



Department of Public Service

Three Empire State Plaza, Albany, NY 12223-1350
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Public Service Commission

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Commissioners

December 12, 2023

Mr. Ross Turrini
Chief Operations Officer New York Gas
National Grid
25 Hub Dr.
Melville, NY 11747

Re: Niagara Mohawk Power Corporation d/b/a National Grid (National Grid) 2022 Negative Revenue Adjustment (NRA)

Dear Mr. Turrini,

The purpose of this letter is to notify you of the regulatory liability assessed to National Grid for its 2022 gas safety performance in accordance with the Joint Proposal in Case 20-G-0381, adopted in the Commission's January 20, 2022 Order in that case (gas safety performance metric).¹ National Grid is to incur a regulatory liability of 19 Basis Points² for its 2022 gas safety performance as measured by the gas safety performance metrics.

High Risk and Other Risk Level Safety Requirements

Each year the Department of Public Service staff (Staff) observes National Grid's operations and maintenance and construction activities (field audit). The details of any noncompliance (violation) of gas safety regulations, found in the 16 NYCRR Parts 255 and 261, observed by Staff are formally provided to the Company in a year end audit letter (field audit letter). Following the end of each year, Staff conducts an audit of the operations and maintenance records for that year (record audit) for compliance with 16 NYCRR Parts 255 and 261. The details of any noncompliance (violation) are formally provided to the Company in a letter (record audit letter). In each letter a written response is requested within 30 days from the Company outlining actions taken or to be taken to prevent future repeat violations.

At the conclusion of each audit, Staff presents its findings to the Company. The Company is given ten business days from the presentation of the findings to cure any identified document

¹ Pages 90 to 97 of the Joint Proposal in Order Adopting Terms of Joint Proposal and Establishing a Gas rate Plan, issued and effective January 20, 2022, in Case 20-G-0381, Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Niagara Mohawk Power Corporation d/b/a National Grid for Gas Service.

² All Basis Points are pre-tax Basis Points.

deficiencies by providing official Company records to Staff. Those findings, which Staff determines the provided official Company record cures the deficiency, do not appear in the audit letters.

Application of Metrics to National Grid's Audits

The 2022 compliance metric requires that for field audits, National Grid be assessed the following regulatory liabilities: one-half of a basis point for each of the first 20 high risk violations; one basis point for each high risk violation in excess of 20 violations; and one-quarter of a basis point for all other risk violations.

The 2022 compliance metric requires that for record audits, National Grid be assessed the following regulatory liabilities: one-half of a basis point for each high risk violation in excess of 5 but not more than 20 violations; one basis point for each high risk violation in excess of 20 violations; and one-quarter of a basis point for each other risk violation in excess of 15 violations.

The results of the audit of National Grid's 2022 field activities were provided to you in a letter dated December 21, 2022 (field audit letter). The results of the audit of National Grid's 2022 records were provided to you in a letter dated June 12, 2023 (records audit letter). The field audit letter identified 1 High Risk violation and 0 Other Risk violations. The records audit letter identified 163 High Risk violations, 17 Other Risk violations, and 2 Areas of Concern. The Company responded to the field audit letter on January 22, 2023, and to the records audit letter on July 13, 2023. After consideration of the audit letters and the company's responses to them, the NRA will be applied as detailed below.³

Please find attached Attachment A, the field audit letter and Attachment B, the records audit letter. Attachments A and B have been notated identifying the violations assigned to the 2022 High Risk and Other Risk Level Safety Requirement metric. High Risk violations have been identified by "NRA HR#" and Other Risk violations have been identified by "NRA OR#". Any violations that Staff determined should not be applied to this metrics have the notation "Removed from NRA".

Attachments A and B identify a total of 163 High Risk violations and 15 Other Risk violations to be applied to the metric. Based on the Joint Proposal adopted by the Commission in Case 20-G-0381, when the number of violations of a given code section exceed 10, the incurred NRA is limited to 10 violations per code section and requires that National Grid submit, within 90 days of the audit letter identifying the compliance deficiency, a remediation plan for the code section(s) with an excess of 10 violations. Application of the ten-cap resulted in 32 High Risk violations and 15 Other Risk violations being used to calculate the safety metric regulatory liability.⁴ The 1 High Risk Field Audit violation warrants a 1/2 Basis Point per violation revenue adjustment. The 31 High Risk Record Audit violations warrant a 0 Basis Point per violation revenue adjustment for the first 5 violations, a 1/2 Basis Point per violation for the next 15

³ NRA is an abbreviation for negative revenue adjustment which is an equivalent term often used to mean regulatory liability.

⁴ The cap was exceeded with regard to Section 255.603(d) with 36 violations, Section 255.723(b)(3) with 91 violations, and Section 261.17(a) with 34 violations prior to the application of the 10 cap.

violations and a 1 Basis Point per violation for the remaining 11 violations. The 15 Other Risk Record Audit violations warrant a 0 Basis Point per violation revenue adjustment. The 32 High Risk violations and the 15 Other Risk violations result in a total of 19 Basis Points regulatory liability being assessed for the 2022 High Risk and Other Risk Level Safety Requirement metric.

Staff will continue to audit National Grid in the future. Continued cooperation is appreciated. If you have any comments or questions I can be reached at (315) 448-7336.

Sincerely,



Kevin Speicher
Chief of Pipeline Safety
Office of Energy System Planning and
Performance

cc: Dennis DiBari, Chief, Office of Investigations and Enforcement
Brett T. Mahan, Utility Supervisor
Secretary, Case 20-G-0381



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***** ATTACHMENT A *****

December 21, 2022

Mark Prewitt
VP Gas Compliance
National Grid
300 Erie Blvd W.
Syracuse NY 13202

Re: Niagara Mohawk Power Corporation d/b/a National Grid (National Grid) – 2022 Gas Operations and Maintenance Field Audits

Dear Mr. Prewitt,

Enclosed for your review is the final report for the 2022 audit of National Grid’s gas operations and maintenance field activities prepared by staff of the New York State Department of Public Service, Office of Electric, Gas, and Water (Staff). The report specifically outlines an instance of non-compliance where National Grid failed to adhere to the requirements of 16 NYCRR Parts 255 and 261 during calendar year 2022.

Staff in the Albany and Syracuse field offices conducted the audit. Please note that Staff’s field audits were based on a sample review of operation and maintenance activities, incident notifications and construction activities. Staff presented its instance of noncompliance to National Grid management via an email on December 9, 2022. National Grid declined to have a formal compliance meeting because the instance of noncompliance had already been discussed during the record audit compliance meeting held on June 14, 2022. National Grid was afforded ten business days to document that the Company has cured any deficiencies identified in Staff’s findings presented at the compliance meetings.

The Violations Performance Measures in Case 20-G-0381 classifies violations as either “High Risk” or “Other Risk.” Therefore, the violations found in the audit have been separated into two attachments. Attachment 1 contains the details of the one “High Risk” violation. Attachment 2 contains zero “Other Risk” violations. Note that any violations occurring after March 29, 2013 may be subject to administrative enforcement actions by the Commission under the authority of PSL §25-a.

Please respond within 30 days of this letter detailing what actions National Grid will take or has taken to remediate the noted violation and to ensure future compliance.

***** ATTACHMENT A *****

Staff will continue to audit National Grid's operations and maintenance activities, emergency programs, construction activities and operator qualification programs during 2023. Continued cooperation is appreciated. If you have any questions regarding this letter or any other gas safety concerns, please call me at (315) 448-7336.

Sincerely,

Kevin Speicher
Chief of Pipeline Safety
Office of Electric, Gas, & Water

cc: Brett Mahan, Utility Supervisor

***** ATTACHMENT A *****

**Attachment 1
High Risk Violations
Violation Specifics**

Note: The use of the terms “violation(s)” and “occurrence(s)” in this attachment is for Pipeline and Hazardous Materials Safety Administration (PHMSA) reporting requirements. For the purpose of the Department of Public Service, “violation(s)” means “code section(s) violated” and “occurrence(s)” means “violation(s)” in this attachment.

Albany

Field Audits

One violation of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

16 NYCRR 255.603(d) – General Provisions – 1 Violation, 1 Occurrence

One violation of 255.603(d), which states that “Each operator shall satisfactorily conform with the program submitted.”

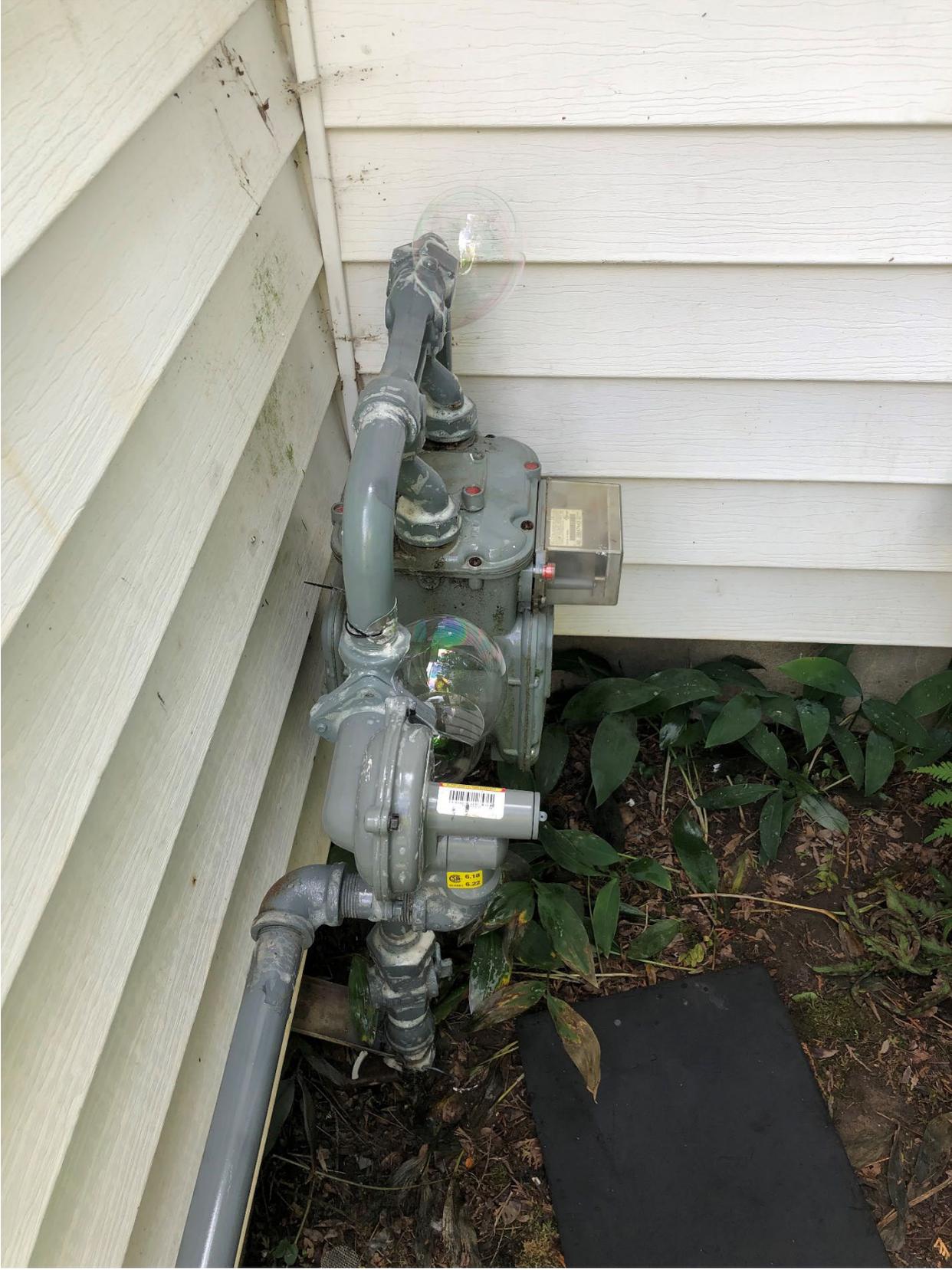
The following is cited as an example where this requirement was not met:

1. [REDACTED] – National Grid Albany failed to conform to CMS03004, Turn On and Turn Off Gas Meters, Revision 3. On 06/27/22, Staff investigated a customer complaint concerning a gas odor at [REDACTED]. The complainant stated that National Grid had been replacing gas mains and service lines in his neighborhood for about two months. He further explained that a National Grid Crew had worked on his service line a few weeks prior on 06/13/22 and after that work was completed, he could smell gas outside his house.

Staff immediately contacted the Company and met with a representative onsite to follow up. The representative conducted a leak survey and identified several leaks on the above grade gas piping both upstream and downstream of the customer’s meter (see photo below). Additionally, the representative found gas passing out of the service regulator vent.

Staff reviewed the “Gas Service Record” for this address and confirmed that work had been done there on 06/13/22. It’s understood that the work involved installing service piping, a new service regulator and reworking the meter header and associated piping. Based on the leaks found on 06/27/22, it’s evident that the Company failed to complete a thorough leak test of the service riser, meter header and associated piping prior to, and/or during, the meter turn on following the work completed on 06/13/22. **(NRA – HR#1)**

***** ATTACHMENT A *****



***** ATTACHMENT A *****

Glens Falls

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Gloversville

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Hudson

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Mohawk Valley

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Saratoga

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Schenectady

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Syracuse

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Troy

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Volney

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Watertown

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

***** ATTACHMENT A *****

**Attachment 2
Other Risk Violations
Violation Specifics**

Note: The use of the terms “violation(s)” and “occurrence(s)” in this attachment is for Pipeline and Hazardous Materials Safety Administration (PHMSA) reporting requirements. For the purpose of the Department of Public Service, “violation(s)” means “code section(s) violated” and “occurrence(s)” means “violation(s)” in this attachment.

Albany

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Glens Falls

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Gloversville

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Hudson

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Mohawk Valley

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Saratoga

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Schenectady

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Syracuse

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Troy

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

***** ATTACHMENT A *****

Volney

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Watertown

Field Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.



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***** ATTACHMENT B *****

June 12, 2023

Mark Prewitt
VP Gas Compliance
National Grid
300 Erie Blvd W.
Syracuse NY 13202

Re: Niagara Mohawk Power Corporation d/b/a National Grid (National Grid) – 2023 Audit of 2022 Gas Operations and Maintenance Records (2023 Records Audit).

Dear Mr. Prewitt,

Enclosed for your review is the final report for the 2023 audit of the Niagara Mohawk Power Corporation d/b/a National Grid (National Grid) gas operations and maintenance records prepared by the New York State Department of Public Service, Office of Electric, Gas, and Water (Staff). The report specifically outlines instances of non-compliance where National Grid failed to adhere to the requirements of 16 NYCRR Part 255 – Transmission and Distribution of Gas and 16 NYCRR Part 261 – Piping Beyond the Meter during the calendar year 2022.

Staff in the Albany and Syracuse offices conducted the audit of operations and maintenance records for 2022 for the National Grid Upstate service territory during the first half of 2023. Please note that Staff's audits were based on a review of a random sample of records from operation and maintenance activities. Staff discussed its findings of violations in detail with National Grid management during subsequent compliance meetings held on May 12, 2023 with the Albany Office and on May 17, 2023 with the Syracuse Office. National Grid was afforded ten business days to provide documentation to cure record deficiencies identified in Staff's findings presented at each of the compliance meetings.

The Violations Performance Measures in Case 20-G-0381 classifies violations as either "High Risk" or "Other Risk." Therefore, the violations found in the audit have been separated into two attachments. Attachment 1 contains the details of the 163 "High Risk" violations. Attachment 2 contains the details of the 17 "Other Risk" violations. Attachment 3 contains the details of 2 Areas of Concern. Note that any violations occurring after March 29, 2013 may be subject to administrative enforcement actions by the Commission under the authority of PSL §25-a.

***** ATTACHMENT B *****

Please respond within 30 days of this letter detailing what actions have and/or will be taken by National Grid to remediate noted violations and concerns, and to ensure future compliance.

Staff will continue to audit National Grid's operations and maintenance activities, emergency programs, construction activities, and operator qualification programs during 2023. Continued cooperation with Staff is appreciated. If you have any questions regarding this letter or any other gas safety concerns, please call me at (315) 448-7336.

Sincerely,

Kevin Speicher
Chief of Pipeline Safety
Office of Electric, Gas, & Water

Cc: Brett Mahan, Utility Supervisor
Dennis DiBari, Chief, Office of Investigations and Enforcement

***** ATTACHMENT B *****

Attachment 1
High Risk Violations
Violation Specifics

Note: The use of the terms “violation(s)” and “occurrence(s)” in this attachment is for Pipeline and Hazardous Materials Safety Administration (PHMSA) reporting requirements. For the purpose of the Department of Public Service, “violation(s)” means “code section(s) violated” and “occurrence(s)” means “violation(s)” in this attachment.

Albany
Record Audits

Two violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

16 NYCRR 255.603(d) – General Provisions – 1 Violation, 1 Occurrence

One violation of 255.603(d), which states that each operator shall satisfactorily conform with the program submitted.

The following is cited as an example where this requirement was not met:

1. Account #151265388 - National Grid Albany failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 9/8/22 and the meter was not locked. A site-specific analysis was performed on 10/12/22 and the meter was subsequently locked on 10/18/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#2)**

16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 8 Occurrences

One violation of 255.723(b)(3), which states, “If the operator employs leakage history to determine areas of active corrosion, the leakage survey frequency shall be at least once every 3 calendar years at intervals not exceeding 39 months on mains and service lines.”

The following are cited as examples where this requirement was not met:

1. Zone Map #190-973-09-12 – Records indicate that this pipe was surveyed on 9/18/17, and not again until 5/24/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#3)**
2. Zone Map #190-973-04-09 - Records indicate that this pipe was surveyed on 8/1/17, and not again until 5/31/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#4)**
3. Zone Map #190-975-03-07 - Records indicate that this pipe was surveyed on 7/17/17, and not again until 6/10/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#5)**

***** ATTACHMENT B *****

4. Zone Map #190-974-01-05 - Records indicate that this pipe was surveyed on 9/19/17, and not again until 7/27/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#6)**
5. Zone Map #190-974-03-01 - Records indicate that this pipe was surveyed on 9/18/17, and not again until 9/9/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#7)**
6. Zone Map #189-975-07-12 - Records indicate that this pipe was surveyed on 10/1/18, and not again until 10/6/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#8)**
7. Zone Map #189-976-07-04 - Records indicate that this pipe was surveyed on 9/20/18, and not again until 10/6/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#9)**
8. Zone Map #189-975-07-11 - Records indicate that this pipe was surveyed on 10/3/18, and not again until 10/7/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#10)**

Note: The technical violations bulleted above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

Glens Falls

Record Audits

Two violations of 16 NYCRR Part 255 and one violation of 16 NYCRR Part 261 were noted.

16 NYCRR 255.603(d) – General Provisions – 1 Violation, 7 Occurrences

One violation of 255.603(d), which states that each operator shall satisfactorily conform with the program submitted.

The following are cited as examples where this requirement was not met:

1. Account #4006429183 - National Grid Glens Falls failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 7/1/22 and the meter was not locked. The service was subsequently cut at the curb box on 7/15/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#11)**
2. Account #6148823229 - National Grid Glens Falls failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18.

***** ATTACHMENT B *****

Records indicate that this service account was closed on 11/10/22 and the meter was not locked. A site-specific analysis was performed on 12/2/22 and the meter was subsequently locked on 12/14/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#12)**

3. Account #6316466285 - National Grid Glens Falls failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 7/29/22 and the meter was not locked. The service was subsequently transferred to a new customer on 8/15/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#13)**
4. Account #7603807500 - National Grid Glens Falls failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 6/1/22 and the meter was not locked. The meter was subsequently locked on 7/20/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#14)**
5. Account #8070223333 - National Grid Glens Falls failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 11/7/22 and the meter was not locked. The service was subsequently transferred to a new customer on 11/28/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#15)**
6. Account #9167621837 - National Grid Glens Falls failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 4/7/22 and the meter was not locked. The service was subsequently locked on 5/12/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#16)**
7. Account #9169036130 - National Grid Glens Falls failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 7/7/22 and the meter was not locked. The service was subsequently locked on 7/21/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#17)**

***** ATTACHMENT B *****

16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 7 Occurrences

One violation of 255.723(b)(3), which states, “If the operator employs leakage history to determine areas of active corrosion, the leakage survey frequency shall be at least once every 3 calendar years at intervals not exceeding 39 months on mains and service lines.”

The following are cited as examples where this requirement was not met:

1. Zone Map #191-958-05-03 – Records indicate that this pipe was surveyed on 8/29/17, and not again until 7/19/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#18)**
2. Zone Map #191-958-06-03 – Records indicate that this pipe was surveyed on 8/29/17, and not again until 7/19/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#19)**
3. Zone Map #191-958-06-04 – Records indicate that this pipe was surveyed on 8/29/17, and not again until 7/19/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#20)**
4. Zone Map #191-958-07-05 – Records indicate that this pipe was surveyed on 7/16/18, and not again until 10/17/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#21)**
5. Zone Map #192-957-02-06 – Records indicate that this pipe was surveyed on 10/22/18, and not again until 10/18/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#22)**
6. Zone Map #191-955-11-05 – Records indicate that this pipe was surveyed on 4/22/19, and not again until 10/18/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#23)**
7. Zone Map #191-956-11-06 – Records indicate that this pipe was surveyed on 4/23/19, and not again until 10/19/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#24)**

Note: The technical violations bulleted above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

***** ATTACHMENT B *****

16 NYCRR Part 261.17(a) – Leakage survey – 1 Violation, 2 Occurrences

One violation of 261.17(a), which states, “Whenever the operator performs a leakage survey, as required by section 255.706 or 255.723 of this Title, said survey is to include all known underground gas piping beyond the outlet of the customers' meter, excluding customer piping in industrial complexes.

The following are cited as examples where this requirement was not met:

1. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 4/23/19, and not again until 10/19/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey within a 39-month interval. (NRA – HR#25)
2. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 4/23/19, and not again until 10/19/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey within a 39-month interval. (NRA – HR#26)

Gloversville

Record Audits

Two violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

16 NYCRR 255.603(d) – General Provisions – 1 Violation, 1 Occurrence

One violation of 255.603(d), which states that each operator shall satisfactorily conform with the program submitted.

The following is cited as an example where this requirement was not met:

1. Account #3532542245 - National Grid Gloversville failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 4/15/22 and the meter was not locked. The service was subsequently transferred to a new customer on 5/11/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. (NRA – HR#27)

16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 4 Occurrences

One violation of 255.723(b)(3), which states, “If the operator employs leakage history to determine areas of active corrosion, the leakage survey frequency shall be at least once every 3 calendar years at intervals not exceeding 39 months on mains and service lines.”

The following are cited as examples where this requirement was not met:

***** ATTACHMENT B *****

1. Zone Map #184-968-05-05 – Records indicate that this pipe was surveyed on 6/2/17, and not again until 5/17/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#28)**
2. Zone Map #184-968-06-06 – Records indicate that this pipe was surveyed on 6/2/17, and not again until 5/18/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#29)**
3. Zone Map #184-968-08-06 – Records indicate that this pipe was surveyed on 6/2/17, and not again until 5/18/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#30)**
4. Zone Map #184-968-08-04 – Records indicate that this pipe was surveyed on 10/9/18, and not again until 5/19/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#31)**

Note: The technical violations bulleted above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

Mohawk Valley

Record Audits

Two violations of 16 NYCRR Part 255 and one violation of 16 NYCRR Part 261 were noted.

16 NYCRR Part 255.603(d) – General provisions – 1 Violation, 2 Occurrences

One violation of 255.603(d), which states that each operator shall satisfactorily conform to the program submitted.

The following are cited as examples where this requirement was not met:

1. Account #2432549161 - [REDACTED] – National Grid Mohawk Valley failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 4/11/22 and the meter was not locked. A site-specific analysis was conducted on 5/4/22. The meter was subsequently locked on 5/5/22. A new customer took over the account on 9/30/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#32)**
2. Account #5355168272 - [REDACTED] – National Grid Mohawk Valley failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 9/2/22 and the meter was not locked. A new customer took over the account on 9/14/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#33)**

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16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 10 Occurrences

One violation of 255.723(b)(3), which states, “If the operator employs leakage history to determine areas of active corrosion, the leakage survey frequency shall be at least once every 3 calendar years at intervals not exceeding 39 months on mains and service lines.”

The following are cited as examples where this requirement was not met:

1. Zone Map #174-964-01-06 – Records indicate that this pipe was surveyed on 6/5/2019, and not again until 9/28/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#34)**
2. Zone Map #174-964-05-12 – Records indicate that this pipe was surveyed on 6/12/2019, and not again until 9/28/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#35)**
3. Zone Map #174-964-06-12 – Records indicate that this pipe was surveyed on 6/12/2019, and not again until 9/28/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#36)**
4. Zone Map #170-963-05-10 – Records indicate that this pipe was surveyed on 4/30/19, and not again until 10/10/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#37)**
5. Zone Map #170-963-06-11 – Records indicate that this pipe was surveyed on 4/30/19, and not again until 10/10/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#38)**
6. Zone Map #165-960-08-04 – Records indicate that this pipe was surveyed on 8/31/17, and not again until 7/18/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#39)**
7. Zone Map #169-963-09-01 – Records indicate that this pipe was surveyed on 8/17/17, and not again until 7/14/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#40)**
8. Zone Map #170-963-02-05 – Records indicate that this pipe was surveyed on 8/11/17, and not again until 7/18/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#41)**

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9. Zone Map #167-963-07-04 – Records indicate that this pipe was surveyed on 4/22/19, and not again until 10/6/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#42)**
10. Zone Map #167-961-05-09 – Records indicate that this pipe was surveyed on 9/28/18, and not again until 10/12/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#43)**

Note: The technical violations listed above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR Part 261.17(a) – Leakage survey – 1 Violation, 2 Occurrences

One violation of 261.17(a), which states, “Whenever the operator performs a leakage survey, as required by section 255.706 or 255.723 of this Title, said survey is to include all known underground gas piping beyond the outlet of the customers' meter, excluding customer piping in industrial complexes.”

The following are cited as examples where this requirement was not met:

1. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/4/18, and not again until 10/6/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#44)**
2. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 6/6/19, and not again until 10/6/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#45)**

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Saratoga
Record Audits

Two violations of 16 NYCRR Part 255 and two violations of 16 NYCRR Part 261 were noted.

16 NYCRR 255.603(d) – General Provisions – 1 Violation, 5 Occurrences

One violation of 255.603(d), which states that each operator shall satisfactorily conform with the program submitted.

The following are cited as examples where this requirement was not met:

1. GFDR [REDACTED] - National Grid Saratoga failed to conform to Gas Work Method COR02020, Inspecting Exposed Steel Pipe for Corrosion, Revision 2, dated 6/15/20. Records indicate that a "Riser leak below the shut off" was identified at this address on 12/6/22. The Company "Renewed the 1" steel gas svc with 1/2" plastic". A GFDR was completed for the 1" steel gas service, but the Company did not complete a GFDR for the associated steel gas main. The Company failed to conduct and/or document an inspection of the steel gas main when it was exposed for the service renewal. **(NRA – HR#46)**
2. Account #2240131115 - National Grid Saratoga failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 9/2/22 and the meter was not locked. The meter was subsequently locked on 9/28/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#47)**
3. Account #4088816106 - National Grid Saratoga failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 8/12/22 and the meter was not locked. The service was subsequently transferred to a new customer on 9/16/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#48)**
4. Account #6325221114 - National Grid Saratoga failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 10/19/22 and the meter was not locked. The meter was subsequently locked on 11/18/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#49)**
5. Account #8950210178 - National Grid Saratoga failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 7/20/22 and the meter was not locked. The service was subsequently transferred to a new customer on 8/23/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#50)**

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16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 11 Occurrences

One violation of 255.723(b)(3), which states, “If the operator employs leakage history to determine areas of active corrosion, the leakage survey frequency shall be at least once every 3 calendar years at intervals not exceeding 39 months on mains and service lines.”

The following are cited as examples where this requirement was not met:

1. Zone Map #190-963-06-02 – Records indicate that this pipe was surveyed on 5/24/17, and not again until 5/5/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#51)**
2. Zone Map #190-963-06-03 – Records indicate that this pipe was surveyed on 5/24/17, and not again until 5/5/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#52)**
3. Zone Map #189-963-09-07 – Records indicate that this pipe was surveyed on 8/10/17, and not again until 5/10/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#53)**
4. Zone Map #190-963-02-09 – Records indicate that this pipe was surveyed on 8/29/17, and not again until 8/4/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#54)**
5. Zone Map #189-966-02-10 – Records indicate that this pipe was surveyed on 6/30/18, and not again until 9/8/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#55)**
6. Zone Map #189-963-12-01 – Records indicate that this pipe was surveyed on 6/21/19, and not again until 9/26/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#56)**
7. Zone Map #189-966-01-01 – Records indicate that this pipe was surveyed on 10/15/18, and not again until 10/11/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#57)**
8. Zone Map #188-965-11-05 – Records indicate that this pipe was surveyed on 10/22/18, and not again until 10/11/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#58)**
9. Zone Map #189-965-01-04 – Records indicate that this pipe was surveyed on 10/23/18, and not again until 10/13/22. Records also indicate that portions of this zone map are not plastic or

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cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#59)**

10. Zone Map #189-965-03-03 – Records indicate that this pipe was surveyed on 8/16/18, and not again until 10/14/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#60)**
11. Zone Map #190-962-04-12 – Records indicate that this pipe was surveyed on 5/22/19, and not again until 10/18/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39 month interval. **(NRA – HR#61)**

Note: The technical violations bulleted above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR Part 261.17(a) – Leakage survey – 1 Violation, 4 Occurrences

One violation of 261.17(a), which states, “Whenever the operator performs a leakage survey, as required by section 255.706 or 255.723 of this Title, said survey is to include all known underground gas piping beyond the outlet of the customers' meter, excluding customer piping in industrial complexes.

The following are cited as examples where this requirement was not met:

1. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 5/22/19, and not again until 10/18/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#62)**
2. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 5/22/19, and not again until 10/18/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#63)**
3. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 6/10/19, and not again until 10/14/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#64)**
4. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 5/24/17, and not again until 5/5/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#65)**

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16 NYCRR 261.57(a) – Warning Tag: Class A Condition – 1 Violation, 1 Occurrence

One violation of 261.57(a), which states, “A Class A condition presents an immediate hazard requiring the operator to shut off the gas and lock the meter, unless the operator can effectively isolate the affected area from the rest of the system.”

The following is cited as an example where this requirement was not met:

1. [REDACTED] (Salesforce #06307795) - Records indicate that this Class A warning tag was issued on 01/05/22 for a "Leak at Appliance". The Company record states that the action taken was "Appliance Shut Off at T Handle". The Company failed to shut off the gas and lock the meter or effectively isolate the affected area from the rest of the system. Note: it's understood that some leaks at appliances may be considered Class B conditions; however, in this case the representative chose to upgrade the warning tag to a Class A. Appropriate action should have been taken based on the classification assigned. **(NRA – HR#66)**

Schenectady

Record Audits

Two violations of 16 NYCRR Part 255 and one violation of 16 NYCRR Part 261 were noted.

16 NYCRR 255.603(d) – General Provisions – 1 Violation, 4 Occurrences

One violation of 255.603(d), which states that each operator shall satisfactorily conform with the program submitted.

The following are cited as an example where this requirement was not met:

1. Account #517665351 - National Grid Schenectady failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 6/8/22 and the meter was not locked. A site-specific analysis was not performed, and the meter was subsequently locked on 7/1/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#67)**
2. Account #7876458264 - National Grid Schenectady failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 5/28/22 and the meter was not locked. A site-specific analysis was not performed, and a new customer took over the account on 6/6/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#68)**
3. Account #8657667320 - National Grid Schenectady failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 5/23/22 and the meter was not locked. A site-specific analysis was not performed, and the meter was subsequently locked on 6/8/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#69)**
4. Account #914022156 - National Grid Schenectady failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18.

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Records indicate that this service account was closed on 7/12/22 and the meter was not locked. A site-specific analysis was performed on 9/22/22 and a new customer took over the account on 10/25/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#70)**

16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 8 Occurrences

One violation of 255.723(b)(3), which states, “If the operator employs leakage history to determine areas of active corrosion, the leakage survey frequency shall be at least once every 3 calendar years at intervals not exceeding 39 months on mains and service lines.”

The following are cited as examples where this requirement was not met:

1. Zone Map #187-972-02-12 – Records indicate that this pipe was surveyed on 8/8/17, and not again until 7/13/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#71)**
2. Zone Map #189-968-09-03 – Records indicate that this pipe was surveyed on 9/11/17, and not again until 8/22/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#72)**
3. Zone Map #189-968-10-02 – Records indicate that this pipe was surveyed on 9/11/17, and not again until 8/22/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#73)**
4. Zone Map #189-970-03-10 – Records indicate that this pipe was surveyed on 10/19/17, and not again until 8/31/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#74)**
5. Zone Map #188-968-07-07 – Records indicate that this pipe was surveyed on 9/27/17, and not again until 9/23/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#75)**
6. Zone Map #188-968-04-10 – Records indicate that this pipe was surveyed on 9/28/17, and not again until 9/27/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#76)**
7. Zone Map #188-972-11-10 – Records indicate that this pipe was surveyed on 10/3/18, and not again until 10/12/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#77)**
8. Zone Map #190-970-02-09 – Records indicate that this pipe was surveyed on 4/24/19, and not again until 10/17/22. Records also indicate that portions of this zone map are not plastic or

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cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#78)**

Note: The technical violations bulleted above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR Part 261.17(a) – Leakage survey – 1 Violation, 2 Occurrences

One violation of 261.17(a), which states, “Whenever the operator performs a leakage survey, as required by section 255.706 or 255.723 of this Title, said survey is to include all known underground gas piping beyond the outlet of the customers' meter, excluding customer piping in industrial complexes.

The following are cited as examples where this requirement was not met:

1. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 4/22/19, and not again until 10/17/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#79)**
2. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/3/18, and not again until 10/12/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#80)**

Syracuse
Record Audits

Two violations of 16 NYCRR Part 255 and one violation of 16 NYCRR Part 261 were noted.

16 NYCRR Part 255.603(d) – General provisions – 1 Violation, 7 Occurrences

One violation of 255.603(d), which states that each operator shall satisfactorily conform to the program submitted.

The following are cited as examples where this requirement was not met:

1. Account #1426104066 - [REDACTED] – National Grid Syracuse failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 8/19/22 and the meter was not locked. A site-specific analysis was conducted on 9/2/22 and then on 9/23/22. The meter was subsequently locked on 9/30/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#81)**
2. Account #2298857120 - [REDACTED] – National Grid Syracuse failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account

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was closed on 4/11/22 and the meter was not locked. A new customer took over the account on 5/1/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#82)**

3. Account #3490180332 - [REDACTED] – National Grid Syracuse failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 9/8/22 and the meter was not locked. The meter was subsequently locked on 9/15/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#83)**
4. Account #5335200224 - [REDACTED] – National Grid Syracuse failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 4/29/22 and the meter was not locked. The meter was subsequently locked on 5/14/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#84)**
5. Account #7572580349 - [REDACTED] – National Grid Syracuse failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 5/31/22 and the meter was not locked. A site-specific analysis was conducted on 6/29/22 and then on 7/7/22. A new customer took over the account on 7/7/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#85)**
6. Account #7903547130 - [REDACTED] – National Grid Syracuse failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 8/8/22 and the meter was not locked. A new customer took over the account on 9/12/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#86)**
7. Account #8519044367 - [REDACTED] – National Grid Syracuse failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 9/15/22 and the meter was not locked. A new customer took over the account on 9/27/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#87)**

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16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 9 Occurrences

One violation of 255.723(b)(3), which states, “If the operator employs leakage history to determine areas of active corrosion, the leakage survey frequency shall be at least once every 3 calendar years at intervals not exceeding 39 months on mains and service lines.”

The following are cited as examples where this requirement was not met:

1. Zone Map #154-963-08-12 – Records indicate that this pipe was surveyed on 5/31/17, and not again until 5/20/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#88)**
2. Zone Map #156-963-11-06 – Records indicate that this pipe was surveyed on 10/13/17, and not again until 8/16/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#89)**
3. Zone Map #154-965-03-06 – Records indicate that this pipe was surveyed on 8/9/18, and not again until 10/4/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#90)**
4. Zone Map #158-967-12-11 – Records indicate that this pipe was surveyed on 10/17/18, and not again until 10/10/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#91)**
5. Zone Map #153-958-10-03 – Records indicate that this pipe was surveyed on 10/5/18, and not again until 10/13/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#92)**
6. Zone Map #156-966-06-02 – Records indicate that this pipe was surveyed on 9/21/18, and not again until 10/14/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#93)**
7. Zone Map #155-966-12-10 – Records indicate that this pipe was surveyed on 8/24/18, and not again until 10/14/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#94)**
8. Zone Map #153-958-10-02 – Records indicate that this pipe was surveyed on 10/5/18, and not again until 10/14/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#95)**
9. Zone Map #154-965-05-07 – Records indicate that this pipe was surveyed on 8/9/18, and not again until 10/18/22. Records also indicate that portions of this zone map are not plastic or

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cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#96)**

Note: The technical violations bulleted above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR Part 261.17(a) – Leakage survey – 1 Violation, 9 Occurrences

One violation of 261.17(a), which states, “Whenever the operator performs a leakage survey, as required by section 255.706 or 255.723 of this Title, said survey is to include all known underground gas piping beyond the outlet of the customers' meter, excluding customer piping in industrial complexes.

The following are cited as examples where this requirement was not met:

1. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 4/29/19, and not again until 10/18/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#97)**
2. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 6/10/19, and not again until 10/18/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#98)**
3. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 6/12/19, and not again until 10/14/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#99)**
4. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 9/19/2018, and not again until 10/10/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#100)**
5. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 9/19/2018, and not again until 10/6/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#101)**
6. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 9/19/2018, and not again until 10/6/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#102)**

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7. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 5/30/19, and not again until 10/4/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#103)
8. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 6/18/19, and not again until 9/23/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#104)
9. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/16/17, and not again until 8/8/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#105)

Troy

Record Audits

Two violations of 16 NYCRR Part 255 and one violation of 16 NYCRR Part 261 were noted.

16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 9 Occurrences

One violation of 255.723(b)(3), which states, “If the operator employs leakage history to determine areas of active corrosion, the leakage survey frequency shall be at least once every 3 calendar years at intervals not exceeding 39 months on mains and service lines.”

The following are cited as examples where this requirement was not met:

1. Zone Map #191-973-09-12 – Records indicate that this pipe was surveyed on 9/18/17, and not again until 5/10/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. (NRA – HR#106)
2. Zone Map #191-973-07-08– Records indicate that this pipe was surveyed on 6/21/17, and not again until 5/26/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. (NRA – HR#107)
3. Zone Map #191-973-03-08 – Records indicate that this pipe was surveyed on 7/28/17, and not again until 6/23/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. (NRA – HR#108)
4. Zone Map #191-973-02-05 – Records indicate that this pipe was surveyed on 7/28/17, and not again until 6/24/22. Records also indicate that portions of this zone map are not plastic or

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cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#109)**

5. Zone Map #191-973-10-02 – Records indicate that this pipe was surveyed on 8/31/17, and not again until 8/16/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#110)**
6. Zone Map #191-974-09-08 – Records indicate that this pipe was surveyed on 9/28/18, and not again until 10/12/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#111)**
7. Zone Map #191-974-09-11 – Records indicate that this pipe was surveyed on 9/19/18, and not again until 10/13/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#112)**
8. Zone Map #191-974-07-10 – Records indicate that this pipe was surveyed on 6/3/19, and not again until 10/14/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#113)**
9. Zone Map #191-974-06-04 – Records indicate that this pipe was surveyed on 5/23/19, and not again until 10/17/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#114)**

Note: The technical violations bulleted above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR 255.815(d)(2) – Leaks: Type 2 Classification – 1 Violation, 1 Occurrence

One violation of 255.815(d)(2), which states, “Type 2 leaks include, but are not limited to: (2) any reading less than 20 percent gas-in-air in any unpaved area which is more than five feet (1.5 meters) from but within 20 feet (6.1 meters) of a building and inside the curblin e or shoulder of the road”

The following is cited as an example where this requirement was not met:

1. [REDACTED] (GRO #269294) – Records indicate that this Type 3 leak was reported on 2/27/17 with 10 LEL 17 feet from the building, consistent with Type 2 readings. The leak was placed under annual surveillance until 2021 when the main was replaced as part of a leak prone pipe replacement project, with consistent Type 2 readings at each surveillance. The Company failed to properly classify the leak as a Type 2. **(Removed from NRA)**

Note: The technical violation bulleted above may also be a violation of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

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16 NYCRR Part 261.17(a) – Leakage survey – 1 Violation, 2 Occurrences

One violation of 261.17(a), which states, “Whenever the operator performs a leakage survey, as required by section 255.706 or 255.723 of this Title, said survey is to include all known underground gas piping beyond the outlet of the customers' meter, excluding customer piping in industrial complexes.

The following are cited as examples where this requirement was not met:

1. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 6/3/19, and not again until 10/14/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#115)**
2. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 9/19/18, and not again until 10/13/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey within a 39-month interval. **(NRA – HR#116)**

Volney

Record Audits

Two violations of 16 NYCRR Part 255 and one violation of 16 NYCRR Part 261 were noted.

16 NYCRR Part 255.603(d) – General provisions – 1 Violation, 4 Occurrences

One violation of 255.603(d), which states that each operator shall satisfactorily conform to the program submitted.

The following are cited as examples where this requirement was not met:

1. Account #2931373145 - [REDACTED] – National Grid Volney failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 8/30/22 and the meter was not locked. A new customer took over the account on 9/19/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#117)**
2. Account #3741345356 - [REDACTED] – National Grid Volney failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 9/14/22 and the meter was not locked. The meter was subsequently locked on 9/30/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#118)**
3. Account #4084976110 - [REDACTED] – National Grid Volney failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled

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Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 8/13/22 and the meter was not locked. The meter was subsequently locked on 8/29/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#119)**

4. Account #5691372330 - [REDACTED] – National Grid Volney failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 9/1/22 and the meter was not locked. A site-specific analysis was conducted on 9/19/22. The meter was subsequently locked on 10/5/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. **(NRA – HR#120)**

16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 13 Occurrences

One violation of 255.723(b)(3), which states, “If the operator employs leakage history to determine areas of active corrosion, the leakage survey frequency shall be at least once every 3 calendar years at intervals not exceeding 39 months on mains and service lines.”

The following are cited as examples where this requirement was not met:

1. Zone Map #152-957-01-07 – Records indicate that this pipe was surveyed on 7/12/17, and not again until 6/10/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#121)**
2. Zone Map #152-957-01-08 – Records indicate that this pipe was surveyed on 7/12/17, and not again until 6/10/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#122)**
3. Zone Map #150-954-11-05 – Records indicate that this pipe was surveyed on 7/18/17, and not again until 6/29/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#123)**
4. Zone Map #151-956-07-09 – Records indicate that this pipe was surveyed on 7/17/17, and not again until 7/5/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#124)**
5. Zone Map #149-952-08-10 – Records indicate that this pipe was surveyed on 9/19/2017, and not again until 7/29/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#125)**
6. Zone Map #150-952-02-09 – Records indicate that this pipe was surveyed on 8/2/18, and not again until 9/23/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#126)**

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7. Zone Map #152-958-01-02 – Records indicate that this pipe was surveyed on 6/10/19, and not again until 10/18/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#127)
8. Zone Map #152-958-01-01 – Records indicate that this pipe was surveyed on 6/10/19, and not again until 10/18/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#128)
9. Zone Map #149-952-10-05 – Records indicate that this pipe was surveyed on 10/23/18, and not again until 10/21/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#129)
10. Zone Map #150-952-01-01 – Records indicate that this pipe was surveyed on 10/1/18, and not again until 10/24/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#130)
11. Zone Map #150-951-01-05 – Records indicate that this pipe was surveyed on 9/19/18, and not again until 10/24/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#131)
12. Zone Map #149-952-10-04 – Records indicate that this pipe was surveyed on 10/18/18, and not again until 10/24/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#132)
13. Zone Map #149-951-12-06 – Records indicate that this pipe was surveyed on 9/13/18, and not again until 10/25/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#133)

Note: The technical violations listed above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR Part 261.17(a) – Leakage survey – 1 Violation, 11 Occurrences

One violation of 261.17(a), which states, “Whenever the operator performs a leakage survey, as required by section 255.706 or 255.723 of this Title, said survey is to include all known underground gas piping beyond the outlet of the customers' meter, excluding customer piping in industrial complexes.

The following are cited as examples where this requirement was not met:

1. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 7/30/18, and not again until 10/25/22. Records also indicate that this pipe is

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located within a zone map that's scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#134)**

2. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/18/18, and not again until 10/24/22. Records also indicate that this pipe is located within a zone map that's scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#135)**
3. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/15/18, and not again until 10/24/22. Records also indicate that this pipe is located within a zone map that's scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#136)**
4. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/23/2018, and not again until 10/21/22. Records also indicate that this pipe is located within a zone map that's scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#137)**
5. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/15/2018, and not again until 10/24/22. Records also indicate that this pipe is located within a zone map that's scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#138)**
6. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/17/2018, and not again until 10/19/22. Records also indicate that this pipe is located within a zone map that's scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#139)**
7. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/17/2018, and not again until 10/19/22. Records also indicate that this pipe is located within a zone map that's scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#140)**
8. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/5/18, and not again until 10/13/22. Records also indicate that this pipe is located within a zone map that's scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#141)**
9. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/5/18, and not again until 10/14/22. Records also indicate that this pipe is located within a zone map that's scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. **(NRA – HR#142)**

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10. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/5/18, and not again until 10/14/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#143)
11. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 10/5/18, and not again until 10/14/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#144)

Watertown

Record Audits

Two violations of 16 NYCRR Part 255 and one violation of 16 NYCRR Part 261 were noted.

16 NYCRR Part 255.603(d) – General provisions – 1 Violation, 5 Occurrences

One violation of 255.603(d), which states that each operator shall satisfactorily conform to the program submitted.

The following are cited as examples where this requirement was not met:

1. Account #1521305118 - [REDACTED] – National Grid Watertown failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 8/25/22 and the meter was not locked. A site-specific analysis was conducted on 9/28/22. A new customer took over the account on 9/29/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. (NRA – HR#145)
2. Account #2764924596 - [REDACTED] – National Grid Watertown failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 4/15/22 and the meter was not locked. A site-specific analysis was conducted on 5/18/22 and 5/20/22. The meter was subsequently locked on 5/27/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. (NRA – HR#146)
3. Account #3336352225 - [REDACTED] – National Grid Watertown failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 9/30/22 and the meter was not locked. A new customer took over the account on 10/10/22. There was no record provided of a site-specific analysis being performed. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. (NRA – HR#147)
4. Account #5918785186 - [REDACTED] – National Grid Watertown failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and

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Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 5/20/22 and the meter was not locked. A site-specific analysis was conducted on 6/14/22. The meter was subsequently locked on 6/16/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. (NRA – HR#148)

5. Account #8229948250 - [REDACTED] – National Grid Watertown failed to conform to Gas Policy CMS05004, Securing Gas Services in Controlled and Uncontrolled Premises, Revision 2, dated 5/15/18. Records indicate that this service account was closed on 6/17/22 and the meter was not locked. A site-specific analysis was conducted on 6/27/22. A new customer took over the account on 7/15/22. The Company failed to conduct and/or document a site-specific analysis on Day 1 of the account termination process. (NRA – HR#149)

16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 12 Occurrences

One violation of 255.723(b)(3), which states, “If the operator employs leakage history to determine areas of active corrosion, the leakage survey frequency shall be at least once every 3 calendar years at intervals not exceeding 39 months on mains and service lines.”

The following are cited as examples where this requirement was not met:

1. Zone Map #159-935-06-11 – Records indicate that this pipe was surveyed on 6/26/17, and not again until 6/9/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#150)
2. Zone Map #155-943-11-04 – Records indicate that this pipe was surveyed on 9/7/17, and not again until 8/17/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#151)
3. Zone Map #155-943-12-05 – Records indicate that this pipe was surveyed on 9/7/17, and not again until 8/17/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#152)
4. Zone Map #159-935-09-09 – Records indicate that this pipe was surveyed on 10/5/17, and not again until 9/7/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#153)
5. Zone Map #159-935-09-07 – Records indicate that this pipe was surveyed on 10/5/17, and not again until 9/8/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#154)
6. Zone Map #159-933-12-06 – Records indicate that this pipe was surveyed on 5/8/19, and not again until 10/4/22. Records also indicate that portions of this zone map are not plastic or

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cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#155)

7. Zone Map #158-936-12-06 – Records indicate that this pipe was surveyed on 6/6/19, and not again until 10/17/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#156)
8. Zone Map #159-933-11-11 – Records indicate that this pipe was surveyed on 5/8/19, and not again until 10/18/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#157)
9. Zone Map #159-933-11-12 – Records indicate that this pipe was surveyed on 5/8/19, and not again until 10/19/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#158)
10. Zone Map #159-934-08-07 – Records indicate that this pipe was surveyed on 5/20/19, and not again until 10/20/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#159)
11. Zone Map #156-935-11-03 – Records indicate that this pipe was surveyed on 5/6/19, and not again until 10/20/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#160)
12. Zone Map #156-935-10-03 – Records indicate that this pipe was surveyed on 5/6/19, and not again until 10/21/22. Records also indicate that portions of this zone map are not plastic or cathodically protected steel. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#161)

Note: The technical violations listed above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR Part 261.17(a) – Leakage survey – 1 Violation, 2 Occurrences

One violation of 261.17(a), which states, “Whenever the operator performs a leakage survey, as required by section 255.706 or 255.723 of this Title, said survey is to include all known underground gas piping beyond the outlet of the customers' meter, excluding customer piping in industrial complexes.”

The following are cited as examples where this requirement was not met:

1. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 5/6/19, and not again until 10/20/22. Records also indicate that this pipe is located within a zone map that’s scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#162)

***** ATTACHMENT B *****

2. [REDACTED] – Records indicate that this piping beyond the meter was surveyed on 6/6/19, and not again until 10/12/22. Records also indicate that this pipe is located within a zone map that's scheduled for three-year leakage surveys. The Company failed to conduct and/or document a leakage survey at least once every 3 calendar years at intervals not exceeding 39 months. (NRA – HR#163)

***** ATTACHMENT B *****

**Attachment 2
Other Risk Violations
Violation Specifics**

Note: The use of the terms “violation(s)” and “occurrence(s)” in this attachment is for Pipeline and Hazardous Materials Safety Administration (PHMSA) reporting requirements. For the purpose of the Department of Public Service, “violation(s)” means “code section(s) violated” and “occurrence(s)” means “violation(s)” in this attachment.

**Albany
Record Audits**

Two violations of 16 NYCRR Part 255 and one violation of 16 NYCRR Part 261 were noted.

16 NYCRR 255.744(a) – Service Regulators and Vents: Inspection – 1 Violation, 1 Occurrence

One violation of 255.744(a), which states, “(a) Each operator shall inspect each service regulator when it is installed, at the time of periodic meter change, and at the time a service which has been inactive for a period of two years, or more is reactivated to service.” Additionally, “(d) The inspection of the service regulator shall include the following tests. (1) An outlet pressure test shall be taken under minimum load conditions. Minimum load condition, for purposes of this paragraph, shall mean no load or pilot load only. The pressure limits of this test shall be as established by this Part. (2) The operational pressure test shall be taken on the outlet side of the regulator with one or more appliances in operation. The acceptable limits of pressure shall be as established by this Part. (e) Each operator shall inspect each service regulator associated vent whenever the service regulator is inspected. This inspection shall include a test for the presence of gas, proper location of vent terminus, proper size, and proper installation of a weather-insect resistant fitting and verification by an inside the building inspection that the vent line piping is continuous and is properly connected to the regulator. Immediate remedial action shall be taken if any of these items do not pass inspection.”

The following is cited as an example where this requirement was not met:

1. SalesForce WO #06551161 – Maximo WO #2842768 – Records indicate that a periodic meter change was completed on 1/20/2022. No service regulator inspection was recorded at that time. The Company failed to conduct and/or document a service regulator inspection at the time of periodic meter change. **(NRA – OR#1)**

Note: The technical violation bulleted above may also be a violation of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

***** ATTACHMENT B *****

16 NYCRR 255.749(a) – Distribution Systems: Leakage Surveys and Procedures – 1 Violation, 2 Occurrences

One violation of 255.749(a), which states, “Each vault housing pressure-regulating and pressure-limiting equipment, and having a volumetric internal content of 200 cubic feet (5.66 cubic meters) or more, must be inspected at intervals not exceeding 15 months, but at least once each calendar year, to determine that it is in good physical condition and adequately ventilated.”

The following are cited as examples where this requirement was not met:

1. GRS 312 - Records indicate that this regulator station is located inside an underground vault and was inspected on 11/28/22 with a previous inspection date of 11/22/21. Records also indicate that at the time of the inspection the vault vent was not inspected for adequate ventilation. The Company failed to inspect and/or document the inspection of the vault vent line to ensure the vault was adequately vented each calendar year at interval not exceeding 15 months. **(NRA – OR#2)**
2. GRS 325 – Records indicate that this regulator station is located inside an underground vault and was inspected on 11/21/22 with a previous inspection date of 12/1/21. Records also indicate that at the time of the inspection the vault vent was not inspected for adequate ventilation. The Company failed to inspect and/or document the inspection of the vault vent line to ensure the vault was adequately vented each calendar year at interval not exceeding 15 months. **(NRA – OR#3)**

Note: The technical violations bulleted above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR 261.63(d)(1) – Warning Tag: Action and Follow-Up – 1 Violation, 1 Occurrence

One violation of 261.63(d)(1), which states, “Whenever a warning tag is issued, regardless of the class of the condition, the operator shall attempt to notify the customer and obtain a signature acknowledging receipt of such notice.

- (1) In apartment buildings, the operator shall notify the property owner or agent (such as superintendent, custodian or maintenance worker) of the condition and state the corrections that are required.”

The following is cited as an example where this requirement was not met:

1. SalesForce WO #07045167 – Records indicate that a Class A warning tag was issued on 5/2/22 and the landlord was not notified. The Company failed to notify and/or document notifying the property owner or agent when issuing a warning tag of any class in an apartment building. **(NRA – OR#4)**

***** ATTACHMENT B *****

Glens Falls

Record Audits

Two violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

16 NYCRR 255.744(a) – Service Regulators and Vents: Inspection – 1 Violation, 1 Occurrence

One violation of 255.744(a), which states, “(a) Each operator shall inspect each service regulator when it is installed, at the time of periodic meter change, and at the time a service which has been inactive for a period of two years, or more is reactivated to service.” Additionally, “(d) The inspection of the service regulator shall include the following tests. (1) An outlet pressure test shall be taken under minimum load conditions. Minimum load condition, for purposes of this paragraph, shall mean no load or pilot load only. The pressure limits of this test shall be as established by this Part. (2) The operational pressure test shall be taken on the outlet side of the regulator with one or more appliances in operation. The acceptable limits of pressure shall be as established by this Part. (e) Each operator shall inspect each service regulator associated vent whenever the service regulator is inspected. This inspection shall include a test for the presence of gas, proper location of vent terminus, proper size, and proper installation of a weather-insect resistant fitting and verification by an inside the building inspection that the vent line piping is continuous and is properly connected to the regulator. Immediate remedial action shall be taken if any of these items do not pass inspection.”

The following is cited as an example where this requirement was not met:

1. Salesforce #09475989 – Maximo #3815387 – Records indicate that a periodic meter change was completed on 7/14/2022. No service regulator inspection was recorded at that time. The Company failed to conduct and/or document a service regulator inspection at the time of periodic meter change. **(NRA – OR#5)**

Note: The technical violation bulleted above may also be a violation of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR 255.747(a) – Distribution line valves – annual – 1 Violation, 1 Occurrence

One violation of 255.747(a), which states, “Each valve, the use of which may be necessary for the safe shutdown or sectionalization of a distribution system, must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year. Included are the principal shut-off valves at district regulator stations and pressure limiting devices.”

The following is cited as an example where this requirement was not met:

1. Valve #100149 – Records indicate that this valve was initially inspected at installation on 10/19/20. The next inspection was completed on 5/27/21. Both the 10/19/20 and 5/27/21 inspections show “No” for valve operated. The valve was subsequently inspected on 5/22/22 and operated at that time. The Company failed to partially operate this valve at intervals not exceeding 15 months but at least once each calendar year between the time of its initial installation and the inspection completed on 5/22/22. **(Removed from NRA)**

Note: The technical violation bulleted above may also be a violation of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

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Gloversville

Record Audits

Two violations of 16 NYCRR Part 255 and two violations of 16 NYCRR Part 261 were noted.

16 NYCRR 255.744(a) – Service Regulators and Vents: Inspection – 1 Violation, 1 Occurrence

One violation of 255.744(a), which states, “(a) Each operator shall inspect each service regulator when it is installed, at the time of periodic meter change, and at the time a service which has been inactive for a period of two years, or more is reactivated to service.” Additionally, “(d) The inspection of the service regulator shall include the following tests. (1) An outlet pressure test shall be taken under minimum load conditions. Minimum load condition, for purposes of this paragraph, shall mean no load or pilot load only. The pressure limits of this test shall be as established by this Part. (2) The operational pressure test shall be taken on the outlet side of the regulator with one or more appliances in operation. The acceptable limits of pressure shall be as established by this Part. (e) Each operator shall inspect each service regulator associated vent whenever the service regulator is inspected. This inspection shall include a test for the presence of gas, proper location of vent terminus, proper size, and proper installation of a weather-insect resistant fitting and verification by an inside the building inspection that the vent line piping is continuous and is properly connected to the regulator. Immediate remedial action shall be taken if any of these items do not pass inspection.”

The following is cited as an example where this requirement was not met:

1. SalesForce WO #07206894 – Maximo WO #3028000 – Records indicate that a periodic meter change was completed on 3/11/2022. No service regulator inspection was recorded at that time. The Company failed to conduct and/or document a service regulator inspection at the time of periodic meter change. **(NRA – OR#6)**

Note: The technical violation bulleted above may also be a violation of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR 255.747(a) – Distribution line valves – annual – 1 Violation, 1 Occurrence

One violation of 255.747(a), which states, “Each valve, the use of which may be necessary for the safe shutdown or sectionalization of a distribution system, must be inspected and partially operated at intervals not exceeding 15 months, but at least once each calendar year. Included are the principal shut-off valves at district regulator stations and pressure limiting devices.”

The following is cited as an example where this requirement was not met:

1. Valve #100768 – Records indicate that this valve was initially inspected at installation on 12/21/21. The next inspection was completed on 8/10/22. Both the 12/21/21 and 8/10/22 inspections show “No” for valve operated. The valve was subsequently inspected on 2/10/23 and operated at that time. The Company failed to partially operate this valve at intervals not exceeding 15 months but at least once each calendar year between the time of its initial installation and the inspection completed on 2/10/23. **(Removed from NRA)**

Note: The technical violation bulleted above may also be a violation of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

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16 NYCRR 261.63(a)(1) – Warning Tag: Action and Follow-Up – 1 Violation, 1 Occurrence

One violation of 261.63(a)(1), which states, “(a) When a Class A condition is discovered, the operator shall lock off the gas supply at the meter, unless the affected piping or gas fired appliance can be effectively isolated and secured from the rest of the system, and issue a warning tag. (1) If the operator is not advised by the customer within 10 calendar days that the condition has been corrected and service is ready to be reinstated, the operator shall contact the customer no later than the end of the first business day after the 10-day period to determine the status of service.”

The following is cited as an example where this requirement was not met:

1. SalesForce WO #10026832 - Records indicate that a Class A warning tag was issued on 8/16/22 and that the customer did not advise the Company that the condition was corrected within 10 calendar days. The Company failed to contact the customer before the end of the first business day after the 10-day period. (NRA – OR#7)

16 NYCRR 261.63(d)(1) – Warning Tag: Action and Follow-Up – 1 Violation, 1 Occurrence

One violation of 261.63(d)(1), which states, “Whenever a warning tag is issued, regardless of the class of the condition, the operator shall attempt to notify the customer and obtain a signature acknowledging receipt of such notice.

- (1) In apartment buildings, the operator shall notify the property owner or agent (such as superintendent, custodian or maintenance worker) of the condition and state the corrections that are required.”

The following is cited as an example where this requirement was not met:

1. SalesForce WO #07921222 – Records indicate that a Class A warning tag was issued on 5/2/22 and the landlord was not notified. The Company failed to notify and/or document notifying the property owner or agent when issuing a warning tag of any class in an apartment building. (NRA – OR#8)

Mohawk Valley

Record Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Saratoga

Record Audits

Zero violations of 16 NYCRR Part 255 and zero violation of 16 NYCRR Part 261 were noted.

Schenectady

Record Audits

One violation of 16 NYCRR Part 255 and one violation of 16 NYCRR Part 261 were noted.

16 NYCRR 255.744(a) – Service Regulators and Vents: Inspection – 1 Violation, 1 Occurrence

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One violation of 255.744(a), which states, “(a) Each operator shall inspect each service regulator when it is installed, at the time of periodic meter change, and at the time a service which has been inactive for a period of two years, or more is reactivated to service.” Additionally, “(d) The inspection of the service regulator shall include the following tests. (1) An outlet pressure test shall be taken under minimum load conditions. Minimum load condition, for purposes of this paragraph, shall mean no load or pilot load only. The pressure limits of this test shall be as established by this Part. (2) The operational pressure test shall be taken on the outlet side of the regulator with one or more appliances in operation. The acceptable limits of pressure shall be as established by this Part. (e) Each operator shall inspect each service regulator associated vent whenever the service regulator is inspected. This inspection shall include a test for the presence of gas, proper location of vent terminus, proper size, and proper installation of a weather-insect resistant fitting and verification by an inside the building inspection that the vent line piping is continuous and is properly connected to the regulator. Immediate remedial action shall be taken if any of these items do not pass inspection.”

The following is cited as an example where this requirement was not met:

1. SalesForce WO #08336456 – Maximo WO #3357979 – Records indicate that a periodic meter change was completed on 5/17/2022. No service regulator inspection was recorded at that time. The Company failed to conduct and/or document a service regulator inspection at the time of periodic meter change. **(NRA – OR#9)**

Note: The technical violation bulleted above may also be a violation of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

16 NYCRR 261.63(a)(1) – Warning Tag: Action and Follow-Up – 1 Violation, 1 Occurrence

One violation of 261.63(a)(1), which states, “(a) When a Class A condition is discovered, the operator shall lock off the gas supply at the meter, unless the affected piping or gas fired appliance can be effectively isolated and secured from the rest of the system, and issue a warning tag. (1) If the operator is not advised by the customer within 10 calendar days that the condition has been corrected and service is ready to be reinstated, the operator shall contact the customer no later than the end of the first business day after the 10-day period to determine the status of service.”

The following is cited as an example where this requirement was not met:

1. SalesForce WO #06906840 - Records indicate that a Class A warning tag was issued on 2/14/22 and that the customer did not advise the Company that the condition was corrected within 10 calendar days. The Company failed to contact the customer before the end of the first business day after the 10-day period. **(NRA – OR#10)**

Syracuse

Record Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

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Troy

Record Audits

One violation of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

16 NYCRR 255.744(a) – Service Regulators and Vents: Inspection – 1 Violation, 5 Occurrences

One violation of 255.744(a), which states, “(a) Each operator shall inspect each service regulator when it is installed, at the time of periodic meter change, and at the time a service which has been inactive for a period of two years, or more is reactivated to service.” Additionally, “(d) The inspection of the service regulator shall include the following tests. (1) An outlet pressure test shall be taken under minimum load conditions. Minimum load condition, for purposes of this paragraph, shall mean no load or pilot load only. The pressure limits of this test shall be as established by this Part. (2) The operational pressure test shall be taken on the outlet side of the regulator with one or more appliances in operation. The acceptable limits of pressure shall be as established by this Part. (e) Each operator shall inspect each service regulator associated vent whenever the service regulator is inspected. This inspection shall include a test for the presence of gas, proper location of vent terminus, proper size, and proper installation of a weather-insect resistant fitting and verification by an inside the building inspection that the vent line piping is continuous and is properly connected to the regulator. Immediate remedial action shall be taken if any of these items do not pass inspection.”

The following are cited as examples where this requirement was not met:

1. SalesForce WO #10557559 – Maximo WO #4928908 – Records indicate that a periodic meter change was completed on 9/26/2022. No service regulator inspection was recorded at that time. The Company failed to conduct and/or document a service regulator inspection at the time of periodic meter change. **(NRA – OR#11)**
2. SalesForce WO #10836327 – Maximo WO #5088320 – Records indicate that a periodic meter change was completed on 10/4/2022. No service regulator inspection was recorded at that time. The Company failed to conduct and/or document a service regulator inspection at the time of periodic meter change. **(NRA – OR#12)**
3. SalesForce WO #09346975 – Maximo WO #3743209 – Records indicate that a periodic meter change was completed on 7/7/2022. No service regulator inspection was recorded at that time. The Company failed to conduct and/or document a service regulator inspection at the time of periodic meter change. **(NRA – OR#13)**
4. SalesForce WO #11763440 – Maximo WO #5659688 – Records indicate that a periodic meter change was completed on 12/13/2022. No service regulator inspection was recorded at that time. The Company failed to conduct and/or document a service regulator inspection at the time of periodic meter change. **(NRA – OR#14)**
5. SalesForce WO #11775716 – Maximo WO #5666282 – Records indicate that a periodic meter change was completed on 12/20/2022. No service regulator inspection was recorded at that time. The Company failed to conduct and/or document a service regulator inspection at the time of periodic meter change. **(NRA – OR#15)**

Note: The technical violations bulleted above may also be violations of 255.603(d) if the Company failed to follow its operating and maintenance plan. Independent procedure violations have not been written at this time but may be written in the future.

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Volney

Record Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Watertown

Record Audits

Zero violations of 16 NYCRR Part 255 and zero violations of 16 NYCRR Part 261 were noted.

Attachment 3 Areas of Concern

Note: Areas of concern are brought to National Grid’s attention rather than issue a finding of a noncompliance at this time. Staff’s expectation is that National Grid will address area of concerns with procedure changes. Staff considers areas of concern as equivalent to notices of amendments where if such amendments are not made to procedures, National Grid may be subject to findings of noncompliance in future audits, specifically under 16 NYCRR Part 255.603(b) for lacking a sufficient detailed written operating and maintenance plan for complying and 16 NYCRR Part 255.605(i) for failing to comply with any requirement under this Part that is written in nonspecific language.

1. **Pressure Record Review** - 255.741(e) states “Each chart removed from a recording pressure gauge shall be reviewed for indications of abnormally high or low pressure.” Additionally, section 5.4 of INR03001 states “Any irregularities in the recorded pressure readings shall be reviewed by a person qualified to interpret the readings.” With that said, during our review of the 2022 pressure records, Staff observed a few incorrectly scaled pressure charts that were placed on recording gauges and then subsequently removed with no acknowledgement of the incorrect scale. Following are the specifics.

Glens Falls

- [REDACTED] recording gauge - the April chart indicated that the outlet pressure was approximately 60 psig. The expected pressure is around 90 psig (99 psig MAOP). This discrepancy was due to an incorrectly scaled chart. No note was observed on the chart acknowledging or explaining the significant difference in pressure. The reviewer should’ve noticed the pressure difference during his/her review and either taken corrective action to address the pressure discrepancy or added a note explaining the incorrect scale.

Saratoga

- [REDACTED] recording gauge - the March and April charts indicated that the outlet pressure was approximately 7.5 iwc or 75 psig. The expected pressure is around 30 psig (MAOP). This discrepancy was due to an incorrectly scaled chart. No note was observed on the chart acknowledging or explaining the significant difference in pressure. The reviewer should’ve noticed the pressure difference during his/her review and either taken corrective action to address the pressure discrepancy or added a note explaining the incorrect scale.

2. **HEFPA liaison** – 261.53 states, “whenever the disconnection results in a customer being unable to use the heating facilities, the operator shall notify its Home Energy Fair Practices Act (HEFPA) liaison with local social services departments (section 11.5(c)(2)(v) of this Title).” Part 11.5(c)(3) requires same day notification if a suspected serious impairment exists, and Part 11.5(c)(2)(iii) defines serious impairment. During our audit, Staff found a number of instance where we couldn’t definitively determine if same day notification to local social services was required. This was partially due to your warning tag records lacking a designated field to depict whether or not a customer is likely to suffer a serious impairment when heating facilities are discontinued. Going forward Staff suggests that an additional field be added to the warning tag record to document the results of your serious impairment evaluation (e.g., Suspected Serious Impairment Y/N). Additionally, if heating facilities are discontinued and a suspected serious impairment is identified same day notification to the local social services is required.

Following are examples where Staff was unable to definitively determine if same day notification was required.

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Albany

- [REDACTED] (SalesForce #06338911) - A Class A warning tag was issued on 1/7/22 and resulted in the meter being locked off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 1/10/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] (SalesForce #11401592) - A Class A warning tag was issued on 11/11/22 and resulted in the meter being locked off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 11/14/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] (SalesForce #11478941) - A Class A warning tag was issued on 11/18/22 and resulted in the meter being locked off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 11/20/22, two days later. The Company should have notified the local social services department on the same day service was terminated.

Glens Falls

- [REDACTED] (Salesforce #06748673) - A Class A warning tag was issued on 1/29/22 and resulted in the boiler being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 1/31/22, two days later. The Company should have notified the local social services department on the same day service was terminated.

Gloversville

- [REDACTED] (Salesforce #07480148) - A Class A warning tag was issued on 4/2/22 and resulted in the meter being locked off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 4/4/22, two days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] (SalesForce #07007612) - A Class B warning tag was issued on 2/22/22 and resulted in the furnace being isolated during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 2/24/22, two days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] (SalesForce #07572829) - A Class B warning tag was issued on 4/8/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 4/11/22, three days later.

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The Company should have notified the local social services department on the same day service was terminated.

- [REDACTED] (SalesForce #07586304) - A Class C warning tag was issued on 4/9/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates "HEFPA Required: Yes". Records also indicate that there was a "Suspected Serious Impairment" and contact with social services was made on 4/11/22, two days later. The Company should have notified the local social services department on the same day service was terminated.

Mohawk Valley

- [REDACTED] - SFWO# 06346252 - A Class B warning tag was issued on 1/7/22 and resulted in the boiler being shut off during the heating season. The warning tag indicates "HEFPA Required: Yes". Records also indicate that there was "Suspected Serious Impairment" and contact with social services was made on 1/10/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 06817959 - A Class C warning tag was issued on 2/4/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates "HEFPA Required: Yes". Records also indicate that there was "Suspected Serious Impairment" and contact with social services was made on 2/7/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 11401501 - A Class A warning tag was issued on 11/11/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates "HEFPA Required: Yes". Records also indicate that there was "Suspected Serious Impairment" and contact with social services was made on 11/14/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 06923857 - A Class A warning tag was issued on 2/12/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates "HEFPA Required: Yes". Records also indicate that there was "Suspected Serious Impairment" and contact with social services was made on 2/14/22, two days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 11816841 - A Class A warning tag was issued on 12/16/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates "HEFPA Required: Yes". Records also indicate that there was "Suspected Serious Impairment" and contact with social services was made on 12/19/22, three days later. The Company should have notified the local social services department on the same day service was terminated.

Saratoga

- [REDACTED] (Salesforce #06361047) - A Class A warning tag was issued on 1/8/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates "HEFPA Required: Yes". Records also indicate that there was "Suspected Serious

***** ATTACHMENT B *****

Impairment” and contact with social services was made on 1/10/22, two days later. The Company should have notified the local social services department on the same day service was terminated.

- [REDACTED] (Salesforce #06747977) - A Class A warning tag was issued on 1/29/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 1/31/22, two days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] (Salesforce #07290935) - A Class A warning tag was issued on 3/19/22 and resulted in the boiler being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 3/21/22, two days later. The Company should have notified the local social services department on the same day service was terminated.

Schenectady

- [REDACTED] (SalesForce #06625841) - A Class B warning tag was issued on 1/22/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 1/24/22, two days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] (SalesForce #06757062) - A Class B warning tag was issued on 1/31/22 and resulted in the boiler being isolated during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 2/7/22, seven days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] (SalesForce #06919056) - A Class A warning tag was issued on 2/11/22 and resulted in the meter being locked off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 2/14/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] (SalesForce #11322110) - A Class A warning tag was issued on 11/4/22 and resulted in the meter being locked off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 11/7/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] (SalesForce #11400508) - A Class A warning tag was issued on 11/11/22 and resulted in the furnace being isolated during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious

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Impairment” and contact with social services was made on 11/14/22, three days later. The Company should have notified the local social services department on the same day service was terminated.

- [REDACTED] (SalesForce #11495990) - A Class A warning tag was issued on 11/18/22 and resulted in the furnace being isolated during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 11/20/22, two days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] (SalesForce #11498742) - A Class A warning tag was issued on 11/18/22 and resulted in the meter being locked off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 11/20/22, two days later. The Company should have notified the local social services department on the same day service was terminated.

Syracuse

- [REDACTED] - SFWO# 07068627 - A Class A warning tag was issued on 2/27/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 3/2/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 07418710 - A Class A warning tag was issued on 4/1/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 4/4/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 11596421 - A Class A warning tag was issued on 12/2/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 12/5/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 11881773 - A Class A warning tag was issued on 12/24/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 12/27/22, three days later. The Company should have notified the local social services department on the same day service was terminated.

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Troy

- [REDACTED] (SalesForce #07215088) - A Class A warning tag was issued on 03/12/22 and resulted in the boiler being isolated during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was a “Suspected Serious Impairment” and contact with social services was made on 03/14/22, two days later. The Company should have notified the local social services department on the same day service was terminated.

Volney

- [REDACTED] - SFWO# 06815358 - A Class A warning tag was issued on 2/4/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 2/7/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 11320525 - A Class A warning tag was issued on 11/4/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 11/7/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 11305614 - A Class C warning tag was issued on 11/10/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 11/14/22, four days later. The Company should have notified the local social services department on the same day service was terminated.

Watertown

- [REDACTED] - SFWO# 06345496 - A Class B warning tag was issued on 1/7/22 and resulted in the boiler being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 1/10/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 06911227 - A Class A warning tag was issued on 2/11/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 2/14/22, three days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 06913275 - A Class A warning tag was issued on 2/11/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates “HEFPA Required: Yes”. Records also indicate that there was “Suspected Serious Impairment” and contact with social services was made on 2/14/22, three days later. The

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Company should have notified the local social services department on the same day service was terminated.

- [REDACTED] - SFWO# 07378869 - A Class A warning tag was issued on 3/26/22 and resulted in the boiler being shut off during the heating season. The warning tag indicates "HEFPA Required: Yes". Records also indicate that there was "Suspected Serious Impairment" and contact with social services was made on 3/28/22, two days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 07380422 - A Class C warning tag was issued on 3/26/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates "HEFPA Required: Yes". Records also indicate that there was "Suspected Serious Impairment" and contact with social services was made on 3/28/22, two days later. The Company should have notified the local social services department on the same day service was terminated.
- [REDACTED] - SFWO# 11561551 - A Class A warning tag was issued on 11/26/22 and resulted in the furnace being shut off during the heating season. The warning tag indicates "HEFPA Required: Yes". Records also indicate that there was "Suspected Serious Impairment" and contact with social services was made on 11/28/22, two days later. The Company should have notified the local social services department on the same day service was terminated.