STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service Commission held in the City of Albany on January 8, 2015

COMMISSIONERS PRESENT:

Audrey Zibelman, Chair
Patricia L. Acampora
Garry A. Brown
Gregg C. Sayre
Diane X. Burman

CASE 04-M-0159 – Proceeding on Motion of the Commission to Examine the Safety of Electric Transmission and Distribution Systems.

ORDER GRANTING IN PART PETITION TO MODIFY ELECTRIC SAFETY STANDARDS

(Issued and Effective January 13, 2015)

BY THE COMMISSION:

INTRODUCTION

The Commission's Electric Safety Standards have been in place since January 2005 and were revised in 2005, 2008 and 2013.[1] In a joint petition dated August 20, 2014, Central Hudson Gas & Electric Corporation (CHGE), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation d/b/a National Grid

[1] Case 04-M-0159, Proceeding on Motion of the Commission to Examine the Safety of Electric Transmission and Distribution Systems, Order Instituting Safety Standards (issued January 5, 2005)(January 2005 Order); Case 04-M-0159, supra, Order on Petitions for Rehearing and Waiver (issued July 21, 2005); Case 04-M-0159, supra, Order Adopting Changes to Electric Safety Standards (issued December 15, 2008)(2008 Order); Case 04-M-0159, supra, Order Granting Petition in Part and Modifying Electric Safety Standards (issued March 22, 2013) (2013 Order).

(National Grid), Orange and Rockland Utilities, Inc. (ORU), and Rochester Gas and Electric Corporation (RGE) (collectively, Petitioners) requested that the Commission modify the Electric Safety Standards (Standards). In the filing, Petitioners proposed revisions to the Standards that would alter the reporting requirements detailed in Appendix A. Specifically, the Petitioners proposed that the Commission: 1) streamline the reporting categories contained in the Summary of Shock Reports from the Public (Attachment 2); 2) streamline the category levels in the deficiency and repair data contained in the Summary of Deficiencies and Repair Activity Resulting from the Inspection Process (Attachment 3); 3) require reporting of deficiency and repair data on a five year rolling basis for the most recent period, along with data for incomplete repairs in other years (Attachment 3); and, 4) eliminate the reporting of Level IV deficiencies.

Pursuant to State Administrative Procedure Act (SAPA), §202(1) notice of the petition was published in the State Register on October 29, 2014. The comment period expired on December 15, 2014. No comments were received.

BACKGROUND

By Order issued January 5, 2005, the Commission adopted a set of Electric Safety Standards that established proactive steps for the electric utilities to take to protect the public from stray voltage and to enhance the reliability of the electric distribution systems in the state. The Standards include: (1) annual stray voltage testing of electric facilities accessible to the public using qualified voltage detection devices; (2) inspections of utility electric facilities on a minimum of a five-year cycle; (3) recordkeeping, certification, quality assurance and reporting requirements; and, (4) adoption of the National Electric Safety Code as the minimum standard governing utility construction, maintenance, and operations. The Standards also require that when a utility finds stray voltage, it must immediately make the facility safe and must complete repairs within 45 days. In order to ensure compliance with the Standards, a performance mechanism was introduced that imposes on each investor-owned utility a potential

negative revenue adjustment of 75 basis points each for failure to complete required testing and inspection targets on an annual basis.

In the July 2005 Order, certain aspects of the Electric Safety Standards were modified in response to a joint petition for rehearing from Central Hudson, NYSEG, National Grid, and RGE, and individual petitions from NYSEG, RGE, and ORU. The July 2005 Order extended the initial date for testing of overhead distribution and transmission facilities, including substations, for electric utilities other than Con Edison. Additionally, the requirements for certification of the test results by a company officer were clarified and the need for interior inspections of fiberglass hand holes was eliminated. In the December 2008 Order, the Commission approved several substantive revisions to the Standards. For stray voltage testing, these included adoption of a lower stray voltage testing threshold, improved reporting protocols, and a mandate to perform mobile testing in all cities with populations of 50,000 or greater. For inspections, defined repair categories were adopted along with enhanced reporting requirements with a requirement to better track and eliminate temporary repairs. The most recent modifications to the Standards were made in a March 2013 Order. The Commission made substantive revisions to the Standards, including the modification of the testing cycle for stray voltage for certain facilities from one to five years and the exemption of internal inspection for pad-mounted transformers in underground residential distribution systems.

DISCUSSION AND CONCLUSION

The following sections describe the proposals contained in the joint petition. Each section addresses the proposals and provides a discussion including the final recommendations. No substantive revisions to the testing or inspection requirements were proposed by the Petitioners. The Petitioners only propose changes to the reporting requirements contained in Appendix A of the Standards. The Appendices contain the version of the Standards that reflects the modifications discussed herein.

Summary of Shock Reports from the Public

Petitioners propose that Appendix A, Attachment 2 be modified to streamline the subcategories contained in the "Voltage Source" column from a total of 17 to five. Specifically Petitioners propose that the 12 equipment subcategories of the "Utility Responsibility" category should be consolidated into three subcategories: "Overhead Distribution System", "Underground Distribution System" and "Transmission System". Petitioners also state that the two subcategories of the "Customer Responsibility" category should be eliminated and the three subcategories of the "Other Utility/Gov't Agency Responsibility" category be consolidated into two subcategories "Streetlight" and "Other (Total)".

Discussion

The subcategories in Attachment 2 have been employed since the revisions to the Standards directed in the 2008 Order. The subcategories were established to capture as much detail as possible regarding the root causes of stray voltage reports and to standardize the reporting format for all utilities. In reviewing historic filings from the utilities, it is clear that many of these subcategories are rarely, if ever, populated. At this juncture, it is apparent that the granularity of the data currently required to be reported is unnecessary for the annual report and that the existing format can be simplified. Therefore, Petitioners will no longer be required to report this data in the manner currently required. It should be noted that the utilities will continue to identify, report and record substantiated sources of stray voltage and this information will be available to Staff for examination at any time. In addition, the Petitioners provide quarterly reports to Staff on an informal basis with detailed information on all shock reports.

Summary of Deficiencies and Repair Activity Resulting from the Inspection Process

Petitioners request that Appendix A, Attachment 3 be modified to eliminate data reporting at the structure subcategory level. The Summary of Deficiencies and Repair Activity Resulting from the Inspection Process report currently requires reporting in the following five structure categories, each of which includes a number of subcategories: Distribution Overhead Facilities with 15 subcategories plus category

totals; Transmission Facilities with ten subcategories plus category totals; Underground Facilities with nine subcategories plus category totals; Pad Mount Transformers Facilities with seven subcategories plus category totals; and, Streetlights Facilities with five subcategories plus category totals. For each subcategory plus the category total, five years of data must be provided separately showing Level I, Level II, and Level III deficiencies and repair data in the following sub-subcategories: Number of deficiencies; Repaired in Time Frame; Repaired – Overdue; Not Repaired – Not Due; and, Not Repaired – Overdue. In addition, the Summary of Deficiencies and Repair Activity Resulting from the Inspection Process currently requires separate data reporting for Level IV deficiencies and repairs totaling another 510 data points for completion.

The Petitioners propose to streamline the reporting of deficiency and repair data by reporting at the structure category level only, and not by structure subcategory. The Petitioners' proposal would eliminate reporting by 45 structure subcategories and would reduce reporting from 3,825 data points to 315 data points. The annual report would provide five years of structure category totals by year for the following repair information: "Repaired in Time Frame," "Repaired – Overdue," "Not Repaired – Not Due," and "Not Repaired – Overdue."

Discussion

Similar to the discussion above regarding Summary of Shock Reports from the Public, many of the subcategories have little or no recorded data on a regular basis. For the purposes of an annual summary report, the Petitioners proposal to streamline the data provided is reasonable. Thus, the proposed modification is granted.

Reporting Five Year Data on a Rolling Basis

Appendix A, Attachment 3 of the current version of the Standards prescribes a five year reporting period, commencing in 2009 and ending 2013, coinciding with the five year cycle mandated by the standards. In the next annual report, Petitioners will be reporting on performance for calendar year 2014, which necessitates a revision of this attachment. Petitioners request that the current five year period in the attachment be altered to allow for the flexibility necessary to allow for reporting on a five year rolling

basis, i.e., the 2014 edition of the annual report will include the 2010-2014 time frame. Petitioners also request clarification that the ongoing annual reporting of completed repairs is unnecessary, and that a footnote confirming all repairs have been completed for that year will suffice.

Discussion

Appendix A, Attachment 3 of the Standards currently in effect provide for a reporting period for the years 2009-2013, with no option to continue reporting beyond that prescribed time frame. The Petitioners are correct that the Standards must be revised to provide for reporting on a five-year rolling basis as proposed. Therefore, the modification proposed by the Petitioners is granted. With respect to the request for clarification, historically the Petitioners have included totals for completed repairs in previous years on an ongoing basis, repeating the same information in successive reports. This repetitive reporting of historical data is superfluous and unnecessary and the request for clarification is granted.

Reporting of Level IV Conditions

As described by the Safety Standards, Level IV conditions represent "Condition[s] found but repairs not needed at this time. Level IV is used to track atypical conditions that do not require repair within a five-year timeframe. This level should be used for future monitoring purposes and planning proactive maintenance activities." Level IV conditions are minor conditions such as missing guy guards, missing pole tags, incorrect transformer serial numbers, and damaged ground moldings. Petitioners propose that reporting of these conditions be eliminated as they do not adversely affect the safe and reliable operation of the utilities' electric systems and are generally captured for information purposes only.

Discussion

Petitioners are correct in noting that Level IV conditions do not require repair in a prescribed time frame. Typically utilities will take advantage of that designation to catalog and compile data on system conditions for future use in planning potential infrastructure replacement programs, but this effort is unrelated to proactive

repairs triggered by system defects. However, we see no compelling reason to eliminate the reporting of these conditions, and including this information in the annual report will provide a comprehensive picture of the overall results of the facility inspection program. As a result, we will not grant this request

Appendix B, Event Notification Requirements

Appendix B provides information to the utilities to determine when notification of certain system events should be provided to Staff. Appendix B has not been revised since the Standards were established in the January 2005 Order. Since 2005, new technology has resulted in improvements to the manner and speed in which Staff receives such notices. Foremost among these improvements is the Electric Incident Reporting System (EIRS), which allows utilities to report incidents to Staff via an e-mail system associated with the Department's in-house system. This has greatly improved the efficiency of reporting and distribution to Staff of event notifications. Staff included on distribution for a given event category receives the notice at their office location, and can also access the information from their mobile devices. In order to harmonize Appendix B with the current reporting protocols in the EIRS we are revising Appendix B to incorporate a reference to those reporting protocols. The utilities are cautioned, however, that they must continue to comply with 16 NYCRR Part 125 and any other applicable requirements.

The Commission orders:

1. As discussed in the body of this Order and included in Appendix A and B, the proposed revisions to the Safety Standards discussed are adopted in part.

2. The Secretary at her sole discretion may extend the deadlines set forth in this Order, provided the request for such extension is in writing, including a justification for the extension, and filed on a timely basis, which should be on at least one day's notice prior to any affected deadline.

3. This proceeding is continued.

By the Commission,

(SIGNED) KATHLEEN H. BURGESS
Secretary

ELECTRIC SAFETY STANDARDS

SECTION 1: DEFINITIONS

(a) Utilities – The term "utilities" includes all investor-owned and municipal electric corporations subject to the Commission's jurisdiction that own or operate transmission or distribution facilities, whether fully or lightly regulated. As appropriate, the term also includes companies subject to our jurisdiction that own or operate electric generating facilities within the State, whether fully or lightly regulated.

(b) Electric facilities – The term “electric facilities” means and refers to all electric plant, as that term is defined in Public Service Law §2(12), that is used to modulate, transmit, and/or distribute electricity, or is related to its modulation, transmission, and/or distribution. The term “overhead facilities” generally includes the electric facilities that are part of a utility’s overhead distribution system (e.g., the system that serves rural areas and includes towers, poles, and aerial cable and conductors). The term “underground facilities” generally includes the electric facilities that are part of a utility’s underground distribution system (e.g., the system that serves urban areas and includes manholes, service boxes, and underground cable and conductors).

(c) Stray Voltage –The term “stray voltage” means voltage conditions on electric facilities that should not ordinarily exist. These conditions may be due to one or more factors, including, but not limited to, damaged cables, deteriorated, frayed or missing insulation, improper maintenance, or improper installation.

(d) Streetlights – The term “streetlights” means and includes utility- and municipal owned streetlights located on, along, or adjacent to public thoroughfares and areas and traffic signal poles and devices; it does not include privately-owned light fixtures, such as those located in private parking lots.

(e) Stray Voltage Testing – The process of checking an electric facility for stray voltage using a device capable of reliably detecting and audibly and/or visually signaling voltage in the range of 6 to 600 volts.

(f) Findings – Any confirmed voltage reading on an electric facility or streetlight greater than or equal to 1V measured using a volt meter and a 500 ohm shunt resistor.

(g) Mitigation –Corrective actions performed by the utility to address the stray voltage findings.

(h) Inspection – A careful and critical examination of an electric facility by a qualified individual to determine the condition of the facility and the potential for it to cause or lead to safety hazards or adverse effects on reliability.

SECTION 2: NATIONAL ELECTRIC SAFETY CODE COMPLIANCE

(a) The installation, construction, maintenance, and operation of electric facilities shall comply with the latest version of the National Electric Safety Code (NESC), except where a utility's practices, procedures, and protocols are more stringent.

(b) Utilities are not required to retrofit their existing facilities to comply with the latest version of the NESC, unless the latest version of the NESC requires a retrofit.

(c) To the extent that projects currently being constructed do not comply with the NESC or a utility's more stringent standards, exemption from compliance will be considered on a case-by-case basis.

(d) If a utility believes that it cannot satisfy any provision of the NESC for a valid technical reason, it may petition the Commission for an exemption from compliance with that provision.

SECTION 3: STRAY VOLTAGE TESTING

(a) Stray voltage testing shall be conducted on all utility facilities that are capable of conducting electricity and are publicly accessible. Testing is not required on customer meters and customer-owned facilities, except municipal-owned streetlights.

(b) Stray voltage testing shall be conducted on all streetlights on an annual basis.

(c) For underground electric facilities that are publicly accessible, including, but not limited to, manholes, service boxes, and transformer vaults, stray voltage testing shall be conducted on the exposed surfaces of the facilities. Handholes that are constructed of fiberglass or other non-conductive materials need not be tested.

(d) Stray voltage testing of streetlights shall be conducted when the light is activated (i.e., at night).

(e) Stray voltage testing shall be conducted on an annual basis for all underground electric facilities that are publicly accessible, including, but not limited to, manholes, service boxes and transformer vaults. Testing shall be conducted on overhead distribution facilities, underground residential distribution facilities, overhead and underground transmission facilities, and substation fences at least once every five years. This testing may be conducted concurrently with the facility inspection required in Section 4 of these standards.

(f) If a streetlight to which a utility provides service is owned by another entity, and that entity conducts stray voltage testing meeting these safety standards, the utility may substitute that testing program for its own, provided the utility can certify the other entity's results.

(g) All equipment used for stray voltage testing must be certified by an independent test laboratory as being able to reliably detect voltages of 6 to 600 volts.

(h) Any facility for which a voltage finding is discovered shall be guarded by the utility immediately and continuously until the utility has performed mitigation and made the area safe. Mitigation shall be completed on any stray voltage findings.

(i) In instances where a stray voltage finding is determined to be caused by customer-owned equipment, the area must be immediately made safe. The utility shall immediately notify the customer or a responsible person associated with the premises or the customer-owned facility of the unsafe condition and the need for the customer to arrange for a permanent repair to the customer's equipment.

(j) In the event of a finding on an electric facility or streetlight during stray voltage testing, the utility shall test for stray voltage on all publicly accessible structures and sidewalks within a minimum 30 foot radius of the electric facility or streetlight.

(k) In each instance where stray voltage is determined to be caused by a utility-owned facility, best efforts shall be used to effect a permanent repair of the facility as soon as possible, but not later than 45 days after discovery of the stray voltage condition. A temporary repair to the facility may remain in place for more than 45 days only in extraordinary circumstances, and in such event the utility shall periodically perform site visits the monitor the condition of the temporary repair. All exceptions must be identified and justified as part of the reporting requirements under Section 9.

SECTION 4: INSPECTIONS

(a) Inspections shall include, at a minimum, visual examination of towers, poles, guy wires, risers, overhead cables and conductors, transformers, breakers, switches, and other aboveground equipment and facilities, and of the interior of manholes, service boxes, vaults, and other underground structures. Where debris or water is found in an underground structure, it must be removed before commencing the inspection so that all of the facilities in the structure, and the structure itself, may be fully inspected. Fiberglass handholes and pad-mounted transformers used in underground residential distribution systems are exempt from the interior inspection requirement.

(b) Inspection of equipment should be performed in a manner that allows the inspector to examine its components, except those that are ordinarily encased in sealed compartments. Utilities need not perform destructive testing as part of this inspection program, except as otherwise required by their more intensive inspection procedures.

(c) When a visual inspection indicates the need for a more intensive examination, the utilities shall perform infrared testing and/or other inspection procedures.

(d) When an inspection reveals a hazardous condition or other problem, whether related to stray voltage or otherwise, the utility must make all repairs necessary to eliminate the condition.

(e) All electric facilities shall be inspected at least once every five years. Certain facilities may warrant shorter inspection cycles.

(f) Each utility shall develop and implement a formal inspection program that complies with these safety standards.

(g) Inspections conducted during routine maintenance and other work not directly related to the inspection program may count as an inspection visit, provided that the inspection is performed using the same safety and reliability criteria and to the same extent as would otherwise be required under these standards. Inspections occurring during these field visits must be properly documented and certified.

(h) This inspection requirement is intended to complement, not supplant, the inspections any utility already performs; to the extent a utility's inspection program is broader or more intensive than the program described herein, the utility should continue to follow its own program.

(i) The testing and inspection programs may be combined, where practical and feasible, provided the synergy satisfies all the requirements contained within these safety standards.

(j) As part of the inspection process, deficiencies identified shall be categorized by the time period for the repair based on the severity of the condition. When prioritizing deficiencies, utilities should carefully account for the safety and operational effects should the facility fail prior to repair. Utilities will prioritize deficiencies by three categories:

> Level I – repair as soon a possible but not longer than one week. A Level I deficiency is an actual or imminent safety hazard to the public or poses a serious and immediate threat to the delivery of power. Critical safety hazards present at the time of the inspection shall be guarded until the hazard is mitigated.
>
> Level II – repair within one year. A Level II deficiency is likely to fail prior to the next inspection cycle and represent a threat to safety and/or reliability should a failure occur prior to repair.
>
> Level III – repair within three years. A Level III deficiency does not present immediate safety or operational concerns and would likely have minimum impact on the safe and reliable delivery of power if it does fail prior to repair.
>
> Level IV – condition found but repairs not needed at this time. Level IV is used to track atypical conditions that do not require repair within a five year timeframe. This level should be used for future monitoring purposes and planning proactive maintenance activities.

(k) Utilities are expected to permanently repair deficiencies identified by the inspection program within the priority time period established for its classification. All repair time periods are based on the initial date of discovery.

(l) When a temporary repair is located during an inspection or made by the company, best efforts shall be used to affect a permanent repair of the facility within 90 days. A temporary repair to the facility may remain in place for more than 90 days only in extraordinary circumstances, which may include major storms that require significant repair activity. In such event, the utility shall periodically perform site visits to monitor the condition of the temporary repair. All exceptions must be identified and justified as part of the reporting requirements under Section 9.

SECTION 5: QUALITY ASSURANCE

Each utility shall develop a quality assurance program to ensure timely and proper compliance with these safety standards. The quality assurance program shall be independent of the stray voltage testing and visual inspection programs. The management and personnel performing quality assurance activities shall be separate from those performing the required stray voltage testing and inspections.

(a) With regard to inspections, the quality assurance program should ensure that inspections are being performed on all facilities and that deficiencies are being properly identified and categorized for repair. The program should also verify that permanent repairs are made and the timeliness of the repairs.

SECTION 6: RECORDKEEPING

(a) Each utility shall develop procedures and protocols to track the stray voltage testing dates and results for each electric facility.

(b) Each utility shall develop procedures and protocols to track the inspection dates and results for each electric facility.

(c) Each utility shall develop procedures and protocols to track the permanent repairs made based on inspection data and whether the repairs were made in the appropriate timeframe. An inventory of outstanding repairs by priority level should also be maintained.

(d) Each utility shall develop procedures and protocols to track temporary repairs made on the system and whether these locations were permanently repaired within 90 days after making or locating a temporary repair.

(e) These records shall be kept in a manner that is readily accessible and searchable, continuously updated, and subject to review and audit by Staff and the Commission.

SECTION 7: CERTIFICATION

(a) Written certification of the completion and results of every stray voltage test and inspection undertaken and that all unsafe conditions identified have been remediated shall be made by an appropriate utility employee.

(b) The President or officer of each utility with direct responsibility for overseeing stray voltage testing shall provide an annual certification to the Commission that the utility exercised due diligence in carrying out a plan designed to meet the stray voltage testing requirements, including quality assurance, and, to the best of the officer's knowledge, the utility has tested all of its publicly accessible electric facilities and streetlights, except those identified in the February 15 report.

(c) The President or officer of each utility with direct responsibility for overseeing facility inspections shall provide an annual certification to the Commission that the utility has exercised due diligence in carrying out a plan designed to meet the inspection requirements, including quality assurance, and, to the best of the officer's knowledge, the utility has inspected the requisite number of electric facilities. Additionally, at the end of five-year inspection cycle, the officer shall certify that the utility has exercised due diligence in carrying out a plan designed to meet the inspection requirements, including quality assurance, and, to the best of the officer's knowledge, the utility has inspected all of its electric facilities during the previous five year period, except those identified in the February 15 report.

(d) Each utility shall maintain its written certifications and other documentary proof of its testing and inspections at its corporate office located within the State of New York. These documents shall be available to the public for review upon request and without conditions.

SECTION 8: NOTIFICATION REQUIREMENTS

Each utility shall comply with the Event Notification Requirements attached hereto.

SECTION 9: REPORTING REQUIREMENTS

(a) Each utility shall file a comprehensive report by February 15 each year that:

1. details the results of stray voltage tests and inspections conducted over the 12-month period ending December 31 of the prior calendar year;

2. addresses the performance mechanism specified in Section 10;

3. contains the certifications described in Section 7;

4. contains a breakdown of the voltage findings in a tabular format as detailed in Attachment 1; for all findings that result in a reading of 1 V or more after completion of mitigation efforts, the utilities shall provide a detailed report on those efforts;

5. contains a breakdown of the shock reports received from the public as detailed in Attachment 2;

6. discusses the analyses undertaken on the causes of stray voltage within the utility's electric system, the conclusions drawn there from, the preventative and remedial measures identified, and the utility's plans to implement those measures;

7. describes the priority levels used to gauge the severity of a deficiency, including repair timeframes, and details the requirements for training personnel to properly identify and categorize deficiencies**;**

8. contains a breakdown of facilities to be inspected, unique inspection conducted per year, and the cumulative number of unique inspections conducted to meet the five year requirement;

9. contains a breakdown of the deficiencies found, permanent repair actions taken by year, whether the repair was completed within the required timeframe, and the number of deficiencies awaiting repair. The information should be provided on a yearly basis by priority level and by equipment groupings as detailed in Attachment 3;

10. contains a review and analysis of the inspection results. Areas of concern should be identified along with remedial actions or future plans to alleviate inadequacies in current programs or assets;

11. describes the quality assurance program and provides the results from quality assurance activities conducted during the year; and

12. Includes all other information that is pertinent to the issues addressed by the safety standards.

SECTION 10: PERFORMANCE MECHANISM

(a) The annual performance target for stray voltage testing shall be 100% of all electric facilities and streetlights that must be tested. Facilities that are inaccessible and which pose no risk to public health and safety will not be considered in the determination of whether the target has been achieved.

(b) Failure to achieve the annual performance target for stray voltage testing shall result in a rate adjustment of 75 basis points.

(c) The annual performance target for inspections shall be based on the percentage of the average number of electric facilities that must be inspected each year in order to comply with the five-year inspection cycle. That is, the target is based on the one-fifth of the total number of the utility's electric facilities. The specific targets will be as follows:

First year inspection goal 85% of annual target

Second year inspection goal 90% of annual target

Annual inspection goal thereafter 95% of annual target

Fifth year inspection goal 100% of all facilities to be inspected

(d) Failure to achieve the annual performance target for inspections shall result in a rate adjustment of 75 basis points.

ATTACHMENT 1

Summary of Energized Objects

	Initial Readings				Readings after Mitigation		
	1-4.4 V	4.5-24.9 V	> 25 V	Totals	< 1 V	1 V-4.4 V	>4.5 V
Distribution Facilities							
Pole							
Ground							
Guy							
Riser							
Other							
Underground Facilities							
Service Box							
Manhole							
Padmount Switchgear							
Padmount Transformer							
Vault – Cover/Door							
Pedestal							
Other							
Street Lights / Traffic Signals							
Metal Street Light Pole							
Traffic Signal Pole							
Pedestrian Crossing Pole							
Traffic Control Box							
Other							
Substation Fences							
Fence							
Other							
Transmission (Total)							
Lattice Tower							
Pole							
Ground							
Guy							
Other							
Miscellaneous Facilities							
Sidewalk							
Gate/Fence/Awning							
Control Box							
Scaffolding							
Bus Shelter							
Fire Hydrant							
Phone Booth							
Control Box							
Water Pipe							
Riser							
Other							

ATTACHMENT 2

Summary of Shock Reports from the Public

	Quarterly Update	Yearly Total
I. Total Shock Calls Received:		
Unsubstantiated		
Normally Energized Equipment		
Stray Voltage:		
Person		
Animal		
II. Injuries Sustained/Medical Attention Received:		
Person		
Animal		
III. Stray Voltage Source:		
Utility Responsibility (Total)		
Overhead Distribution System		
Underground Distribution System		
Transmission System		
Other Utility/Gov't Agency (Total)		
Streetlight		
Other (Total)		
Customer Responsibility (Total)		
IV. Stray Voltage Range:		
1.0V to 4.4V		
4.5V to 24.9V		
25V and above		
Unknown		

Detail of Deficiences by Facilities																
Priority Level Repair Expected	I Within 1 week	II Within 1 year	III Within 3 years	I Within 1 week	II Within 1 year	III Within 3 years	I Within 1 week	II Within 1 year	III Within 3 years	I Within 1 week	II Within 1 year	III Within 3 years	I Within 1 week	II Within 1 year	III Within 3 years
Overhead Facilities															
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
Total Overhead Facilities															
Underground Facilities															
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
Total Underground Facilities															
Pad Mount Facilities															
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
Total Pad Mount Facilities															
Streetlight Facilities															
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
Total Streetlight Facilities															
Transmission Facilities															
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
Total Transmission Facilities															

ATTACHMENT 3

ATTACHMENT 3

Summary of Deficiencies and Repair Activity Resulting from the Inspection Process							
Year	**Prority Level / Repair Expected**		**Deficiencies Found (Total)**	**Repaired In Time Frame**	**Repaired - Overdue**	**Not Repaired - Not Due**	**Not Repaired - Overdue**
	I	Within 1 week					
	II	Within 1 year					
	III	Within 3 years					
	IV	N/A					
	I	Within 1 week					
	II	Within 1 year					
	III	Within 3 years					
	IV	N/A					
	I	Within 1 week					
	II	Within 1 year					
	III	Within 3 years					
	IV	N/A					
	I	Within 1 week					
	II	Within 1 year					
	III	Within 3 years					
	IV	N/A					
	I	Within 1 week					
	II	Within 1 year					
	III	Within 3 years					
	IV	N/A					

EVENT NOTIFICATION REQUIREMENTS

ALL NOTIFICATIONS SHALL BE MADE WITHIN ONE HOUR OF AN INCIDENT OR EVENT UNLESS OTHERWISE SPECIFIED

I. System Control - Reports of Impending Emergencies, Emergencies, and Load Curtailment

A. Requests for curtailed electric use, voltage reductions, and load shedding initiated to maintain the adequacy of the electric system and significant bulk supply outages or accidents of consequence are to be reported to the Office of Electric, Gas and Water. The specific items to be brought to the Office's attention are as follows:

1. Any decision to issue a request for customer reduction in use of electricity. The Office of Electric, Gas and Water is to be notified at the time of decision to issue any such request.

2. Any action to maintain the adequacy of the bulk electric system by reducing firm customer loads by voltage reductions, manual switching, operation of automatic load shedding devices, or any other means. The Office of Electric, Gas and Water is to be notified at the time of decision to take such action.

3. Any bulk supply outage that has, or could have, a significant impact on the utility's electric system or the state-wide system.

B. The following information is to be included in the reports:

1. For Items I.A.1. and I.A.2., the utility shall provide the approximate area(s) affected the time of the action, the time and/or an estimate of the time of restoration of normal service (or cancellation of a customer request), an estimate of the amount of load reduction expected or load interrupted, and the number of customers affected if load is interrupted.

2. For Item I.A.3., the utility shall provide a description of the incident and events leading to its occurrence, the time of occurrence, the system(s) affected, and an evaluation of the effect on the system(s).

II. Loss of Electric Service

A. Written reports of electric service interruptions of five minutes or more are required by 16 NYCRR Part 97. Such reports are to be prepared in accordance with the regulations and submitted to the Office of Electric, Gas and Water.

B. Additionally, notice is to be made for each of the following events:

1. Loss of electric service to 5,000 customers or more lasting 30 minutes or more;

2. Any loss of a distribution system network;

3. Loss if service resulting from load shedding; and

4. Implementation of voltage reduction

C. Notice of these events requires telephonic notification during business hours. Events occurring after business hours shall be reported as prescribed by the Director of the Office of Electric, Gas and Water

D. The following information should be provided in the notice:

1. The approximate territory affected.

2. The date and time of the incident causing the interruption.

3. The expected duration of the interruption.

4. If restored at the time of the call, the date and time of restoration.

5. The number of customers affected and amount of load involved.

6. A listing of any critical services affected.

7. A description of the incident and its cause.

8. Any follow-up actions planned

III. Reports of Personal Injury Accidents

A. Notification of electric system personal injury accidents and deaths are required by 16 NYCRR Part 125. This requirement applies to all electric system accidents that result in injury or death to a non-employee and/or inpatient hospitalization or death to an employee or contractor employed by the utility, including accidents that occur at generating plants.

B. All reports are to be made in accordance with the regulations and the following requirements and submitted to the Office of Electric, Gas and Water.

1. Reports for accidents, except those involving a fatality or major media attention, occurring after business hours shall be made no later than 8:30 a.m. of the next business day.

2. Written reports shall be made using the Department's standard form and may be submitted via e-mail or fax.

3. Reports should include the following information:

a. The location of the accident.

b. The date and time of the accident.

c. Whether or not the injured party is a utility employee or contractor.

d. A description of the injuries sustained and the status of the injured party.

e. A description of the accident and its cause.

f. The time the utility received notification of the incident.

g. The time the first utility personnel arrived at the scene.

h. The time qualified utility personnel arrived at the scene (i.e.,personnel capable of addressing any safety hazard).

i. Whether response operations were affected until utility personnel arrived.

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IV. Report of Shock Incidents and Motor Vehicle Accidents

A. All electric shock incidents shall be reported via the EIRS system.

B. Electric shock incidents involving animals shall be reported.

C. Motor vehicle accidents involving utility facilities in which there is a fatality, personal injury, or delay in rescue operations shall be reported.

D. Reports for incidents occurring after business hours shall be made no later than 8:30 a.m. of the next business day.

E. The reports should include the following information:

1. The location of the incident.

2. The date and time of the incident.

3. Whether or not the party who was shocked or injured, as appropriate, is a utility employee or contractor.

4. A description of the condition of the affected party, and, as appropriate, of the injuries sustained.

5. A description of the incident and its cause.

6. The time the utility received notification of the incident.

7. The time the first utility personnel arrived at the scene.

8. The time qualified utility personnel arrived at the scene (i.e., personnel capable of addressing any safety hazard).
9. Whether response operations were affected until utility personnel arrived.

V. Major Events

Immediate telephonic notification regardless of the time of day is to be made for major events associated with a utility's electric system that will likely result in widespread media attention. Examples of major events include, but are not limited to, load shedding, catastrophic storm emergencies, floods, fires, or nuclear radiation releases.

Notification via the EIRS system is also to be made whenever a utility's corporate emergency command center (e.g., storm center) becomes operational.

VI. Manner of Notification

Except where otherwise noted above, the Director of the Office of Electric, Gas and Water shall prescribe the manner in which notice to Staff is to be provided.