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**VIA EXPRESS MAIL
AND EMAIL**

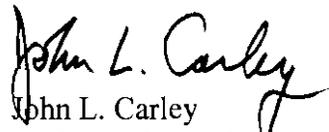
Honorable Jaclyn A. Brillling
Secretary
State of New York
Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

Re: Case 04-M-0159 – Proceeding on Motion of the Commission to
Examine the Safety of Consolidated Edison Company of New
York, Inc.'s Electric Transmission and Distribution Systems

Dear Secretary Brillling:

Pursuant to the Notice Soliciting Comments issued July 8, 2008 in the above-referenced proceeding, I enclose an original and five copies of Orange and Rockland Utilities, Inc.'s ("Orange and Rockland") Company Specific Comments. Orange and Rockland also is a party to the Joint Comments of the New York State Utilities being submitted to the Commission under separate cover letter. Please contact me if you have any questions regarding these comments.

Very truly yours,


John L. Carley
Assistant General Counsel

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EXPRESS MAIL

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

CASE 04-M-0159 – Proceeding on Motion of the Commission to Examine the Safety
of Consolidated Edison Company of New York, Inc.’s Electric
Transmission and Distribution Systems

Orange and Rockland Utilities, Inc.’s Company Specific Comments

I. INTRODUCTION AND INITIAL STATEMENT

On July 8, 2008, the Public Service Commission (“Commission”) issued a Notice Soliciting Comments (“Notice”) in the above-referenced proceeding. The Notice seeks comments on proposed changes to the Commission’s electric system safety standards (“Standards”), as set forth in a proposal presented by the Department of Public Service Staff (“Staff Proposal”), as well as five specific questions and one item on the efficacy of utilizing mobile stray voltage testing technology on a statewide basis. Orange and Rockland Utilities, Inc. (“O&R” or “the Company”) provides its Company-specific responses to the Commission’s questions and comments on the Staff Proposal in this filing.¹

O&R supports the Commission’s adoption of changes to the Standards. The safety of the public and its workers has been, and continues to be, a fundamental objective of O&R’s electric system specifications, work rules, and practices. The Commission’s requirements for periodic testing and inspection of electric facilities are consistent with the Company’s commitment to the safety of the public and its workers.

As the Notice recognizes, implementation of the Standards is a dynamic process that will produce information, experience, and technologies that will warrant periodic review of the Standards to determine the most effective and efficient methods for maintaining electric system safety on an ongoing basis. As such opportunities are identified, O&R will work with Staff to promote this objective.

¹ In addition, the Company joins in the Joint Comments of the New York State Utilities (“Joint Comments”) regarding the Staff Proposal submitted on behalf of O&R, Consolidated Edison Company of New York, Inc., Central Hudson Gas & Electric Corporation, National Grid USA, New York State Electric & Gas Corporation, and Rochester Gas and Electric Corporation. The Joint Comments are specifically adopted by the Company and incorporated herein.

and unnecessary, should the Commission mandate a “zone of protection,” such zone, as defined by the radius from the point of stray voltage, should be no more than 10 feet. A 10 foot radius would allow testing personnel charged to secure and safeguard the area and stay within reasonable reach of the energized structure, while continuing to stray voltage test other possible hazardous structures. Within high trafficked suburban and urban environments, a 10 foot radius would create a “zone of protection” that would meet the Commission’s objective of improving public safety without compromising the objectives of the Standards.

3) Implementing the proposed prioritization system for inspections, which include defined repair guidelines.

O&R does not support this revision as proposed. While O&R understands the Commission’s intent to develop a unified prioritization system throughout the state, each separate utility has its own unique electrical systems. Issues within these different systems vary from utility to utility. While one utility may deem a deficiency to be a low priority, the same deficiency may be a higher priority in another utility’s environment. The proposed prioritization system will ignore individual utility characteristics and thereby risk compromising the safety and reliability of individual utility systems.

However, should the Commission mandate unified reporting and timeframes to complete the repairs, O&R proposes that the guidelines for Level II and Level III repairs be extended to one year and three years, respectively.

Conditions categorized as Level II repairs pose no immediate danger to the general public. Such conditions may require extensive planning and scheduling to implement a permanent repair. The Company should be permitted to organize its work so as to repair Level II conditions as soon as system conditions and manpower permit. Moreover, due to the complexities involved in completing many Level II repairs, the Company proposes that the timeframe to complete a permanent repair be extended to one year.

Level III repairs are by nature a lower priority for the Company to remediate, and pose no immediate danger to the public or to the reliability of the electric system. Due to the number of Level III conditions identified annually, current available resources and other required system maintenance, the Company proposes that the timeframe to complete a permanent repair be extended to three years.

4) Accurately tracking repair activities in response to inspection findings.

O&R generally supports this requirement, however, the Company does not currently have a system in place to track repair activities as required by the proposed changes to the Standards. Therefore, an adjustment period is needed, along with additional resources, for the Company to modify its current operational procedures and inspection and repair system.

deficiencies, utilities should account for the safety and operational effects should the facility fail prior to repair.”

The Company proposes changing the time frames established for Level II and Level III conditions, to one year and three years respectively. This modification is proposed due to the nature of repairs required for these categories.

Conditions categorized as Level II repairs pose no immediate danger to the general public. Such conditions may require extensive planning and scheduling to implement a permanent repair, such as arranging for equipment and pole replacements. These repairs often involve equipment that is not readily available and permitting that may take six months or more to obtain. These repairs also may involve outages, which require careful scheduling in order to avoid a negative impact on reliability.

The Company will make every effort to repair Level II conditions as soon as system conditions and manpower permit. However, due to the complexities involved in completing many Level II repairs, the Company proposes that the timeframe to complete a permanent repair be extended to one year.

The Company proposes to modify the Level III repair timeframe, from two years to three years. Conditions categorized as Level III repairs are by nature a lower priority for the Company to remediate, and pose no immediate danger to the public or to the reliability of the electric system. The Company has reviewed the average number of this category of conditions found per year, and believes that workload, resources and safety considerations warrant that repairs to conditions be completed within three years. Again, this reflects the current availability of resources and other required system maintenance. The Company believes that scheduled survey and maintenance work, such as annual stray voltage testing, transmission line ground patrol inspections, and the Company’s tree trimming programs, would enable detection of any serious conditions, including changes from a Level III condition to a Level II or Level I, necessitating a more immediate repair.