# 16 NYCRR 255.481(d) – Atmospheric Corrosion Control: Monitoring

255.481(d), states, "If atmospheric corrosion is found on a service line during the most recent inspection, then the next inspection of that pipeline or portion of pipeline must be within 3 calendar years, but with intervals not exceeding 39 months."

The Company failed to conduct and/or document an atmospheric corrosion inspection within 3 calendar years, not exceeding 39 months.

#### **Company Response:**

To facilitate an accelerated Inside Service Line Inspection (ISLI) schedule, the Company's ISLI vendor has ramped up their workforce. Additionally, NYSEG personnel have begun to complete ISLI in addition to contracted workforce in some divisions. The Company also procured the services of a separate call center vendor to send out notices to customers via mail, receive customer calls, schedule appointments, and call customers who have not yet scheduled an appointment.

The Company has expanded reporting to include compliance schedules on a meter-by-meter basis to prevent further occurrences of non-compliance. This includes new interactive dashboards that indicate a 30/60/90-day forecast of upcoming compliance inspections. This new reporting is available to a broader audience to increase transparency and oversight. The Company is projected to be fully compliant by the end of 2025.

# 16 NYCRR 255.723(b)(1) – Distribution Systems: Leakage Surveys and Procedures

255.723(b)(1), states, "A leakage survey with leak detector equipment shall be conducted at intervals not exceeding 15 months, but at least once each calendar year, in business districts within the operator's gas franchise area including tests of the atmosphere of gas, electric, telephone, sewer, and water system manholes, at cracks in pavement, at the curbline, in the sidewalk, and at other locations providing an opportunity for finding gas leaks."

The Company failed to conduct and/or document a leakage survey at intervals not to exceed 15 months, but at least once each calendar year.

## **Company Response:**

To facilitate an accelerated Inside Service Line Inspection (ISLI) schedule, the Company's ISLI vendor has ramped up their workforce. Additionally, NYSEG personnel have begun to complete ISLI in addition to contracted workforce in some divisions. The Company also procured the services of a separate call center vendor to send out notices to customers via mail, receive customer calls, schedule appointments, and call customers who have not yet scheduled an appointment.

The Company has expanded reporting to include compliance schedules on a meter-by-meter basis to prevent further occurrences of non-compliance. This includes new interactive dashboards that indicate a 30/60/90-day forecast of upcoming compliance inspections. This new reporting is available to a broader audience to increase transparency and oversight. The Company is projected to be fully compliant by the end of 2025.

## 16 NYCRR 255.723(b)(3) – Distribution Systems: Leakage Surveys and Procedures

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

The Company failed to conduct and/or document a leakage survey at least once every three calendar years, at intervals not exceeding 39 months.

## **Company Response:**

Deployment of a digital work management system for leak survey map completion tracking is underway and progress has been made. This will increase visibility of survey compliance status, enabling better oversight and performance. The company is in the process of hiring two supervisors to provide additional oversite for this process. The supervisors are anticipated to begin work by the end of April 2025.

The Company has expanded reporting to include compliance schedules on a meter-by-meter basis to prevent further occurrences of non-compliance. This includes new interactive dashboards that indicate a 30/60/90-day forecast of upcoming compliance inspections. This new reporting is available to a broader audience to include transparency and oversight. The Company is projected to be fully compliant by the end of 2025.