remediation is conducted. Application of the safeguarding requirements where the conditions described above have been demonstrated not to be present and where public safety is not at stake does not serve the Commission's purpose in adopting the ESS.¹ Extensive testing has revealed the voltage finding at the site to be a result of the normal operation of the Y56 Cable and not due to any internal flaw or condition of the cable. Exhibit B at 31. The absence of any repair or remedial work to be conducted at the Site frustrates the purpose of the ESS Stray Voltage regulatory scheme, as the voltage condition cannot be eliminated by any action of Hudson. Any further modification by Hudson or Con Edison of their facilities would not eliminate this ground potential in the vicinity of the Site, which would continue to produce readings which trigger the guarding requirement necessitated by the ESS.

B. The Conditions at the Site Do Not Pose a Danger to The Public Due to Hudson's Extensive Mitigation Efforts Under ESS §3(h)

In response to the voltage readings, Hudson has taken the measures required to eliminate risk to the public. The ESS prioritizes the mitigation of conditions which pose an actual or

¹ "In the event stray voltage is detected during testing or an inspection, Staff proposes that the utility guard the facility until the condition is made safe. In cases where utility-owned facilities are determined to be the cause of the stray voltage conditions, the utility should be required to make permanent repairs within 45 days." Case 04-M-0159, Proceeding on Motion of the Commission to Examine the Safety of Electric Transmission and Distribution Systems, *Order Instituting Safety Standards* (issued and effective January 5, 2005) at 20.

"In this proceeding we have consistently used that term [stray voltage] to mean voltage conditions on electric facilities that should not ordinarily exist. These conditions may be due to one or more factors, including, but not limited to, damaged cables, deteriorated, frayed or missing insulation, improper maintenance, or improper installation." *Id.* p. 3.

imminent safety hazard to the public or pose a serious and immediate threat to the delivery of power. The readings at the Site do not implicate either of these concerns. The Site has been in operation for over eleven years, during which no public safety complaints or reports of shock or injury have been made relating to the Site.

Despite this, Hudson has replaced (or covered), five metallic items in the vicinity of the W. 52nd St. cable transition that had been exhibiting intermittent elevated voltage above one volt. Hudson replaced a link box handhole frame and cover, fiber optic handhole frame and cover, and truck loading zone signpost with composite non-metallic equivalents. Exhibit B at 20. Hudson also installed plastic covers over a set of steel fire hydrant bollards next to the Site. Id. Additionally, Hudson painted the metallic curb in the vicinity of the cable transition with a non-conductive coating. Id. These non-metallic equivalents and coverings are poor conductors of electricity, and further reduce any potential risk to the public.

These efforts by Hudson have further mitigated any danger to the public at the Site. Due to this, Site conditions need only be subject to future passive monitoring and maintenance activities, not the costly safeguarding currently mandated by ESS §3(h). This is in line with the broader intent of the ESS to find and repair Stray Voltage defects which could create a safety issue, while not spending valuable resources on normally occurring and safe low-voltage conditions.

IV. HUDSON PROPOSES THAT A NEW SUBSECTION BE ADDED TO THE ESS TO APPLY SPECIFICALLY TO THE Y56 CABLE.

Following consultations with Department of Public Service staff engineers and with personnel of the Electric Power Research Institute, Hudson's electric engineers met to develop a testing protocol and voltage threshold to ensure conditions at the Site continue to pose no public safety hazard. The protocols and associated recordkeeping form are included in Exhibit A. Under

proposed new Section 3, subsection (l) (i) Hudson will annually inspect the Y56 Cable transition joint for defects and evidence of deterioration, (ii) Con Edison, as part of its stray voltage testing program, will conduct a diagnostic test at the Site to determine if voltage conditions remain stable, *i.e.*, within the historic range, and a “step and touch” simulation test to determine if any public safety risk is present. Measurements will be taken at the points identified in Exhibit A. If readings taken by Con Edison exceed the levels identified in Exhibit A in either test, Con Edison will notify Hudson and Hudson will respond as required by the terms of Exhibit A, which could include active, continuous safeguarding. The voltage readings taken by Con Edison will be recorded on the form included in Exhibit A, page 2.

V. REQUEST FOR DECLARATORY RULING

In the alternative, Hudson requests a ruling waiving application of the continuous guarding requirements of ESS §3(h) to the Site. The Commission may issue declaratory rulings regarding “the applicability to any person, property, or state of facts of any rule or statute enforceable by the Commission or the validity of any such rule” or “whenever the Commission determines it is warranted by the public interest.” 16 NYCRR § 8.1.

As described in Section III(B) of this petition, Hudson has taken extensive measures to eliminate potential risk to the public at the Site and will commit to comply with the protocols presented in Exhibit A Hudson proposes be adopted. Hudson’s mitigation efforts have effectively eliminated dangers relating to Site voltage readings. The ESS prioritizes the mitigation of conditions which pose actual or imminent safety hazards to the public or present a serious and immediate threat to the delivery of power. Current Site conditions do not implicate either of these concerns, which frustrates the regulatory goals of the ESS by the continued application of its requirements. The Site has operated for over eleven years, during which no

public safety complaints or reports of shock or injury have been made relating to the Site. The proposed protocols will ensure the Site's safety is maintained.

Continued application of ESS §3(h) requirements to the Site is not warranted by the public interest nor in alignment with the stated goals of the ESS. A waiver from the ESS guarding requirements will allow Hudson to conduct appropriate future passive monitoring and maintenance activities described in Section IV of this petition, rather than the costly safeguarding currently mandated by ESS §3(h). This aligns with the broader intent of the ESS to find and repair Stray Voltage defects which pose genuine safety issues to the public, while not expending valuable resources on normally occurring and safe low-voltage conditions.

VI. CONCLUSION

For the reasons explained herein, Hudson Transmission Partners LLC respectfully asks the Commission to amend the ESS as described herein, or in the alternative to issue a Declaratory Ruling waiving application of the guarding requirements outlined in ESS Appendix A, §3(h) to its W. 52nd St. Site.

Dated: March 17, 2025
Albany, New York

/s/ John W. Dax

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EXHIBIT A

Y 56 VOLTAGE ESS MEASUREMENT PROTOCOLS

PROPOSED 5 01-15-25

Y 56 VOLTAGE ESS MEASUREMENT PROTOCOLS

Sec. 3 (I) Response to Neutral-to-Earth (NEV) Stray Voltage Condition due to Normal Operation of Electric Facilities on W.52nd St:

1. Diagnostic Measurement: Is the condition behavior stable?

This will be done by ConEdison personnel on a routine basis and will follow standard ESS protocol (a voltmeter with 500-ohm shunt resistor) to a qualified reference ground. This is to ensure the energized objects remain within the known range of values that we have observed historically, ranging from 0 to 7 VAC. If the voltage reading exceeds the known range, ConEd will contact Hudson Transmission Partners LLC (HTP) to come to W 52nd St. to inspect the Y 56 equipment and take in-service voltage and current measurements to ensure the equipment is free of defects or faults.

2. Step and Touch Potential Severity (Safety) Assessment: Is there a safety risk?

This will also be done by ConEdison personnel to assess the voltage exposure using point-to-point measurements that simulate step and touch potential. The threshold of concern is 3.5 VAC point-to-point. If a voltage of concern is found (above the threshold established 3.5 VAC), ConEd will guard and contact HTP to follow-up. When HTP responds, responsibility for further guarding and/or mitigating interventions will be transferred to HTP. This is now a low probability scenario, less likely to occur because of the mitigations implemented by HTP (non-conductive casting, covers and coatings).

3. Annual Inspection of HTP Equipment: Is the equipment free of defect and/or faults?

This will be done by HTP to ensure their equipment is free of defects or faults. Measurements made by HTP will be recorded on copies of the form appended to the ESS entitled "Y56 at W 52nd St. Voltage Measurement."

Y56 at W 52nd St. Voltage Measurement

Measurement Location: West 52nd Street (NY) Record Sheet: 1 of 1 Measurements performed by (Name(s)):		Date:	
		Ambient Temperature (°F):	
		Weather ¹:	
		Soil Conditions ²: <small>(circle one)</small> Dry / Normal / Moist / Saturated	
HTP Transmission (MW):			
Connection Point #1	Connection Point #2	Voltage	Time
V00 - Ground rod	V07 – Linkbox Bonding Cable Lug (Exterior of Linkbox)		
	V08 – Bare Ground Conductor (In Linkbox Handhole)		
V07 – Linkbox Bonding Cable Lug (Exterior of Linkbox)	V08 – Bare Ground Conductor (In Linkbox Handhole)		
Comments:			

EXHIBIT B

Investigation of Stray Voltage at
W 52nd Street New York, NY

Investigation of Stray Voltage at W 52nd Street New York, NY

For: PowerBridge - Hudson Transmission Project
Attention: E. Griggs

CONTAINS CLIENT CONFIDENTIAL INFORMATION



Client	PowerBridge, LLC
Client Reference	JU9953
PSC Reference	JU9953 RPT1
Revision	0
PSC Group Company	North America
Prepared by	Jed Leighfield
Date	July 31, 2024



Executive Summary

Power Systems Consultants (“PSC”) was retained by the Hudson Transmission Project (the “Client”) to investigate an ongoing possible stray voltage issue at the project’s New York City 345 kV cable landfall cable transition joint. The potential stray voltage concern had been first identified by the Consolidated Edison Company (“ConEd”) during their annual system-wide contact voltage detection program.

PSC performed a complete review of Client-provided information that included: reports, technical specification, field test results, design documents, presentations, and other information related to the possible stray voltage condition at the New York cable landfall. In addition to the review of project related information, PSC also had discussions with the Client staff regarding the details of the possible issue.

As part of the analysis, PSC provided recommendations to the Client for additional field measurements and recordings to be taken to determine the apparent cause of the possible stray voltage and to verify there were no electrical faults within the Client-owned equipment. The additional measurements were taken at both the New York (West 52nd St.) and New Jersey (Edgewater Commons) cable landfall transition(s) and the Ridgefield converter station over a period of several weeks. The measurements included: touch and step voltage, current, voltage recording, waveform captures, power quality (at the Ridgefield converter); in addition to other testing. These measurements were taken during different power transmission levels and while the Client facility was de-energized.

Based on extensive review and analysis of the data provided in the development of this report, the probable cause of the stray voltage at the Hudson Transmission Project New York City 345 kV cable landfall is an increase in ground potential (i.e. ground voltage) at the cable transition facilities due to normal use and delivery of electric power. The stray voltage is not a result of faults on (or within) the Client-owned equipment or facilities.



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1. Introduction

Power Systems Consultants – North America (“PSC”) was retained by the Hudson Transmission Project (“HTP” or the “Client”) in January 2023 to investigate an ongoing potential stray voltage issue occurring at the New York city cable landfall cable transition of the Hudson Transmission 345kV (“Y56” or “cable system”) cable under West 52nd Street (“West 52nd St. cable transition”).

HTP requested PSC support for a possible stray voltage issue at the West 52nd St. landfall cable transition by: (1) reviewing all the work that was previous performed, (2) providing recommendations for additional investigation, (3) recommending and evaluating field measurements, (4) identify the possible cause or source of the elevated voltage, and (5) recommend possible mitigation measures, if applicable.

When used in this report, the term “stray voltage” has the meaning defined by IEEE Std. 1695-2016 [1] described below:

stray voltage: “a voltage resulting from the normal delivery or use of electricity that may be present between two conductive surfaces that can be simultaneously contacted by members of the general public or animals. Stray voltage is not related to electrical faults.”

It should be noted that the New York State Public Service Commission Electric Safety Standards¹ [2] defines the term ‘Stray Voltage’ similar to the meaning of “contact voltage” as defined in IEEE Std. 1695-2016 as described below:

contact voltage: “a voltage resulting from electrical faults that may be present between two conductive surfaces that can be simultaneously contacted by members of the general public or animals. Contact voltage can exist at levels that may be hazardous.”

For clarification, the term “contact voltage”, when used in the context of this report, describes a situation where a voltage is present between two conductive surfaces that can be simultaneously contacted by members of the general public or animals that is result of an electrical fault (from deteriorated, frayed, or missing insulation), improper maintenance, or improper installation of an electric facility.

1.1. Background

The Consolidated Edison Company of New York (“ConEd”) is the local utility that operates the electric transmission and distribution system facilities in the vicinity of the HTP West 52nd St. cable transition. The New York State Public Service Commission (“NYSPSC”) Electric Safety Standards [2] (“Safety Standards”) requires that utilities conduct an annual system-wide voltage detection program for underground assets and conduct five-year equipment inspection program to mitigate any contact voltage risks to the public.

ConEd employs the use of mobile contact voltage detection technology (“mobile voltage detector”) to identify potential contact voltage hazards as required by the NYSPSC Safety Standards. The mobile voltage detector is designed to detect the low-level electric fields that emanate from the surfaces of structures that have voltage present due to an underground distribution system fault (contact voltage condition) or other electric fields, such as from stray voltage sources.

¹ New York State Public Service Commission Electric Safety Standards [2]: Appendix A Section 1(c).



When the mobile voltage detector identifies an elevated electric field condition, the detector operator confirms the source of the electric field by making a physical measurement with a voltmeter. The physical voltage measurement is taken from a reference point such as a fence, sign post, fire hydrant, or other conductive metal object that has good contact with earth, and the suspected electric utility infrastructure that has the alleged elevated voltage. Any manholes, service boxes, transformer vaults, lamp posts, or other exposed surfaces of electric utility facilities accessible to the public with a measured voltage greater than or equal to one (1) volt², is remedied per the requirements of the NYSPSC Safety Standards.

ConEd has intermittently identified elevated voltage conditions on the Client-owned equipment covers located in the sidewalk at the HTP West 52nd St. cable transition. This elevated voltage condition has been detected by ConEd since the beginning of commercial operation of HTP in 2014³. The elevated voltage on the equipment covers is most apparent when making a voltage measurement between the equipment covers and a fire hydrant located approximately sixty-six (66) feet to the west.

1.2. Previous Work

ConEd and HTP have performed numerous measurements as part of the intermittent elevated voltage issue at the West 52nd St. cable transition. Many of the measurements were associated with ConEd's activities related to the system-wide voltage detection program.

HTP contracted with TECHIMP US Corporation ("TECHIMP") to perform stray voltage tests on the Y56 transmission line facilities. TECHIMP performed measurements at the West 52nd St. cable transition on July 16, 2020 [3], October 28, 2020 [4], and December 21, 2020 [5]. No measured voltages exceeded the one (1) volt threshold during the TECHIMP field activities.

In October of 2022 ConEd, performed a more detailed investigation [6] of the intermittent potential stray voltage condition at the West 52nd St. cable transition. The testing performed by ConEd included de-energization of the local distribution system while concurrently monitoring for the elevated voltage. The testing also included measuring the resistance between the West 49th St. substation ground grid and the West 52nd St. cable transition ground grid.

The results of the investigation concluded there was a strong correlation between the operation of HTP Y56 transmission line and the presence of a potential stray voltage on the West 52nd St. cable transition facilities. No correlation could be made between the operation of the ConEd distribution system, possible degradation of the ground continuity conductors⁴ between West 49th St. substation and West 52nd St. cable transition ground grids, and the existence of the intermittent potential stray voltage at West 52nd St.

² New York State Public Service Commission Electric Safety Standards [2]: Appendix A Section 1(f).

³ The intermittent elevated voltage condition at the West 52nd Street cable transition has been present even after the replacement of the original self-contained fluid-filled (SCFF) submarine cables with cross-linked polyethylene (XLPE) insulated submarine cables. The replacement took place in 2017.

⁴ See [Section 2.2](#) regarding the ground continuity conductors.



5.3. Ground Grid Testing

Ground grid testing was performed at the West 52nd St. cable transition ground grid on June 1, 2023, to verify its integrity. Comparison of the most recent results, shown in [Table 6](#), when compared with the past testing shows only a minor deviation.

Variations in test results can be caused by several factors such as, soil moisture content at the time of testing, or overall differences between test equipment manufacturers and is not an indication of potential issues.

Ground grid test results indicate there are no issues with the ground grid integrity. Therefore, the potential stray voltage condition is not a result of a failure of the ground grid, or its components.

5.4. Voltage Measurements

The numerous voltage measurements and recordings have given some insight into the probable cause of the potential stray condition at the West 52nd St. cable transition. The measurements have identified a localized increase of the earth voltage within the cable transition grounding grid(s) when referenced to metallic objects in contact with the earth that are not within the vicinity of the grounding grid(s). This local elevated voltage is found at both the West 52nd St. and Edgewater Commons cable transitions. The elevated voltage exists both when the cable system is transferring power and when the cable system is de-energized and grounded. [Table 7](#) provides a sample comparison of measured touch voltages at the West 52nd St cable transition during both power transfer and de-energized states.

West 52 nd St. Connection Points		Cable De-Energized	Power Transfer	
Connection 1	Connection 2	Voltage	Voltage	MW Transfer*
V09 – Link box handhole frame	V13 – Fence post	0.643	0.667	384
	V14 – Fire hydrant	0.471	4.150	
V10 – Fiber optic handhole frame	V13 – Fence post	0.716	0.697	
V11 – Sign post	V13 – Fence post	0.534	0.824	
	V14 – Fire hydrant	0.480	2.880	
V12 – Steel-faced curb	V13 – Fence post	0.710	0.651	
	V14 – Fire hydrant	0.518	3.330	384
V13 – Fence post	V14 – Fire hydrant	0.747	2.200	350R
V30 – Ground rod at 30 feet	V13 – Fence post	0.491	0.493	300
	V14 – Fire hydrant	0.549	1.500	325R
V60 – Ground rod at 60 feet	V00 – Reference ground rod	0.467	0.346	292R
	V11 – Sign post	0.494	0.413	288
	V12 – Steel-faced curb	0.466	0.333	292R
	V13 – Fence post	0.463	0.332	302R
	V14 – Fire hydrant	0.703	1.300	315R

* "R" indicates the project was changing megawatt flow (ramping) at the time of the voltage measurement.

Table 7 – West 52nd St. Voltage Comparisons During Power Transfer and De-Energized Conditions



The presence of voltage while the cable system is de-energized indicates the normal operation of HTP is not the only source of stray voltage. In some cases, the stray voltage is near the one (1) volt threshold even when the cable system is de-energized. This stray voltage phenomenon, with the cable system de-energized, also occurs at the Edgewater Commons cable transition as seen in the [Table 8](#).

Edgewater Commons Connection Points		Cable De-Energized	Power Transfer	
Connection 1	Connection 2	Voltage	Voltage	MW Transfer
V00 – Reference ground rod	V13 – Fence post	0.338	1.300	510
	V15 – Lamp post	0.312	1.500	510
V09 – Link box handhole frame	V13 – Fence post	0.508	1.600	660
	V15 – Lamp post	0.372	4.500	
V10 – Fiber optic handhole frame	V13 – Fence post	0.491	1.500	
	V14 – Fire hydrant	0.412	2.500	
	V15 – Lamp post	0.506	1.900	
V13 – Fence post	V15 – Lamp post	0.302	0.400	
V14 – Fire hydrant		0.529	1.700	
V60 – Ground rod at 60 feet		0.276	0.300	

Table 8 – Edgewater Commons Voltage Comparisons During Power Transfer and De-Energized Conditions

There is a direct correlation between the power transfer on the HTP cable system and the intermittent stray voltage at the cable transitions. The plots in [Figure 15](#), [Figure 16](#), and [Figure 17](#) shows the stray voltage at the West 52nd St. cable transition is directly related to the power transfer level on the cable system.