Introduction:

Based upon the Company's review of the documentation provided by Bridleside, the Company has verified to the best of its knowledge that the System (as defined in the Order) has been designed, constructed and maintained is in accordance with 16 NYCRR Part 255 and NYSEG standards or procedures, with exception of the items as noted herein.

Pipe Specifications:

Attached as Exhibit 1 to this Report is the document titled *Packing Lists for Materials Used.pdf* containing packing lists for the pipe and appurtenant fittings used to construct the Bridleside propane distribution system. The system was constructed with medium density polyethylene (MDPE) pipe and fittings. Based upon the available packing lists the following materials were used to construct the existing piping system:

- 1 inch IPS SDR 11 MDPE pipe, meeting ASTM D2513 specifications, and manufactured by Performance Pipe.
- 2 inch IPS SDR 11 MDPE butt fusion fittings, meeting ASTM D2513 specifications, and manufactured by Georg Fischer Central Plastics.
- 1 inch IPS SDR 11 MDPE ball valves, meeting ASTM D2513 specifications, and manufactured by PolyValve.
- 2 inch IPS SDR 11 MDPE ball valves, meeting ASTM D2513 specifications, and manufactured by PolyValve.
- 1 inch IPS SDR 11 MDPE anodeless risers manufactured by Georg Fischer Central Plastics.

Based upon the installation of SDR 11 MDPE pipe and fittings meeting the ASTM D2513 specification, NYSEG has determined that facilities are appropriate for distribution of natural gas.

NYSEG has been unable to confirm the SDR, specification, and manufacturer of the 2-inch MDPE coil pipe installed as listed on a packing list for the Company was unable to locate this material. Therefore, NYSEG intends to excavate at two locations to confirm the material used in the construction of the distribution system at locations within the piping system and will recover the excavation costs from Bridleside. The locations will include: the propane tank cut dead point, the tie in to NYSEG's proposed gas main on North Salem Road, and one (1) 2-inch butt fusion within the piping system.

Valves:

NYSEG is seeking a waiver with regard to valves used in the System. NYSEG has found that the existing valve boxes do not include support bases designed for use with plastic pipe in accordance with 16 NYCRR Part 255.193. The service line piping also does not include shut off valves in accordance with 16 NYCRR Part 255.363. To proceed with the conversion and to bring the System into conformance with the regulations and NYSEG standards, NYSEG intends to abandon all existing valves in place by removing the box lids and rims, then backfilling the boxes. Then the following new valves will be installed:

- A 2 inch sectionalizing valve at the connection to NYSEG's proposed gas main on North Salem Road.

- Outside service line valves at each building which will be served natural gas in accordance with IUSA Gas Construction Standard TM5.50.30 (General Gas Service Construction).

Procedures Used During Construction:

The Bridleside system was installed in a joint trench by Putnam Propane Gas with NYSEG electric distribution and other third party communications utilities. Attached as Exhibit 2 to this report is a document entitled *NYSEG Underground Dist Stds Section 3.pdf* which contains NYSEG's electric distribution standards describing the trench configuration. The propane piping was installed with a minimum of 30 inches depth of cover on the 2 inch mainline and 24 inches of cover on the laterals to each building. Criteria for padding around the facilities in the joint trench consisted of native soils with a maximum particle size of 0.5 inches, or sand with 100 percent of material passing through a 0.375 inch sieve where necessary. These installation parameters meet or exceed the requirements of 16 NYCRR Part 255 and NYSEG's standards.

In its investigation, the Company found that the operator qualifications as specified in 16 NYCRR Part 255.604 did not apply to propane installations. Therefore, NYSEG is requesting a waiver from the operator qualification requirements as specified in 16 NYCRR Part 255.604 for the installation of the pipe. Despite the Company's request for waiver, the Company intends to confirm the fitness of the pipe by:

- Confirm the pipe depth of cover, pipe bedding/padding, tracer wire locations, and visually inspect any plastic fusions found at the following locations where the existing piping will be exposed:

  - At the tie in point to the proposed NYSEG gas main on North Salem Road.
  - Where the existing propane tanks at Bridleside will be disconnected and 2 inch piping capped.
  - At each building where each service laterals will be exposed to complete installation of new risers, service line valves, and meter sets
  - At the location where existing 2-inch butt fusions are proposed to be excavated for testing.
- Verify that the tracer wire installation is complete by completing a walking patrol of all buried gas piping with an aboveground pipe locator.
- Complete a walking leak survey of all installed gas piping upon initial conversion to natural gas.

Plastic Fusion Qualifications:

Two employees of Putnam Propane Gas completed plastic fusions during the installation of the existing Bridleside propane distribution system. The individuals were qualified in plastic butt fusion joining by Various Technology LLC of Liverpool, New York as shown in Exhibit 3 attached. (*Fusion Certificates Putnam Propane.pdf*) Qualification was conducted in accordance with the *Performance Pipe Heat Fusion Joining Procedures and Qualification Guide* (attached as Exhibit 4 and titled *Performance Pipe Heat Fusion Joining Procedures and Qualification Guide.pdf*), 49 CFR Part 192.285 (which is equivalent to 16 NYCRR Part 255.285), and Plastic Pipe institute recommendations. The Various Technology LLC qualification process involves the completion of destructive testing for each fusion created, however, documentation for each destructive test completed is not available.

Therefore NYSEG is seeking a waiver from the Order to provide documentation of the destructive testing results since such documentation was not available. NYSEG proposes to excavate, visually examine, cut out and destructively test butt fusion joints in accordance with NYSEG/RG&E O&M Procedure 3.250 (Plastic Pipe Joining Qualifications). Sample butt fusion joints will be obtained at 2 inch diameter inline tees.

Pressure Testing:

Exhibit 5 attached and titled *Town of North Salem Permit Inspections.pdf* is a summary of building code inspections completed by the Town of North Salem related to the propane distribution. The inspection records note that pressure testing was completed on segments of the 2 inch buried at a test pressure of 90 psig. No records are available to document the pressure testing of the 1 inch piping.

NYSEG is requesting a waiver related to pressure testing of the original piping installation. NYSEG will pressure test the Bridleside main and services at 90 psig for a minimum of 1 hour after pressure stabilization in accordance with NYSEG/RG&E O&M Procedure 5.150 (Transmission and Distribution Pipeline Pressure Test Requirements) prior to converting the piping to natural gas distribution.

Surveillance and Inspection:

The Bridleside system has been in operation for approximately 1.5 years and has not been leak surveyed. NYSEG will leak survey the Bridleside piping system during the conversion to natural gas. NYSEG will perform this leak survey in accordance with NYSEG/RG&E O&M Procedure 7.150 (Leak Surveys).

As Built Drawings:

Attached as Exhibit 6 and titled *Bridleside Site Utility Plan.pdf* is the site utility as built plan describing the location of the propane distribution facilities which NYSEG proposes to convert to natural gas. NYSEG will confirm the location of all buried system gas piping prior to the conversion to natural gas in accordance with NYSEG/RG&E O&M Procedure 8.150 (Locating Underground Gas Facilities). NYSEG will incorporate the confirmed facility locations within company records systems in accordance with NYSEG/RG&E O&M Procedure 8.650 (Map and Record Maintenance).

Conclusion:

In summary, the Company respectfully requests that the Commission 1) grant the waivers requested herein, 2) accept the proposals contained herein, and 3) approve the conversion of the propane distribution system to natural gas.