

# **Orange and Rockland Utilities, Inc.**

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## **STRAY VOLTAGE TESTS AND FACILITY INSPECTIONS**

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**Report on the results of stray voltage tests and facility inspections  
for the annual period ended December 31, 2013**

**February 15, 2014**

**Pearl River, New York**

## Table of Contents

<b>I.</b>	<b>Background .....</b>	<b>2</b>
<b>II.</b>	<b>Company Overview .....</b>	<b>2</b>
<b>III.</b>	<b>Stray Voltage Testing Program .....</b>	<b>2</b>
<b>IV.</b>	<b>Facility Visual Inspection Program.....</b>	<b>4</b>
<b>V.</b>	<b>Program Facilities.....</b>	<b>6</b>
<b>VI.</b>	<b>Annual Performance Targets.....</b>	<b>7</b>
<b>VII.</b>	<b>Certifications.....</b>	<b>9</b>
<b>VIII.</b>	<b>Analysis of Causes of Findings and Stray Voltage.....</b>	<b>9</b>
<b>IX.</b>	<b>Inspection Results and Analysis.....</b>	<b>10</b>
<b>X.</b>	<b>Quality Assurance and Control.....</b>	<b>12</b>
<b>XI.</b>	<b>Other Pertinent Information .....</b>	<b>14</b>
	<b>Appendix 1: Stray Voltage Testing Summary.....</b>	<b>15</b>
	<b>Appendix 2: Summary of Energized Objects.....</b>	<b>16</b>
	<b>Appendix 3: Summary of Shock Reports from the Public.....</b>	<b>17</b>
	<b>Appendix 4: Summary of Deficiencies and Repair Activity Resulting from the Inspection Process.....</b>	<b>18</b>
	<b>Exhibit 1: Certifications .....</b>	<b>46</b>

## **I. Background**

The New York State Public Service Commission's ("PSC" or "Commission") Electric Safety Standards issued on January 5, 2005 (Case 04-M-0159, with subsequent revisions issued on July 21, 2005, December 15, 2008 and March 22, 2013 ("Safety Standards")<sup>1</sup>, require electric utilities in New York State to annually stray voltage test their publicly accessible underground electric facilities, including but not limited to, manholes, service boxes, and transformer vaults. Stray voltage testing shall be conducted on the exposed surfaces of the facilities. Annual stray voltage testing shall also be conducted on Company and non-Company owned, publically accessible, metallic street light and traffic signal poles located in public thoroughfares in the Company's service territory. The Safety Standards also require the Company to stray voltage test overhead distribution facilities, underground residential distribution facilities, overhead and underground transmission facilities, and substation fences concurrently with the facility five year inspections required by the Safety Standards.

This Stray Voltage Tests and Facility Inspections Report ("Report") describes the stray voltage detection program and equipment inspection program Orange and Rockland Utilities, Inc. ("O&R" or the "Company") conducted in 2013.

## **II. Company Overview**

O&R is an investor-owned utility that provides electric service to approximately 224,600 customers in a service area of approximately 1,000 square miles within Rockland County and parts of Orange and Sullivan Counties, New York. The Company operates an electric transmission and distribution ("T&D") system that includes 198 distribution circuits with approximately 3,041 overhead circuit miles and 1,700 conductor miles of underground cable, nearly 300 transmission circuit miles, 45 distribution substations, 2 distribution switchyards, 7 transmission substations, 4 transmission/distribution substations, 6 transition structures located in 3 transition yards and 4 transmission switchyards. The Company also owns the transmission interconnections to 7 substations<sup>2</sup> for single industrial customers.

## **III. Stray Voltage Testing Program**

### **➤ Testing personnel**

O&R conducted separate stray voltage test programs for its transmission system and its distribution system. Non-Company labor (i.e., contractors), selected through

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<sup>1</sup> 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), Order on Petitions for Rehearing and Waiver (issued July 21, 2005), Order Adopting Changes to Electric Safety Standards (issued December 15, 2008) and Order Adopting Changes to Electric Safety Standards (issued March 22, 2013) ("March 22, 2013 Order").

<sup>2</sup> O&R previously reported 11 substations for single industrial customers. One substation for single industrial customers is no longer in service. To align with FERC reporting, three have been reclassified; two are classified as distribution substations and one is classified as a transmission substation.

O&R's bid selection process, was used to perform the test work associated with each program.

➤ Equipment

To test for stray voltage, the contractor's inspectors used HD Electric Company LV-S-5 Direct Contact Low Voltage Detectors. This HD device is an independently certified low voltage AC test probe.<sup>3</sup> These probes were used to detect AC voltage on publicly accessible, conductive equipment or apparatus.

➤ Training

O&R trains the contractor personnel on the contact voltage testing and program requirements. The participants include the contractor's planners, field supervisors and administrative staff assigned to O&R's project. Subsequently, the contractor is required to train new personnel. Prior to the start of annual testing, all contractor personnel are required to attend a one day refresher course, conducted by the Company. The initial two day training program and refresher course include a review of:

- The Safety Standards;
- Company policies and procedures;
- Personal protective equipment;
- Scope of the work for stray voltage testing;
- Completing the testing form;
- Data entry process; and
- Hand-held devices and laptop requirements (increases data entry efficiency).

➤ Stray Voltage Testing

During the annual period ended December 31, 2013, O&R conducted stray voltage testing of its publicly accessible underground electric facilities, including but not limited to, manholes, service boxes, and transformer vaults. Stray voltage testing was conducted on the exposed surfaces of the facilities. Annual stray voltage testing was also conducted on Company and non-Company owned, publically accessible, metallic street light and traffic signal poles located in public thoroughfares in the Company's service territory. In addition, the Company performed stray voltage tests on its overhead distribution facilities and underground residential distribution facilities, concurrently with the facility five year inspections required by the Safety Standards.

In accordance with the Safety Standards, O&R:

- a. Immediately safeguarded and /or mitigated the one voltage findings  $\geq 1.0$  volt identified in 2013. In 2013, there were no instances where the stray voltage finding was determined to be caused by customer-owned equipment. The one

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<sup>3</sup> The HD device is certified to detect AC voltage within a range of 5 volts to 600 volts.

instance where voltage findings were determined to be caused by a utility-owned facility, the area was immediately safeguarded and the condition was mitigated. Permanent repairs were made within 45 days; and,

- b. Tested all publicly accessible structures and sidewalks within a 30 foot radius of the electric facility where there was a stray voltage finding  $\geq 1.0$  volt.

There are 170,648 structures that comprise O&R's T&D system and 2,058 non-Company owned metallic street light and traffic signal poles. Among the Company-owned structures, there are structures that did not require stray voltage testing for one or more of the following reasons:

- Wood poles that have no attached appurtenances capable of conducting electricity;
- Wood poles with electrically conductive appurtenances that are not accessible to the public (pre-wired wood);
- The facility is enclosed in fiberglass (non-conductive materials);
- The facility is de-energized; and/or
- The facility is deemed inaccessible to the public.

Inaccessible facilities include:

- a. Locked Gate/Fence – Poles behind locked gates and fences that are not accessible to the public, i.e., facilities located in fenced areas owned by other utilities, such as, water companies.
- b. Dangerous Grades – Poles located on cliffs and other dangerous grades are generally inaccessible to Company personnel and are approached only under urgent circumstances. The performance of stray voltage testing would constitute an unacceptable risk to the employee.
- c. Company Property – Poles located on Company property, such as substations, are accessible only to Company personnel and authorized contractors.
- d. Vaults - Structures located inside buildings. These structures are accessible only to Company and building maintenance personnel.
- e. Limited Access Highway Facilities – Structures located on highways, exit and entrance highway ramps. The performance of stray voltage testing would constitute an unacceptable risk to the employee.

In accordance with the Commission's March 22, 2013 Order, O&R was not required to perform mobile testing during the annual period ended December 31, 2013 because there is no city with a population of at least 50,000 located in the Company's service area and the Company does not have an underground network system where mobile testing is effective.

#### **IV. Facility Visual Inspection Program**

O&R conducted the majority of the visual inspections in conjunction with its stray voltage testing program. Separate visual inspections were performed on its fiberglass

and de-energized facilities. Contractors performed the majority of the stray voltage tests and visual inspections.

The Safety Standards require O&R to visually inspect approximately 20% of its facilities annually, resulting in 100% inspection of its electric facilities every five years.

O&R visually inspects its distribution system on a five-year cycle, as prescribed by the Safety Standards and inspects its transmission system annually.

➤ Training

O&R trains the contractor personnel on the visual inspection program requirements. The participants include the contractor's planners, field supervisors and administrative staff assigned to O&R's project. Subsequently, the contractor is required to train new personnel. Prior to the start of annual testing, all contractor personnel are required to attend a one day refresher course. The initial two day training program and refresher course include a review of:

- The Safety Standards;
- Company policies and procedures;
- Personal protective equipment;
- Scope of the work for visual inspections;
- Completing the visual inspection form;
- Data entry process; and
- Hand-held devices and laptop requirements (increases data entry efficiency).

➤ Inspection Findings

In accordance with the Safety Standards, O&R classifies defects found on inspection by the following severity levels to establish priority for repairs and scheduling:

- Level I – Repair as soon as 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 represents 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.

Appendix 4, Summary of Deficiencies and Repair Activity Resulting from the Inspection Process, to this Report contains the following information:

- 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 is provided on a yearly basis by priority level and by equipment groupings.

#### V. Stray Voltage Testing and Inspection Program Facilities

- Structure Categories – There are 170,648 structures that comprise O&R’s T&D system and 2,058 non-Company owned street lights and traffic signals. The Company facilities are broken down into the following four main categories:
- Distribution Overhead – There are 133,129 distribution pole structures in O&R’s territory. Twenty percent of the distribution overhead facilities are included in both the stray voltage and inspection programs. The stray voltage testing criteria include all publicly accessible utility-owned or joint-use wooden poles with utility electrical facilities located on public thoroughfares or customer property, including backyards or alleys. Stray voltage tests are performed on all wooden poles with metallic attachments such as ground wires, ground rods, anchor guy wires, riser pipes, or any electrical equipment within reach of the general public.
- Underground Facilities – There are 30,361 underground facilities in O&R’s system. Twenty percent of the facilities are included in both the stray voltage (with the exception of fiberglass hand hole covers) and inspection programs. The stray voltage testing criteria includes subsurface structures and above ground structures. Included in the above ground structures are pad mount transformers and switchgear enclosures. All subsurface structures include electric utility manhole covers, submersible transformer covers and electric utility metal hand hole covers.
- Street Lights and Traffic Signals – Of the 2,544 metallic street light poles and traffic signals within O&R’s service territory, 486 are Company-owned street lights. The remaining street lights and traffic signals are owned by municipalities. All metallic street light and traffic signal poles are included in O&R’s annual stray voltage testing program. The Company-owned streetlights are included in the facility inspection program. Privately owned street lighting is not included in the stray voltage testing program, as per the Safety Standards. The stray voltage testing criteria include all

metallic street light poles, traffic signals, and pedestrian crosswalk signals located on publicly accessible thoroughfares. The large majority of street lights in O&R’s service area are mounted on wooden poles, and do not require stray voltage testing because their electrically conductive surfaces are not accessible to the public. All stray voltage testing of street lights is performed at night while the fixtures are energized.

- Substation Fences and Transmission Structures – There are 69 substation fences and approximately 6,603 individual poles and towers that comprise O&R’s overhead transmission system. Transmission structures support circuit voltages of 34.5 kilovolts and greater. Transmission poles with distribution under build are included in this transmission category. O&R inspects its transmission system annually. Stray voltage testing was performed on all transmission structures and substation fences in 2012. The stray voltage testing criteria includes all structures, guys, and down leads attached to the structures. As per the Safety Standards, stray voltage testing is required to be performed again in 2017.

**VI. Annual Performance Targets**

O&R performed the required stray voltage testing and facility inspections in accordance with the requirements and performance mechanism targets set forth in the Safety Standards.

In compliance with the Safety Standards, O&R has met the annual performance target for stray voltage testing for the annual period ended December 31, 2013. The structures tested and testing results are set forth in Appendix 1, Stray Voltage Testing Summary, of this Report.

In compliance with the Safety Standards, O&R has met the performance target for inspection of 20% of its electric facilities for the annual period ending December 31, 2013. The results are summarized in the tables set forth below.

**Inspection Performance Summary**

**170,648 Total O&R Transmission and Distribution Structures**

<b>Inspection Year</b>	<b>Number of Transmission and Distribution Structures Inspected in 2013</b>	<b>% of Transmission and Distribution Structures Inspected in 2013</b>	<b>Cumulative % of Transmission and Distribution Structures Inspected During 5-Year Cycle 2010 – 2014</b>
<b>2013</b>	<b>43,846</b>	<b>26%</b>	<b>89%</b>



**133,129 Total Overhead Distribution Structures**

<b>Inspection Year</b>	<b>Number of Overhead Distribution Structures Inspected in 2013</b>	<b>% of Overhead Distribution Structures Inspected in 2013</b>	<b>Cumulative % of Overhead Distribution Structures Inspected During 5-Year Cycle 2010 – 2014</b>
<b>2013</b>	<b>27,063</b>	<b>20%</b>	<b>88%</b>

**6,672 Total Overhead Transmission Structures**

<b>Inspection Year</b>	<b>Number of Overhead Transmission Structures Inspected in 2013</b>	<b>% of Overhead Transmission Structures Inspected in 2013</b>	<b>Cumulative % of Transmission Structures Inspected During 5-Year Cycle 2010 – 2014</b>
<b>2013<sup>4</sup></b>	<b>6,672<sup>5</sup></b>	<b>100%</b>	<b>400%</b>

**15,007 Total Underground Structures**

<b>Inspection Year</b>	<b>Number of Subsurface Structures Inspected in 2013</b>	<b>% of Subsurface Structures Inspected in 2013</b>	<b>Cumulative % of Subsurface Structures Inspected During 5-Year Cycle 2010 – 2014</b>
<b>2013</b>	<b>9,459</b>	<b>63%</b>	<b>79%</b>

**15,354 Total Pad Mount Transformers**

<b>Inspection Year</b>	<b>Number of Pad-mounted Equipment Inspected in 2013</b>	<b>% of Pad-mounted Equipment Inspected in 2013</b>	<b>Cumulative % of Pad-mounted Equipment Inspected During 5-Year Cycle 2010 - 2014</b>
<b>2013</b>	<b>289</b>	<b>2%</b>	<b>100%</b>

**486 Total O&R Street Lights**

<b>Inspection Year</b>	<b>Number of Street Lights Inspected in 2013</b>	<b>% of Street Lights Inspected in 2013</b>	<b>Cumulative % of Street lights inspected during 5-Year Cycle 2010 – 2014</b>
<b>2013</b>	<b>363</b>	<b>75%</b>	<b>100%</b>

<sup>4</sup> O&R visually inspects its transmission system annually.

<sup>5</sup> The total includes 69 substation fences.

## VII. Certifications

Pursuant to Section 7 of the Safety Standards, the president or officer of each utility with direct responsibility for overseeing stray voltage testing and facility inspections shall provide an annual certification to the Commission that the utility has, to the best of his or her knowledge, exercised due diligence in carrying out a plan, including quality assurance, that is designed to meet the stray voltage testing and inspection requirements, and that the utility has:

- Tested all of its street lights and traffic signals within the service territory. Publically accessible overhead distribution facilities, underground residential facilities were tested concurrently with the facility inspection required in Section 4 of the Electric Safety Standards, as referred to in the body of this Report; and
- Inspected the requisite number of electric facilities.

The certifications are attached as Exhibit 1 of this Report.

## VIII. Results of Stray Voltage Tests and Causes of Findings of Stray Voltage

- Of the 170,648 electrical structures that comprise O&R's T&D system and 2,058 non-Company owned equipment, 40,103 distribution structures were visited and/or stray voltage tested as part of its stray voltage-testing program for 2013. O&R stray voltage tested its transmission system in 2012. Pursuant to the Safety Standards, stray voltage testing is required to be performed again in 2017.

The chart below describes all Findings  $\geq 1.0$  volt identified and mitigated.<sup>6</sup>

<i>Structure Type</i>	<i>Cause of Voltage</i>	<i>Voltages Found <math>\geq 1</math> Volt</i>
Distribution Pole	Primary wire was in contact with the ground wire.	1

One voltage findings  $\geq 1$  volt was identified on the overhead distribution system and mitigated. The voltage was detected on the ground wire. The cause was a primary wire in contact with the ground wire.

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<sup>6</sup> Section 1(f) of the Safety Standards defines a Finding as “[a]ny confirmed voltage reading on an electric facility or streetlight greater than or equal to 1 volt measured using a volt meter and 500 ohm shunt resistor.” Section 1(c) defines Stray Voltage as “[v]oltage 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.”

O&R analyzed the testing results of 2008 through 2013 and determined that the predominant cause of stray voltage findings was insufficient bonding on ground and guy wires. As a result, O&R has enhanced its quality assurance and control measures by increasing the number of field audits to verify that the system is built to engineering standards. In addition, O&R has provided training to its construction crews targeting the specifications related to bonding.

In accordance with the Safety Standards, when a finding was discovered on the electric facility during stray voltage testing, the Company stray voltage tested all publicly accessible structures and sidewalks within a minimum 30 foot radius of the electric facility. Regarding the one stray voltage finding referred to above, the Company identified no near-by structures with voltage.

**IX. Inspections Results and Analysis**

Of the 170,648 electrical structures that comprise O&R’s T&D system, 43,846 structures were inspected during 2013. The charts below summarize the results of these inspections.

**Overhead Distribution Structures**

*Table of Locations with Deficiencies*

<b>Locations Inspected</b>	<b>Locations w/ Deficiencies</b>	<b>% Locations w/ Deficiencies</b>
27,063	6,158	23%

***Breakdown of Deficiencies***

<b>Priority Rating</b>	<b>Number of Deficiencies</b>	<b>% Deficiencies Found</b>
1	13	0.17%
2	286	4%
3	1,491	19%
4	5,898	77%
Total	7,688	100%

**Overhead Transmission Structures**

*Table of Locations with Deficiencies*

<b>Locations Inspected</b>	<b>Locations w/ Deficiencies</b>	<b>% Locations w/ Deficiencies</b>
6,672	1,947	29%

***Breakdown of Deficiencies***

<b>Priority Rating</b>	<b>Number of Deficiencies</b>	<b>% Deficiencies Found</b>
1	0	0%
2	7	0.3%
3	201	8%
4	2,199	91%
Total	2,407	100%

**Underground Facilities**

***Table of Locations with Deficiencies***

<b>Locations Inspected</b>	<b>Locations w/ Deficiencies</b>	<b>% Locations w/ Deficiencies</b>
9,459	316	3%

***Breakdown of Deficiencies***

<b>Priority Rating</b>	<b>Number of Deficiencies</b>	<b>% Deficiencies Found</b>
1	182	53%
2	27	8%
3	126	37%
4	6	2%
Total	341	100%

**Pad-mount Transformers**

***Table of Locations with Deficiencies***

<b>Locations Inspected</b>	<b>Locations w/ Deficiencies</b>	<b>% Locations w/ Deficiencies</b>
289	5	2%

***Breakdown of Deficiencies***

<b>Priority Rating</b>	<b>Number of Deficiencies</b>	<b>% Deficiencies Found</b>
1	2	40%
2	0	0%
3	0	0%
4	3	60%
Total	5	100%

**Streetlights**

***Table of Locations with Deficiencies***

<b>Locations Inspected</b>	<b>Locations w/ Deficiencies</b>	<b>% Locations w/ Deficiencies</b>
363	0	0%

***Breakdown of Deficiencies***

<b>Priority Rating</b>	<b>Number of Deficiencies</b>	<b>% Deficiencies Found</b>
1	0	0%
2	0	0%
3	0	0%
4	0	0%
Total	0	0%

➤ Priority 1 Conditions

In 2013, O&R visually inspected 43,846 structures and identified 197 Priority 1 conditions. The 13 Priority 1 conditions identified on the overhead distribution system were broken ties on primary wires, blown lightning arrestors and cracked insulators. The 184 Priority 1 conditions identified on the underground distribution system were primarily hand holes with damaged covers, pad mount transformers off their base and structures with corroded exteriors or damaged locking equipment. No Priority 1 conditions were identified on the Company's transmission system.

➤ Priority 2 Conditions

In 2013, 320 Priority 2 conditions were identified on the T&D system. There were 7 Priority 2 conditions identified on the transmission system and 313 on the distribution system. The majority of the Priority 2 conditions on the transmission system were woodpecker holes and insect damage. The majority of the Priority 2 conditions on the overhead distribution system are rungs on poles located below 8'-0" and the remaining conditions are tree trimming issues and cracked cross arms. The majority of the Priority 2 conditions on the underground distribution system are damaged covers.

➤ Priority 3 Conditions

In 2013, 1,818 Priority 3 conditions were identified on the T&D system. There were 201 defects identified on the transmission system and 1,617 defects identified on the distribution system. The majority of the Priority 3 conditions on the transmission system are woodpecker and insect damage. The remaining conditions are grounding conditions, anchors/guy wire conditions and cross arm conditions. Of the 1,617 Priority 3 conditions identified on the overhead distribution system the majority are anchors and guy wire conditions, grounding conditions, conductor conditions, broken tie wires and tree trimming issues. The majority of the Priority 3 conditions on the underground distribution system are damaged covers.

In an effort to reduce the Priority 2 and Priority 3 conditions, O&R continues to review and revise its construction standards and specifications. O&R continuously seeks methods to improve quality assurance and control so that new construction is built to specification and National Electrical Safety Code compliance. O&R's future distribution line upgrades, capital improvements and defective pole replacement program should result in a reduction in the number of Priority 2 and Priority 3 conditions during future inspection cycles.

**X. Quality Assurance and Quality Control**

O&R's Quality Assurance and Compliance Department is responsible for the implementation of the Company's Electric Quality Assurance Program ("Electric QA Program"). In addition to verifying compliance with the requirements of the Safety Standards, the Company's Electric QA Program is designed to promote the health and

safety of the public, the reliable and economical operation of the Company's electric system, compliance with applicable electric codes and regulations, and utilization of Company resources in an efficient manner.

The O&R Electric QA Program also includes a Corrective Action Documentation and Trending procedure.<sup>7</sup> The purpose of this procedure is to define the process by which Quality Assurance and Compliance maintains a corrective action database and trends discrepancies identified by the Electric QA Program. O&R personnel implementing the Electric QA Program are independent from the Electric Operations and Electric Engineering Groups and the Company personnel responsible for the implementation of the Stray Voltage Testing and Visual Inspection Programs.

Quality Assurance ("QA") personnel conducted a review of the Stray Voltage Testing and Visual Inspection programs during 2013. QA performed stray voltage testing and visual inspection on a selective sample of previously tested and inspected Company and municipal streetlights, overhead and underground distribution facilities and transmission structures to verify testing and inspection of equipment and the accuracy of data and records. QA conducted announced and unannounced field observations of field personnel to verify that tests were performed on all required structures. QA found the testing and inspections effectively performed and producing results consistent with the Electric QA Programs' objectives.

#### 2013 Quality Assurance and Quality Control Results

The Company's Electric QA Program selectively sampled and retested 549 distribution and overhead transmission structures. This statistically significant sample size exceeds the 500 units required by the latest version of ANSI Z1.4 (MIL-STD-105D) for the determination of a normal sample size for a unit population of 35,001 to 150,000. The sample selection was distributed across the various structure types.

#### *549 Structures Sampled*

<b>Category</b>	<b>Number of Structures Sampled</b>	<b>Percentage of Sample Size</b>
Overhead Distribution	185	34%
Underground Distribution	58	11%
Street Lights/Traffic Signals	210	38%
Substation Fences	14	2%
Overhead Transmission	82	15%
Total	549	100%

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<sup>7</sup> Details on the O&R Electric QA Program and the Corrective Action Documentation were included with the Company's February 18, 2005 filing with the Commission in Case 04-M-0159.

Of the 549 structures selected, QA identified no stray voltage conditions during retesting and the re-inspections verified the visual inspection results reported by the contractor.

## **XI. Other Pertinent Information**

### ➤ Reports from the Public

As set forth in Appendix 3 to this Report, during 2013, O&R received 11 reports from customers regarding a stray voltage or shock hazard. In compliance with the Safety Standards, O&R responded, investigated and mitigated positive findings of shock incidents reported by the public.

Of the 11 incidents that were reported to O&R, 8 cases were substantiated and 3 incidents proved to be unsubstantiated. Of the 8 substantiated cases, 3 were attributable to O&R system equipment and 5 were due to non-Company equipment.

The 3 cases attributable to O&R were on the overhead system. One defect pertained to a street light service wire, 1 pertained to a failed lightening arrester and the third pertained to a faulty service neutral wire. The 5 cases attributable to other parties were a result of faulty customer-owned equipment/wiring.

### ➤ Stray Voltage Initiatives

O&R has worked and communicated with the Department of Public Service Staff on issues attendant with the implementation of the Safety Standards. O&R continues to participate in joint meetings with the other New York utilities and Department of Public Service Staff to seek best practices, employ lessons learned, and promote a high degree of consistency in the implementation of the Safety Standards requirements.

### ➤ Temporary Repairs

In accordance with the Safety Standards, when a temporary repair is located during inspection or performed by the Company, the Company exercised its best efforts to make a permanent repair of the facility within 90 days. Temporary repairs that remain on the system for more than 90 days are generally due to extraordinary circumstances, e.g., storms that require extensive repair activity, equipment outage not available, or customer work required. The Company has completed all temporary repairs identified during the 2013 inspection cycle. Therefore, there are no exceptions to be reported.

**Appendix 1**

**Stray Voltage Testing Summary**

<b>Orange &amp; Rockland Utilities, Inc. Data as of 12/31/13</b>	<b>Total System Units Requiring Testing</b>	<b>Units Completed</b>	<b>Percent Completed</b>	<b>Units with Voltage Found (&gt;= 1.0v)</b>	<b>Percent of Units Tested with Voltage (&gt;= 1.0v )</b>	<b>*Units Classified as Inaccessible</b>
<b>Overhead Distribution Facilities</b>	33,893	33,893	100.00%	1	0.003%	0
<b>**Underground Distribution Facilities</b>	3,687	3,687	100.00%	0	0.00%	0
<b>Street Lights / Traffic Signals</b>	2,523	2,523	100.00%	0	0.00%	21
<b>***Substation Fences</b>	0	0	0.00%	0	0.00%	0
<b>***Transmission Facilities</b>	0	0	0.00%	0	0.00%	0
<b>TOTAL</b>	40,103	40,103	100.00%	1	0.003%	21

\* Structures classified as inaccessible are defined on page 5, of this Report.

\*\*The majority of the underground structures scheduled to be inspected were fiberglass hand holes that do not require stray voltage testing.

\*\*\* Substation fences and transmission structures were stray voltage tested in 2012. As per the Safety Standards, stray voltage testing is required to be performed again in 2017.



**Appendix 2**

**Summary of Energized Objects**

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

\*Due to a failed lightening arrester and primary tap, the primary wire was in contact with the ground wire. Inspector and crew were advised not to take voltage readings for safety purposes. The cause was a failed lightening arrester.

### Appendix 3

#### Summary of Shock Reports from the Public

<b>Orange and Rockland Utilities, Inc. January 1, 2013 – December 31, 2013</b>	<b>Quarterly Update</b>	<b>Yearly Total</b>
<b>I. Total Shock calls received:</b>	<b>4</b>	<b>11</b>
Unsubstantiated	0	3
Normally Energized Equipment	4	8
<b>Stray Voltage:</b>	<b>4</b>	<b>8</b>
<b>Utility Responsibility (Total)</b>	<b>2</b>	<b>3</b>
Person	2	2
Animal	0	1
<b>Customer Responsibility (Total)</b>	<b>2</b>	<b>5</b>
Person	2	5
Animal	0	0
<b>Other Utility/Gov't Agency (Total)</b>	<b>0</b>	<b>0</b>
Person	0	0
Animal	0	0
<b>II. Injuries Sustained/Medical Attention Received</b>	<b>0</b>	<b>0</b>
Person	0	0
Animal	0	0
<b>III. Voltage Source: Stray Voltage Total</b>	<b>4</b>	<b>8</b>
<b>Utility Responsibility (Total)</b>	<b>2</b>	<b>3</b>
Issue with primary, joint, or transformer	0	0
Secondary joint (Crab)	0	0
SL service Line	0	1
Abandoned SL service line	0	0
Defective service line	0	0
Abandoned service line	0	0
OH Secondary	0	0
OH Service	0	0
OH Service neutral	1	1
Pole	0	0
Riser	0	0
Other	1	1
<b>Customer Responsibility (Total)</b>	<b>2</b>	<b>5</b>
Contractor damage	0	0
Customer equipment/wiring	2	5
<b>Other Utility/Gov't Agency (Total)</b>	<b>0</b>	<b>0</b>
SL Base Connection	0	0
SL Internal wiring or light fixture	0	0
Overhead equipment	0	0
<b>IV. Voltage Range</b>	<b>4</b>	<b>8</b>
1.0V to 4.4V	0	1
4.5V to 24.9V	0	0
25V and above	0	0
No Reading	4	7

**Appendix 4**

**Distribution**

<b>Orange and Rockland Utilities, Inc.</b>															
<b>Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Distribution</b>															
<b>As of 12/31/13</b>															
<b>Overhead Facilities</b>	<b>2009</b>			<b>2010</b>			<b>2011</b>			<b>2012</b>			<b>2013</b>		
<b>Priority Level</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>
<b>Repair Expected</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>
<b>Poles</b>															
<b>Pole Condition</b>															
Number of Deficiencies	7	531	1	-	527	-	-	155	-	-	863	-	-	256	-
Repaired in Time Frame	7	284	1		510			155			745			185	
Repaired - Overdue		247			17						39				
Not Repaired - Not Due														71	
Not Repaired - Overdue											79				
<b>Grounding System</b>															
Number of Deficiencies	-	-	165	-	-	133	-	-	250	-	-	81	-	-	145
Repaired in Time Frame			134			133			230			36			83
Repaired - Overdue			31												
Not Repaired - Not Due								20				45			62
Not Repaired - Overdue															

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Distribution															
As of 12/31/13	2009			2010			2011			2012			2013		
Overhead Facilities	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Priority Level	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Poles</b>															
<b>Anchors/Guy Wires</b>															
Number of Deficiencies	-	3	6,674	-	-	1,664	-	-	99	-	-	179	-	-	1,249
Repaired in Time Frame		2	6,559			1,383			90			150			15
Repaired - Overdue		1	115			281									0
Not Repaired - Not Due									9			29			1,234
Not Repaired - Overdue															
<b>Cross Arm/Bracing</b>															
Number of Deficiencies	2	3	-	1	20	21	-	2	6	-	6	1	-	2	-
Repaired in Time Frame	2	3		1	20	10		2	6		2	1		2	
Repaired - Overdue						11									
Not Repaired - Not Due															
Not Repaired - Overdue											4				
<b>Riser</b>															
Number of Deficiencies	-	-	2	-	-	3	-	-	-	-	-	-	-	-	2
Repaired in Time Frame			2			3									
Repaired - Overdue															
Not Repaired - Not Due															2
Not Repaired - Overdue															

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Distribution															
As of 12/31/13	2009			2010			2011			2012			2013		
Overhead Facilities	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Priority Level	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Conductors</b>															
<b>Primary Wire/Broken Ties</b>															
Number of Deficiencies	6	4	32	10	21	96	-	-	26	-	-	36	5	-	75
Repaired in Time Frame	6	4	24	4	21	47			24			27	3		17
Repaired - Overdue			8	6		49							2		
Not Repaired - Not Due									2			9			58
Not Repaired - Overdue															
<b>Secondary Wire</b>															
Number of Deficiencies	4	-	-	-	-	7	-	-	-	-	1	13	-	1	8
Repaired in Time Frame	4					5					1				
Repaired - Overdue						2									
Not Repaired - Not Due												13		1	8
Not Repaired - Overdue															

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Distribution															
As of 12/31/13															
Overhead Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Conductors</b>															
<b>Neutral</b>															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-
Repaired in Time Frame														1	
Repaired - Overdue															
Not Repaired - Not Due														1	
Not Repaired - Overdue															
<b>Insulators</b>															
Number of Deficiencies	-	-	-	-	1	4	-	-	4	-	-	-	2	-	-
Repaired in Time Frame					1	1			4				2		
Repaired - Overdue						3									
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Pole Equipment</b>															
<b>Transformers</b>															
Number of Deficiencies	1	-	-	1	-	-	3	-	-	5	-	-	-	-	-
Repaired in Time Frame	1			1			3			5					
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Distribution															
As of 12/31/13															
Overhead Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Pole Equipment</b>															
<b>Cutouts</b>															
Number of Deficiencies	-	5	-	-	-	-	-	-	-	-	-	-	1	-	-
Repaired in Timeframe		5											1		
Repaired – Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Lightning Arrestors</b>															
Number of Deficiencies	1	10	14	-	-	18	-	-	2	-	-	-	4	-	-
Repaired in Time Frame			9			9			2				3		
Repaired - Overdue	1	10	5			9							1		
Not Repaired - Not Due															
Not Repaired - Overdue															

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Distribution															
As of 12/31/13															
Overhead Facilities		2009			2010			2011			2012			2013	
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Pole Equipment</b>															
<b>Other Equipment</b>															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															



Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Distribution															
As of 12/31/13															
Overhead Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Miscellaneous</b>															
<b>Trimming Related</b>															
Number of Deficiencies	3	67	11	-	100	11	-	18	22	-	7	20	1	25	12
Repaired in Time Frame	3	46	10		99	11		18	7		6		1	11	1
Repaired - Overdue		21	1		1										
Not Repaired - Not Due									15		1	20		14	11
Not Repaired - Overdue															
<b>Other</b>															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Distribution															
As of 12/31/13															
Overhead Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
Overhead Facilities Total															
Total															
Number of Deficiencies	24	623	6,899	12	669	1,957	3	175	409	5	877	330	13	286	1,491
Repaired in Time Frame	23	344	6,739	6	651	1,602	3	175	363	5	754	214	10	199	116
Repaired - Overdue	1	279	160	6	18	355					39		3		
Not Repaired - Not Due									46		1	116		87	1,375
<sup>8</sup> Not Repaired - Overdue									-		83				

<sup>8</sup> The majority of the overdue 2012 defects required field verification prior to scheduling the work. The repairs are scheduled to be completed in 2014.

# Transmission

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Transmission															
As of 12/31/13															
Transmission Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Towers / Poles</b>															
<b>Steel Towers</b>															
Number of Deficiencies	-	-	56	-	-	33	-	-	3	-	-	-	-	-	1
Repaired in Time Frame			20												
Repaired - Overdue															
Not Repaired - Not Due			0						3						1
Not Repaired - Overdue			36			33									
<b>Poles</b>															
Number of Deficiencies	-	83	1,977	-	21	831	-	2	155	-	-	51	-	6	148
Repaired in Time Frame		22	1,161		5	261		2	52			9		1	
Repaired - Overdue		52	200		12	18									
Not Repaired - Not Due									103			42		5	148
Not Repaired - Overdue		9	616		4	552									

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Transmission															
As of 12/31/13															
Transmission Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Towers / Poles</b>															
<b>Anchors/Guy Wire</b>															
Number of Deficiencies	-	-	23	-	-	5	-	-	10	-	-	2	-	-	2
Repaired in Time Frame			14			5			7			1			
Repaired - Overdue			3												
Not Repaired - Not Due									3			1			2
Not Repaired - Overdue			6												
<b>Cross Arm/Brace</b>															
Number of Deficiencies	-	9	369	-	1	42	-	1	14	-	-	4	-	1	7
Repaired in Time Frame		2	150		1	19		1	5			1			
Repaired - Overdue		5	41			3									
Not Repaired - Not Due									9			3		1	7
Not Repaired - Overdue		2	178			20									
<b>Grounding System</b>															
Number of Deficiencies	-	7	24	-	2	27	-	-	25	-	-	18	-	-	23
Repaired in Time Frame			12		1	11			14			6			2
Repaired - Overdue		6	3		1	4									
Not Repaired - Not Due									11			12			21
Not Repaired - Overdue		1	9			12									

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Transmission															
As of 12/31/13															
Transmission Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Conductors</b>															
<b>Cable</b>															
Number of Deficiencies	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-
Repaired in Time Frame						2									
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Static/Neutral</b>															
Number of Deficiencies	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame		1													
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Transmission															
As of 12/31/13															
Transmission Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Conductors</b>															
<b>Insulators</b>															
Number of Deficiencies	-	3	31	-	-	10	-	-	1	-	-	3	-	-	2
Repaired in Time Frame		3	9			1						1			
Repaired - Overdue			3												
Not Repaired - Not Due									1			2			2
Not Repaired - Overdue			19			9									
<b>Miscellaneous</b>															
<b>Right of Way Condition</b>															
Number of Deficiencies	-	8	423	-	-	127	-	-	44	-	-	4	-	-	18
Repaired in Time Frame		3	332			91			6						
Repaired - Overdue		5													
Not Repaired - Not Due									38			4			18
Not Repaired - Overdue			91			36									
<b>Other</b>															
Number of Deficiencies	3	-	1	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue	3														
Not Repaired - Not Due															
Not Repaired - Overdue			1												

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Transmission															
As of 12/31/13															
Transmission Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Transmission Facilities Total</b>															
<b>Total</b>															
Number of Deficiencies	3	111	2,904	-	24	1,077	-	3	252	-	-	82	-	7	201
Repaired in Time Frame		31	1,698		7	390		3	84			18		1	2
Repaired - Overdue	3	68	250		13	25									
Not Repaired - Not Due									168			64		6	199
<sup>9</sup> Not Repaired - Overdue		12	956		4	662									

<sup>9</sup> The majority of the overdue repairs were due to the unavailability to obtain system outages that would not impact on reliability and capital projects.

# Underground

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Underground															
As of 12/31/13															
Underground Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Underground Structures</b>															
<b>Damaged Cover</b>															
Number of Deficiencies	18	4	1	-	-	-	-	-	7	3	3	6	66	27	126
Repaired in Time Frame	18	4	1						1	3	3	3	65	22	51
Repaired - Overdue													1		
Not Repaired - Not Due									6			3		5	75
Not Repaired - Overdue															
<b>Damaged Structure</b>															
Number of Deficiencies	3	4	1	-	-	-	-	-	-	4	-	-	116	-	-
Repaired in Time Frame	3	4	1							4			116		
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															



Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Underground															
As of 12/31/13															
Underground Facilities	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Underground Structures</b>															
<b>Congested Structure</b>															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Damaged Equipment</b>															
Number of Deficiencies	-	-	-	-	-	-	23	-	-	3	-	-	-	-	-
Repaired in Time Frame							23			3					
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															

**Orange and Rockland Utilities, Inc.**

**Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Underground**

<b>As of 12/31/13</b>															
<b>Underground Facilities</b>	<b>2009</b>			<b>2010</b>			<b>2011</b>			<b>2012</b>			<b>2013</b>		
<b>Priority Level</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>
<b>Repair Expected</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>
<b>Conductors</b>															
<b>Primary Cable</b>															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Secondary Cable</b>															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Neutral Cable</b>															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															

**Orange and Rockland Utilities, Inc.**

**Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Underground**

<b>As of 12/31/13</b>															
<b>Underground Facilities</b>	<b>2009</b>			<b>2010</b>			<b>2011</b>			<b>2012</b>			<b>2013</b>		
<b>Priority Level</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>
<b>Repair Expected</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>
<b>Conductors</b>															
<b>Racking Needed</b>															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Miscellaneous</b>															
<b>Other</b>															
Number of Deficiencies	-	2	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame		2													
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Underground Facilities Total</b>															
<b>Total</b>															
Number of Deficiencies	21	10	2	-	-	-	23	-	7	10	3	6	182	27	126
Repaired in Time Frame	21	10	2				23		1	10	3	3	181	22	51
Repaired - Overdue													1		
Not Repaired - Not Due									6			3		5	75
Not Repaired - Overdue															

# Pad Mount Transformers

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Pad Mount Transformers															
As of 12/31/13															
Pad Mount Transformers	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Pad Mount Transformers</b>															
<b>Damaged Structure</b>															
Number of Deficiencies	60	-	-	20	-	-	2	1	-	14	-	-	1	-	-
Repaired in Time Frame	60			20			2	1		14			1		
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Damaged Equipment</b>															
Number of Deficiencies	1	-	-	3	1	-	-	-	-	12	-	-	1	-	-
Repaired in Time Frame	1			3	1					12			1		
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Pad Mount Transformers															
As of 12/31/13															
Pad Mount Transformers	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Pad Mount Transformers</b>															
<b>Cable Condition</b>															
Number of Deficiencies	-	3	-	-	-	-	3	-	-	5	-	-	-	-	-
Repaired in Time Frame		3					3			5					
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Oil Leak</b>															
Number of Deficiencies	3	-	-	-	-	-	26	-	-	71	-	-	-	-	-
Repaired in Time Frame	3						26			71					
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Pad Mount Transformers															
As of 12/31/13															
Pad Mount Transformers	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Pad Mount Transformers</b>															
<b>Off Pad</b>															
Number of Deficiencies	67	-	-	23	-	-	11	-	-	42	-	-	-	-	-
Repaired in Time Frame	67			23			11			42					
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Lock/Latch/Pen</b>															
Number of Deficiencies	12	-	3	3	-	2	3	3	-	44	-	1	-	-	-
Repaired in Time Frame	12		3	3		2	3	3		44		1			
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Pad Mount Transformers															
As of 12/31/13	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
<b>Miscellaneous</b>															
<b>Other</b>															
Number of Deficiencies	-	-	20												
Repaired in Time Frame			20												
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Pad Mount Transformer Total</b>															
<b>Total</b>															
Number of Deficiencies	143	3	23	49	1	2	45	4	-	188	-	1	2	-	-
Repaired in Time Frame	143	3	23	49	1	2	45	4		188		1	2		
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															

# Street Lights

Orange and Rockland Utilities, Inc.															
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Streetlights															
As of 12/31/13															
Streetlights	2009			2010			2011			2012			2013		
Priority Level	I	II	III	I	II	III	I	II	III	I	II	III	I	II	III
Repair Expected	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years	Within 1 week	Within 1 year	Within 3 years
Street Light															
Base/Light															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
Handhole/Box															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
Service Internal Wiring															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															



**Orange and Rockland Utilities, Inc.**

**Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Streetlights**

<b>As of 12/31/13</b>															
<b>Streetlights</b>	<b>2009</b>			<b>2010</b>			<b>2011</b>			<b>2012</b>			<b>2013</b>		
<b>Priority Level</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>	<b>I</b>	<b>II</b>	<b>III</b>
<b>Repair Expected</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>	<b>Within 1 week</b>	<b>Within 1 year</b>	<b>Within 3 years</b>
<b>Street Light</b>															
<b>Access Cover</b>															
Number of Deficiencies	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue			2												
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Miscellaneous</b>															
<b>Other</b>															
Number of Deficiencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue															
Not Repaired - Not Due															
Not Repaired - Overdue															
<b>Street Light Total</b>															
<b>Total</b>															
Number of Deficiencies	-	-	2	-	-	-	-	-	-	-	-	-	-	-	-
Repaired in Time Frame															
Repaired - Overdue			2												
Not Repaired - Not Due															
Not Repaired - Overdue															

## Level IV Conditions

Orange and Rockland Utilities, Inc.										
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process – Level IV Conditions										
As of 12/31/13										
Level IV Conditions	2009	2009	2010	2010	2011	2011	2012	2012	2013	2013
	Number of Conditions Found	Number of Conditions Repaired	Number of Conditions Found	Number of Conditions Repaired	Number of Conditions Found	Number of Conditions Repaired	Number of Conditions Found	Number of Conditions Repaired	Number of Conditions Found	Number of Conditions Repaired
<b>Overhead Facilities</b>										
<b>Pole Condition</b>	<b>6,995</b>	<b>5,964</b>	<b>13,481</b>	<b>962</b>	<b>3,194</b>	<b>598</b>	<b>7,078</b>	<b>320</b>	<b>5,877</b>	<b>137</b>
Pole Condition	768	568	2,842	130	362	21	1,166	23	980	6
Grounding System	2,207	1,982	3,621	312	1,693	447	2,118	114	2,719	67
Anchors/Guy Wire	4,020	3,414	7,017	520	1,139	130	3,794	183	2,178	64
Cross Arm/Bracing			1							
Riser										
<b>Conductors</b>	<b>-</b>	<b>-</b>	<b>1</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Primary Wire/Broken Ties										
Secondary Wire										
Neutral			1							
Insulators										
<b>Pole Equip</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Transformers										
Cutouts										
Lightning Arrestors										
Other Equipment										
<b>Miscellaneous</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
Trimming Related										
Other										
<b>Overhead Facilities Total</b>	<b>6,995</b>	<b>5,964</b>	<b>13,482</b>	<b>962</b>	<b>3,194</b>	<b>598</b>	<b>7,078</b>	<b>320</b>	<b>5,877</b>	<b>137</b>

**Orange and Rockland Utilities, Inc.**

**Summary of Deficiencies and Repair Activity Resulting from the Inspection Process –  
Level IV Conditions**

<b>As of 12/31/13</b>											
<b>Level IV Conditions</b>	<b>2009</b>	<b>2009</b>	<b>2010</b>	<b>2010</b>	<b>2011</b>	<b>2011</b>	<b>2012</b>	<b>2012</b>	<b>2013</b>	<b>2013</b>	
	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	
<b>Transmission Facilities</b>											
<b>Towers/Poles</b>	<b>214</b>	<b>56</b>	<b>1,017</b>	<b>57</b>	<b>2,437</b>	<b>61</b>	<b>2,240</b>	<b>50</b>	<b>1,888</b>	<b>188</b>	
Steel Towers	144	33	189	15	404		178		228		
Poles	70	23	828	42	2,033	61	2,062	50	1,660	188	
Grounding System											
Anchors/Guy Wire											
Crossarm/Brace											
<b>Conductors</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
Cable											
Static/Neutral											
Insulators											
<b>Miscellaneous</b>	<b>18</b>	<b>21</b>	<b>253</b>	<b>12</b>	<b>866</b>	<b>32</b>	<b>81</b>	<b>34</b>	<b>311</b>	<b>-</b>	
Right of Way Condition			13		84		81	1	311		
Other	18	21	240	12	782	32		33			
<b>Transmission Facilities Total</b>	<b>232</b>	<b>77</b>	<b>1,270</b>	<b>69</b>	<b>3,303</b>	<b>93</b>	<b>2,321</b>	<b>84</b>	<b>2,199</b>	<b>188</b>	

**Orange and Rockland Utilities, Inc.**

**Summary of Deficiencies and Repair Activity Resulting from the Inspection Process - Level IV Conditions**

<b>As of 12/31/13</b>										
<b>Level IV Conditions</b>	<b>2009</b>	<b>2009</b>	<b>2010</b>	<b>2010</b>	<b>2011</b>	<b>2011</b>	<b>2012</b>	<b>2012</b>	<b>2013</b>	<b>2013</b>
	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>
<b>Underground Structures</b>										
<b>Underground Structures</b>	2	-	2	-	-	-	-	-	1	-
Damaged Cover										
Damaged Structure	2		2						1	
Congested Structure										
Damaged Equipment										
<b>Conductors</b>	2	-	-	-	-	-	-	-	-	-
Primary Cables										
Secondary Cable										
Neutral Cable										
Racking Needed	2									
<b>Miscellaneous</b>	2	-	-	-	-	-	1	-	5	-
Other	2						1		5	
<b>Underground Structures Total</b>	6	-	2	-	-	-	1	-	6	-
<b>Pad Mount Transformers</b>										
<b>Pad Mount Transformers</b>	55	-	42	-	12	-	29	-	3	-
Damaged Structure	55		42		12		29		3	
Damaged Equipment										
Cable Condition										
Oil Leak										
Off Pad										
Lock/Latch/Penta										
<b>Miscellaneous</b>	-	-	-	-	-	-	-	-	-	-
Other										
<b>Pad Mount Transformer Total</b>	55	-	42	-	12	-	29	-	3	-

**Orange and Rockland Utilities, Inc.**

**Summary of Deficiencies and Repair Activity Resulting from the Inspection Process -  
Level IV Conditions**

<b>As of 12/31/13</b>										
<b>Level IV Conditions</b>	<b>2009</b>	<b>2009</b>	<b>2010</b>	<b>2010</b>	<b>2011</b>	<b>2011</b>	<b>2012</b>	<b>2012</b>	<b>2013</b>	<b>2013</b>
	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>	<b>Number of Conditions Found</b>	<b>Number of Conditions Repaired</b>
<b>Streetlights</b>										
<b>Street Light</b>	-	-	-	-	-	-	-	-	-	-
Base/Standard/Light										
Handhole/Service Box										
Service/Internal Wiring										
Access Cover										
<b>Miscellaneous</b>	-	-	-	-	-	-	-	-	-	-
Other										
<b>Street Light Total</b>	-	-	-	-	-	-	-	-	-	-
<b>Total Level IV Conditions</b>										
<b>Overall Total</b>	<b>7,288</b>	<b>6,041</b>	<b>14,796</b>	<b>1,031</b>	<b>6,509</b>	<b>691</b>	<b>9,429</b>	<b>404</b>	<b>8,085</b>	<b>325</b>

## Summary

Orange and Rockland Utilities, Inc.							
Summary of Deficiencies and Repair Activity Resulting from the Inspection Process							
As of 12/31/13							
Year	Priority Level /Repair Expected		Deficiencies Found (Total)	Repaired In Time Frame	Repaired - Overdue	Not Repaired - Not Due	Not Repaired - Overdue
2009	I	Within 1 week	191	187	4	-	-
	II	Within 1 year	749	390	347	-	12
	III	Within 3 years	9,830	8,462	412		956
	IV	N/A	7,288	-	-	-	-
2010	I	Within 1 week	61	55	6	-	-
	II	Within 1 year	694	659	31	-	4
	III	Within 3 years	3,036	1,994	380	-	662
	IV	N/A	14,796	-	-	-	-
2011	I	Within 1 week	71	71	-	-	-
	II	Within 1 year	182	182	-	-	-
	III	Within 3 years	668	448	-	220	-
	IV	N/A	6,509	-			
2012	I	Within 1 week	203	203	-	-	-
	II	Within 1 year	880	757	39	1	83
	III	Within 3 years	419	236	-	183	-
	IV	N/A	9,429	-	-	-	-
2013	I	Within 1 week	197	193	4	-	-
	II	Within 1 year	320	222	-	98	-
	III	Within 3 years	1,818	169	-	1,649	-
	IV	N/A	8,085	-	-	-	-

*Note: All 2009 and 2010 distribution system repairs have been completed. The remaining conditions are transmission defects and will be completed when system outages can be obtained without negatively impacting reliability and capital projects.*

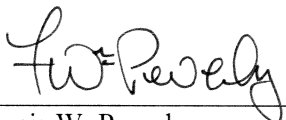
**Exhibit 1**

**CERTIFICATION**  
**STRAY VOLTAGE TESTING**

STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF ROCKLAND                )

Francis W. Peverly, on this 28<sup>th</sup> day of January 2014, certifies as follows:

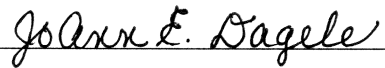
1. I am the Vice President, Operations of Orange and Rockland Utilities, Inc. (“the Company”), and in that capacity, I make this Certification for the annual period ending December 31, 2013 (“annual period”) based on my knowledge of the testing program adopted by the Company in accordance with the Public Service Commission’s Orders issued and effective January 5, 2005, July 21, 2005, December 15, 2008 and March 22, 2013 in Case 04-M-0159 (collectively the “Orders”), including the Quality Assurance Program filed by the Company with the Commission.
2. In accordance with the requirements of the Orders, the Company developed a program designed to test (i) all publicly accessible metallic street light and traffic signal poles located in public thoroughfares in the Company’s service territory (“Street Lights”), and (ii) publicly accessible electric facilities owned by the Company (“Facilities”) in conjunction with the facility five year inspections, as identified through a good faith effort by the Company, for stray voltage (“Stray Voltage Testing Program”).
3. I hereby certify that, to the best of my knowledge, information and belief, the Company has implemented and completed its Stray Voltage Testing Program for the annual period. The Company is unaware of any Facilities or Street Lights that were not tested, or deemed inaccessible, during the annual period.
4. I make this certification subject to the condition and acknowledgment that it is reasonably possible that, notwithstanding the Company’s good faith implementation and completion of the Stray Voltage Testing Program, there may be Facilities and Street Lights that, inadvertently, may not have been tested or were not discovered or known after reasonable review of Company records and reasonable visual inspection of the areas of the service territory where Facilities and Street Lights were known to exist or reasonably expected to be found.

  
\_\_\_\_\_  
Francis W. Peverly

Sworn to before me this 28<sup>th</sup> day of January, 2014

Notary Public:

JOANN E. DAGELE  
Notary Public, State of New York  
No. 01DA6005650  
Qualified in Orange County  
Commission Expires 4/20/ 2014

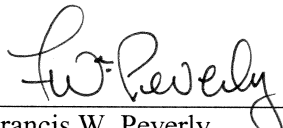
  
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**CERTIFICATION**  
**FACILITY INSPECTIONS**

STATE OF NEW YORK                    )  
  ) ss.:  
COUNTY OF ROCKLAND                )

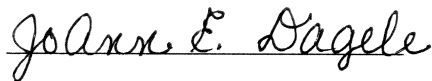
Francis W. Peverly, on this 28<sup>th</sup> day of January 2014, certifies as follows:

1. I am the Vice President, Operations of Orange and Rockland Utilities, Inc. (“the Company”), and in that capacity I make this Certification for the annual period ending December 31, 2013 based on my knowledge of the inspection program adopted by the Company in accordance the Public Service Commission’s Orders issued and effective January 5, 2005, July 21, 2005, December 15, 2008, and March 22, 2013 in Case 04-M-0159 (collectively the “Orders”), including the Quality Assurance Program filed by the Company with the Commission.
2. The Company has an inspection program that is designed to inspect on a five-year inspection cycle all of its electric facilities (“Facilities”), as identified through a good faith effort by the Company, in accordance with the requirements of the Orders (the “Facility Inspection Program”).
3. I hereby certify that, to the best of my knowledge, information and belief, the Company has implemented and completed its Facility Inspection Program to inspect approximately 20 % of its Facilities during calendar year 2013, in order to comply with the five-year inspection cycle required under the Orders.

  
\_\_\_\_\_  
Francis W. Peverly

Sworn to before me this 28<sup>th</sup> day of January, 2014

Notary Public:

  
\_\_\_\_\_  
JoAnn E. Dagele

JOANN E. DAGELE  
Notary Public, State of New York  
No. 01DA6005650  
Qualified in Orange County  
Commission Expires 4/20/ 2014