



Robert Massoni
Vice President
Gas Operations

Consolidated Edison Company
of New York, Inc.
4 Irving Place
New York, NY 10003-0987

October 23, 2026

VIA Electronic Notification

Hon. Michelle L. Phillips
Secretary to the Commission
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, New York 12223-1350

RE: Case 22-G-0065 Proceeding on Motion of the Commission as to the Rates,
Charges, Rules and Regulations of Consolidated Edison Company of New York,
Inc. for Gas Service

Dear Secretary Phillips:

Con Edison is submitting the following remediation plan in response to Staff's 2026
Records audit of Con Edison's 2025 Gas Operations and Maintenance Records.

The Company's 2022 Gas Rate Plan states:

[S]hould the operator address non-compliances of a single regulation in
excess of ten per audit type (field or record) per calendar year through a
remediation plan, the operator shall file the remediation plan within ninety
days of Staff's field or record audit letters in Case 22-G-0065 (Appendix
19 Attachment 1 of the Joint Proposal Approved by the Commission July
20, 2023).

The Audit report identified 97 alleged violations of 16 NYCRR 255.723(b)(1) and 28
alleged violations of 255.481(a).

The following remediation plan explains the actions the Company has already
implemented to reduce future compliance risk.

16 NYCRR Part 255.723(b)(1) and 255.481(a) Remediation Plan

The Company has implemented the following processes and controls in its remediation
plan for 16 NYCRR 255.723(b)(1) and 255.481(a):

On November 21, 2025, Con Edison submitted its remediation plan in response to
the 2025 Records Audit of Con Edison's 2024 Gas Operations and Maintenance
Records. Specifically, in its remediation plan, Con Edison stated:

The following remediation plan explains the actions the Company has already implemented to reduce future compliance risk.

16 NYCRR Part 255.723(b)(1) Remediation Plan

The Company has implemented the following processes and controls in its remediation plan for 16 NYCRR 255.723(b)(1):

1. The Company updated the communications plan to customers to make it a more streamlined process. Con Edison reduced the process to initiate the inspection until the point at which a customer may be inspected or terminated by up to 30 days.
2. The Company plans to initiate the inspection process of contacting customers and gaining access to buildings a minimum of 3 months earlier, when possible, to allow for additional time to gain access.
3. The Company created a new procedure, Service Shutdown Utilizing Service Line Valves G-11890. This specification dictates the process requirements for termination of no access service line inspections. Prior to this recent implementation, the terminations were not always performed prior to the inspection due date.

While the only code section cited for that plan was 255.723(b)(1), that remediation plan identified three process and control enhancements intended to address its entire service line inspection program, including 255.723(b)(2) and 255.481(a). Because those enhancements were not implemented until late 2025, they were not in effect for the vast majority of the period reviewed during the 2026 Records Audit of Con Edison's 2025 Gas Operations and Maintenance Records and therefore would not be expected to have a material impact on the audit results. With the implementation of these process and control enhancements, service line inspections performed beginning in 2026 will be subject to the revised requirements, oversight, and controls established through the prior remediation effort.

Therefore, the ten-violation cap should be applied to 16 NYCRR 255.723(b)(1) and 16 NYCRR 255.481(a) violations if Staff finds that the alleged violations are subject to a negative revenue adjustment.

Sincerely,

A handwritten signature in black ink that reads "Robert Massoni". The signature is written in a cursive, flowing style.

Robert Massoni