

NYSEG and RG&E Annual Gas Safety Report 2025 Calendar Year

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In accordance with the requirements outlined in Appendix L of New York State Electric & Gas (NYSEG) and Rochester Gas and Electric's (RG&E, and together, the Companies) Joint Proposal in Cases 22-E-0317 et. al., the results for NYSEG and RG&E's Gas Safety Performance measures are set forth below. Additionally, the Companies include the required information to comply with Section 66-U of NY Public Service Law within the sections covering gas safety measures required by the Joint Proposal, and in Section 11 of this report.

1. NYSEG Leak Prone Pipe ("LPP")¹

- i. **Target:** NYSEG will replace, at a minimum, 24 miles of LPP in calendar year (CY) 2025. If the annual mileage target is not met in calendar years 2023, 2024, or 2025, then a 3-year cumulative target of 81 miles can be used as the target.
- ii. **Performance:** NYSEG retired 28.11 miles of LPP in calendar year 2025.

The NYSEG projects cut dead in calendar year 2025 are included in Appendix 1, which includes the material type, mileage, project location, rank/score of the segments addressed at the time of replacement, removal or retirement in place, and project cost. The NYSEG/RG&E risk ranking is a scoring system based on the NYSEG/RG&E Distribution Integrity Management Program and an average is specified for all listed projects.

The 2026 forecast of NYSEG LPP projects and their rank on the risk-based model are included in Appendix 2. Unanticipated stakeholder requirements and/or external conditions may affect the forecasted list of LPP removal projects throughout the 2026 calendar year.

The NYSEG reconciliation of the 2025 forecasted LPP to 2025 completed LPP projects is provided in Appendix 3.

2. NYSEG Leak Backlog Management

- i. **Target:** The year-end total leak backlog (Types 1, 2, 2A, and 3) target for NYSEG in calendar year 2025 is 30 leaks. Targets for total leak backlog can be met at any point from December 21 to December 31 of each calendar year.
- ii. **Performance:** The year-end total leak backlog for NYSEG as of December 31, 2025, was one (1) leak. One (1) leak was identified beginning 12/30/2025 until 12/31/2025.

3. NYSEG Emergency Response

- i. **Target:** For calendar year 2025, NYSEG will respond to 75% of all gas leak and odor calls within 30 minutes, 90% of all gas leak and odor calls within 45 minutes, and 95% of all gas leak and odor calls within 60 minutes.

¹ May also be referred to as Leak Prone Main ("LPM") within this document or appendices.

- ii. **Performance:** NYSEG’s 2025 Emergency Response results are as follows:

NYSEG Emergency Response	CY 2025 Target	CY 2025 Performance
Within 30 minutes	75%	78.29%
Within 45 minutes	90%	94.48%
Within 60 minutes	95%	98.81%

4. NYSEG Gas Safety Field and Record Audit Compliance

- i. **Target:** The calendar year 2025 compliance measure applies to instances of non-compliances (occurrences or violations) of specific gas pipeline safety-related regulations as outlined in Appendix L, Attachment 1 of the Joint Proposal in Case 22-E-0317 et al.
- ii. **Performance:** As of the date of this filing, NYSEG has received the field and record audit reports from DPS Safety Staff. The Company, following the language in Appendix L, Attachment 1 of the Joint Proposal in Case 22-E-0317 et al., has provided a 30-day and 90-day response to the record audit reports on November 26, 2025 and January 28, 2026, respectively, and a 30-day response to the field audit report on February 13, 2026.

The table depicted below outlines the High Risk and Other violations the Company has been assessed in the field and record audit reports from DPS Safety Staff. These figures are not considered final until such time as the Company receives the official audit report letter from DPS Safety Staff.

NYSEG	Violation Type	
	High Risk	Other Risk
2025 Audits		
Field	2	0
Record*	39	57

*Audit performed in calendar year 2025 reflects compliance activities in calendar year 2024

5. NYSEG Damage Prevention

- i. **Target:** For calendar year 2025, NYSEG is subject to the damage prevention targets as outlined in Appendix L of the Joint Proposal in Case 22-E-0317 et. al. with a target of less than 2 damages per 1,000 one call notifications.
- ii. **Performance:** NYSEG’s 2025 damage prevention rate is 1.72 damages per 1,000 one call notifications.

6. RG&E Leak Prone Pipe (“LPP”)

- i. **Target:** RG&E will replace, at a minimum, 24 miles of LPP in calendar year 2025. If the annual mileage target is not met in calendar years 2023, 2024, or 2025, then a 3-year cumulative target of 81 miles can be used as the target.
- ii. **Performance:** RG&E retired 23.04 miles of LPP in 2025 and thus met the 3-year cumulative target of 81 miles of LPP in calendar years 2023, 2024, and 2025 with a total of 81.24 miles.

The RG&E projects cut dead in calendar year 2025 are included in Appendix 4, which includes the material type, mileage, project location, rank/score of the segments addressed at the time of replacement, removal or retirement in place, and project cost. The NYSEG/RG&E risk ranking is a scoring system based on the NYSEG/RG&E Distribution Integrity Management Program and an average is specified for all listed projects.

The 2026 forecast of RG&E LPP projects and their rank on the risk-based model are included in Appendix 5. Unanticipated stakeholder requirements and/or external conditions may affect the forecasted list of LPP removal projects throughout the 2026 calendar year.

The RG&E reconciliation of the 2025 forecasted LPP to 2025 completed LPP projects is provided in Appendix 6.

7. RG&E Leak Backlog Management

- i. **Target:** The year-end total leak backlog (Types 1, 2, 2A, and 3) target for RG&E in calendar year 2024 is 30 leaks. Targets for total leak backlog can be met at any point from December 21 to December 31 of each calendar year.
- ii. **Performance:** The year-end total leak backlog for RG&E as of December 31, 2025, was three (3) leaks. Three (3) leaks were identified beginning 12/22/2025 until 12/31/2025.

8. RG&E Emergency Response

- i. **Target:** For calendar year 2025, RG&E will respond to 75% of all gas leak and odor calls within 30 minutes, 90% of all gas leak and odor calls within 45 minutes, and 95% of all gas leak and odor calls within 60 minutes.
- ii. **Performance:** RG&E’s 2025 Emergency Response results are as follows:

RG&E Emergency Response	CY 2025 Target	CY 2025 Performance
Within 30 minutes	75%	77.43%
Within 45 minutes	90%	92.00%
Within 60 minutes	95%	96.67%

9. RG&E Gas Safety Field and Record Audit Compliance

- i. **Target:** The calendar year 2025 compliance measure applies to instances of non-compliances (occurrences or violations) of specific gas pipeline safety-related regulations as outlined in Appendix L, Attachment 1 of the Joint Proposal in Case 22-E-0317 et al.
- ii. **Performance:** As of the date of this filing, RG&E has received the field and record audit reports from DPS Safety Staff. The Company, following the language in Appendix L, Attachment 1 of the Joint Proposal in Case 22-E-0317 et al., will provide a 30-day and 90-day response to the record audit reports on February 27, 2026 and no later than April 30, 2026, respectively, and a 30-day response to the field audit report on February 27, 2026.

The table depicted below outlines the High Risk and Other violations the Company has been assessed in the final draft field and record audit reports from DPS Safety Staff. These figures are not considered final until such time as the Company receives the official audit report letter from DPS Safety Staff.

RG&E	Violation Type	
2025 Audits	High Risk	Other Risk
Field	1	1
Record*	12	11

*Audit performed in calendar year 2025 reflects compliance activities in calendar year 2024

10. RG&E Damage Prevention

- iii. **Target:** For calendar year 2025, RG&E is subject to the damage prevention targets as outlined in Appendix L of the Joint Proposal in Case 22-E-0317 et. al. with a target of less than 2 damages per 1,000 one call notifications.
- i. **Performance:** RG&E’s 2025 damage prevention rate is 1.43 damages per 1,000 one call notifications.

11. Additional Pipeline Safety Information Pursuant to Article 4, Section 66-U

i. **Pipeline Replacement Projects:**

Leak Prone Pipe is identified via potential integrity risks recognized within the Distribution Integrity Management Program (DIMP), including, but not limited to, construction methods, vintage, material type, leak history, and reported field conditions. The Companies utilize an algorithm to weigh and score identified integrity risks on a segment-by-segment basis to provide a relative risk ranking for recommended LPP segments. Replacement projects are established and planned based upon the identified segments’ risk ranking. System constraints such as operational limitations, municipal construction activities,

municipal or other permitting limitations, and non-pipeline alternative evaluations are also considered.

Leak Prone Pipe segments not considered within a given calendar year are monitored to capture changes in risk that may require reconsideration and re-prioritization for replacement.

Leak Prone Pipe prioritization is completed annually; however, it may also take place on an ad-hoc basis due to emergent awareness of conditions that could impact integrity, risk, and DIMP objectives. Establishment of LPP replacement projects is completed on an annual basis utilizing the current updated segment prioritization data. System replacement of LPP segments is completed through planned construction projects on an annual basis in accordance with established Joint Proposal Gas Safety Performance Measures.

ii. Description of the Companies' O&M Activities related to Gas Safety

The Companies' Operating & Maintenance (O&M) activities related to gas safety are based on 49 CFR Part 192 and Part 255/261/753 of the NY State code rule as detailed in the following O&M Sections:

- Section 1. General
- Section 2. Welding
- Section 3. Plastic Pipe Joining
- Section 4. Corrosion Control
- Section 5. Test Requirements
- Section 6. Upgrading/ Conversations
- Section 7. Inspections/ Surveys
- Section 8. Operations and Maintenance
- Section 9. Emergency

- Section 10. Facilities Beyond the Meter
- Section 11. Safety

iii. Description of the Companies' Inspections Regarding Transmission and Distribution Lines

The Companies' inspections regarding transmission and distribution lines are based on 49 CFR Part 192 and Part 255 of the NY State Code Rule and are detailed in the O&M Manual and the Transmission Integrity Management Plan (TIMP).

iv. Leak Repair Information:

Per Appendix L of the Joint Proposal in Cases 22-E-0317 et al., targets for year-end leak backlogs can be met at any point from December 21 to December 31 of each calendar year. As of December 31, 2025, NYSEG and RG&E had one and three open leaks, respectively.

Below is a depiction of the leak monitoring figures for NYSEG and RG&E in 2025.

2025 Year-End Leak Repair Figures		
	NYSEG	RG&E
Leaks Discovered in 2025	184	403
Leaks Repaired in 2025*	181	404
Open Leaks**	1	3

*Includes 3 NYSEG and 5 RG&E leaks discovered in prior years

**As of December 31, 2025

v. First Responder Training

In 2025, the following trainings were provided by NYSEG and RG&E within the appropriate service territories on pipeline safety and emergency response to local fire groups.

- NYSEG provided 51 trainings to fire departments.
- RG&E provided 36 trainings to fire departments.

Additional training was provided in 2025 to include UDIG Damage Prevention Conference and Paradigm Liaison Services.

Topics that were covered during the training were:

- Introduction
- Natural Gas Delivery System
- Properties and Characteristics of Natural Gas
- Carbon Monoxide “The Silent Killer”
- Responding to Natural Gas Emergencies:
 - Inside and Outside Leaks
 - Inside and outside gas fires
 - Outside damage
 - Explosions
 - Damage Prevention
 - Flooding

The dates and groups in attendance are included in Appendix 7. The records do not always include the specific times that the trainings were held. No applicable recommendations were made.

12. Conclusion

The following tables summarize the NYSEG and RG&E gas safety performance measure results and the estimates of the associated revenue adjustments. The estimated net total revenue adjustments will be (\$4,254,336.50), including capped occurrences and PRAs.

NYSEG				
Performance Measures	CY 2025 Target	CY 2025 Performance	BP	Revenue Adjustment
Replacement of Leak Prone Pipe	> 24	28.11	0	\$ -
Leak Management - Leak Backlog	< 30	1	6	\$ 320,514.00
Total Excavation Damages	2 per 1,000	1.72	0	\$ -
Emergency Response 30 min	> 75%	78.29%	0	\$ -
Emergency Response 45 min	> 90%	94.48%	0	\$ -
Emergency Response 60 min	> 95%	98.81%	0	\$ -
25 Audit of '24 Records: High Risk Violations	<= 5	177	-38.5	\$ (2,056,626.56)
25 Field Audit: High Risk Violations	<= 0	2	-1	\$ (53,418.87)
25 Audit of '24 Records: Other Risk Violations	<= 15	300	-14.5	\$ (774,573.64)
25 Field Audit: Other Risk Violations	<= 0	0	0	\$ -
Total NYSEG			-48	\$ (2,564,105.07)

RG&E				
Performance Measures	CY 2025 Target	CY 2025 Performance	BP	Revenue Adjustment
Replacement of Leak Prone Pipe	> 24	23.04*	0	\$ -
Leak Management - Leak Backlog	< 30	3	6	\$ 269,952.00
Total Excavation Damages	2 per 1,000	1.43	0	\$ -
Emergency Response 30 min	> 75%	77.43%	0	\$ -
Emergency Response 45 min	> 90%	92.00%	0	\$ -
Emergency Response 60 min	> 95%	96.67%	0	\$ -
25 Audit of '24 Records: High Risk Violations	<= 5	78	-31.5	\$ (1,417,254.85)
25 Field Audit: High Risk Violations	<= 0	2	-1	\$ (47,409.79)
25 Audit of '24 Records: Other Risk Violations	<= 15	134	-10.75	\$ (483,666.34)
25 Field Audit: Other Risk Violations	<= 0	1	-0.25	\$ (11,852.45)
Total RG&E			-37.5	\$ (1,690,231.43)

* Met cumulative three-year goal of > 81 miles