

Analysis of Damages on Gas Corporation Facilities

Instructions and Guidance

Instructions:

- 1) Open the 'Analysis of Damages' tab.
- 2) Click the drop down box and select the respective gas corporation.
- 3) Input the calendar year for which the data is being submitted.
- 4) Click the drop down box and select the respective period for which the data is being submitted.
- 5) Input the name and title of the gas corporation officer submitting this report.
- 6) Input the number (#) of damages and tickets within specific categories and timeframes (white colored cells).
- 7) Provide any comments as necessary. For example, if there be an unexpected spike in the number of damages within a specific category, than further justification for and supporting evidence should be provided.
- 8) Save the file and email it to safety@dps.ny.gov no later than the 30th day of the month following the end of the period (April 30th, July 30th, October 30th, and January 30th).

Guidance:

- Damage due to excavation activities is the leading cause of pipeline failures and accidents. Evaluating the number of damages that occur in relation to the volume of construction and excavation activity in a company's operating territory will provide as a basis for assessing performance.
- Retransmits, or refreshes, are defined as any one-call ticket which has the same requesting party and location of the proposed scope of work. Retransmits, or refreshes, are excluded from the total performance.
- The number of damages includes instances where gas facilities require repair (including coating damage) or replacement due to contact by excavation tools utilized by an excavator (defined in 16 NYCRR 753-1.2(j)) whether mechanical or manual. Also included are damages resulting from the failure of the excavator to provide adequate support and protection for the gas facilities as required under 16 NYCRR 753-3.12.
- One-call tickets requested outside of the company's gas operating territory are excluded from this analysis.
- Coating damages to underground facilities are included in this analysis and should be categorized accordingly.
- Damages shall be categorized by one sub-category only, and not due to multiple causes.
- Unreported damages shall be counted when first discovered by the gas corporation.
- Damages to non active or de-energized pipelines shall be excluded from this analysis. Damages to facilities which are to be replaced but are still active or energized shall be included in this analysis.
- 'Third Party' is a category reserved for any damages were the entity performing the work provided its notice of intent to excavate to the one-call notification system.
- 'Other' is a sub-category for 'Company and Company Contractor' which is reserved for any damages caused by non gas corporation excavators. For example, if an electric or steam corporation operates under the same legal entity as the gas corporation, the damages caused by it would be reflected under this sub-category.
- Reimbursement of damages caused by third party excavators should be pursued. If reimbursement is not pursued, an explanation should be documented and well supported.
- 'Human or Animal' is a sub-category reserved for any party which does not use or have mechanized equipment present for the purpose of movement or removal of earth in or on the ground.
- Interpretations or questions regarding the calculation of or for any circumstances not explicitly addressed in this guidance can be requested by sending an email to safety@dps.ny.gov.

Analysis of Leaks on Gas Corporation Facilities

Instructions and Guidance

Instructions:

- 1) Open the 'Analysis of Leaks' tab.
- 2) Click the drop down box and select the respective gas corporation.
- 3) Input the calendar year for which the data is being submitted.
- 4) Click the drop down box and select the respective period for which the data is being submitted.
- 5) Input the name and title of the gas corporation officer submitting this report.
- 6) Input the number (#) of leaks, miles of main, number of services, or average service length within specific categories and timeframes (white colored cells).
- 7) Provide any comments as necessary. For example, if 'other' is chosen for a material type, than further clarification should be provided as to its specific composition and coating material(s) if applicable.
- 8) Save the file and email it to safety@dps.ny.gov no later than the 30th day of the month following the end of the period (April 30th, July 30th, October 30th, and January 30th).

Guidance:

- The intent in evaluating a gas corporation's leak management program is to gauge performance in reducing the number of leaks that occur, repairing potentially hazardous leaks (Type 1, Type 2A, and Type 2) that are found, reducing the backlog, and providing an indication of susceptibility of certain facilities to leakage.
- 'Leak Type' means Type 1, Type 2A, Type 2, or Type 3 leaks as classified according to 16 NYCRR 255.811 through 16 NYCRR 255.817.
- All leak records shall depict the extent of gas migration, obtaining 0% gas-in-air readings in each direction.
- 'Leak Discovered' means a leak on gas corporation owned or operated facilities that results in a written leak repair order or leak record, excluding leaks caused by third party damage, leak orders re-issued following repair, and duplicate leak records (same location and migration pattern).
- 'Leak Repair' means a leak where physical work to eliminate the leak area has been completed during the reporting period. Included are leak repairs pending follow-up inspection per 16 NYCRR 255.819, and leaks that are closed based on replacement or abandonment of facilities. Excluded are repairs of leaks caused by third party damage, leaks that are closed (or zeroed out) without repair, duplicate leak orders or records, minor valve leaks immediately repaired by lubrication or tightening, and immediate repair of leaks on exposed service piping or facilities.
- 'Leak Backlog' means leaks that are pending repair or scheduled replacement as of the reporting period, including leaks discovered and leak repairs that failed follow-up inspection per 16 NYCRR 255.819.
- Interpretations or questions regarding the calculation of or for any circumstances not explicitly addressed in this guidance can be requested by sending an email to safety@dps.ny.gov.

Analysis of Leaks on Gas Corporation Facilities

Gas Corporation: _____

Calendar Year: _____

Reporting Period: _____

Reporting Officer/Title: _____

Instructions: Input the number (#) of leaks within specific categories and timeframes (white colored cells).

Analysis of Leak Repairs on Mains								
Category	Unprotected and Bare Steel				Unprotected and Coated Steel			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Type 1								
Type 2A								
Type 2								
Type 3								
Totals	0	0	0	0	0	0	0	0
Category	Protected and Bare Steel				Protected and Coated Steel			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Type 1								
Type 2A								
Type 2								
Type 3								
Totals	0	0	0	0	0	0	0	0
Category	Plastic				Cast Iron or Wrought Iron			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Type 1								
Type 2A								
Type 2								
Type 3								
Totals	0	0	0	0	0	0	0	0
Category	Copper				Other			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Type 1								
Type 2A								
Type 2								
Type 3								
Totals	0	0	0	0	0	0	0	0

Comments: _____

Analysis of Leaks on Gas Corporation Facilities

Gas Corporation: _____

Calendar Year: _____

Reporting Period: _____

Reporting Officer/Title: _____

Instructions: Input the number (#) of leaks within specific categories and timeframes (white colored cells).

Analysis of Leak Repairs on Services								
Category	Unprotected and Bare Steel				Unprotected and Coated Steel			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Type 1								
Type 2A								
Type 2								
Type 3								
Totals	0	0	0	0	0	0	0	0
Category	Protected and Bare Steel				Protected and Coated Steel			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Type 1								
Type 2A								
Type 2								
Type 3								
Totals	0	0	0	0	0	0	0	0
Category	Plastic				Cast Iron or Wrought Iron			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Type 1								
Type 2A								
Type 2								
Type 3								
Totals	0	0	0	0	0	0	0	0
Category	Copper				Other			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Type 1								
Type 2A								
Type 2								
Type 3								
Totals	0	0	0	0	0	0	0	0

Comments: _____

Analysis of Leaks on Gas Corporation Facilities

Gas Corporation: _____

Calendar Year: _____

Reporting Period: _____

Reporting Officer/Title: _____

Instructions: Input the number (#) of miles and services within specific categories and timeframes (white colored cells).

Analysis of System Mileage								
Category	Steel				Plastic	Cast and Wrought Iron	Copper	Other
	Unprotected		Protected					
	Bare	Coated	Bare	Coated				
Miles of Main								
Number of Services								
Average Service Length (in Feet)								
Total Miles of Main								
Total Number of Services								
Total System Mileage								

Instructions: Input the number (#) of leaks within specific categories and timeframes (white colored cells).

Analysis of Leak Backlog and Leaks Discovered								
Category	Leak Backlog				Leaks Discovered			
	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
Type 1								
Type 2A								
Type 2								
Type 3								
Totals								

Comments:

Analysis of Response to Emergency Reports

Instructions and Guidance

Instructions:

- 1) Open the 'Analysis of ERTs' tab.
- 2) Click the drop down box and select the respective gas corporation.
- 3) Input the calendar year for which the data is being submitted.
- 4) Click the drop down box and select the respective period for which the data is being submitted.
- 5) Input the name and title of the gas corporation officer submitting this report.
- 6) Input the number of reports (#) responded to within specific categories and timeframes (white colored cells).
- 7) Provide any comments as necessary. For example, if the quarterly totals fail to meet the minimum New York State standards (75% within 30-minutes, 90% within 45-minutes, or 95% within 60-minutes), justification for and supporting evidence should be provided.
- 8) Save the file and email it to safety@dps.ny.gov no later than the 15th day of the month following the end of the period (April 15th, July 15th, October 15th, and January 15th).

Guidance:

- Each gas corporation will continue to provide a monthly analysis of its response to emergency reports as required by 16 NYCRR 255.825(d). This file can be used in conjunction with that submission.
- Response times are measured from the time a report is received by the gas corporation, to the time a qualified company employee arrives at the location. Qualified employees are those who are trained and equipped to investigate gas leak and emergency reports in accordance with accepted company procedures and operator qualifications as prescribed by 16 NYCRR 255.604.
- All reports should be 'clocked' from a synchronized source to provide an accurate response time.
- Responses to states other than New York should be excluded from the totals.
- Reports with identical dates and times (i.e. duplicates) should be excluded from the totals.
- Immediate or 'zero' response times that are discovered by qualified company personnel during normal operations and maintenance activities should be excluded from this reporting.
- Immediate or 'zero' response times may be included in this analysis should a qualified company employee be stopped or 'flagged down' on the street and informed of a gas leak or emergency which is then immediately investigated by that same qualified company employee. Any other immediate or 'zero' response times should be justified as to why it is being included. This justification should be attached to this submission.
- If limitations prevent the precise reporting of these response times, the most conservative approach should be taken by the gas corporation. For example, if the software used to collect data truncates the response times to the nearest minute, all data within this truncation shall be included within the next highest minute. This means that if response times from 30:00 to 30:59 are truncated to 30 minutes, all of this data should be documented as being responded to within 31 minutes.
- All emergency reports, gas, carbon monoxide, and unidentified odors, should be included in the totals regardless of the resultant findings. This means that if the gas corporation investigates an emergency report and determines it to be due to something other than natural gas, it is to be included in the totals.
- Any alterations made by a gas corporation employee to the response times should have justification for and evidence to support why these changes have been made.
- Interpretations or questions regarding the calculation of or for any circumstances not explicitly addressed in this guidance can be requested by sending an email to safety@dps.ny.gov.

Analysis of Response to Emergency Reports

Gas Corporation: _____

Calendar Year: _____

Reporting Period: _____

Reporting Officer/Title: _____

Instructions: Input the number of reports (#) responded to within specific categories and timeframes (white colored cells).

Response Times (Minutes:Seconds)	Weekdays: During Normal Business Hours		Weekdays: After Normal Business Hours		Saturday, Sunday, and Holidays		Totals	
	#	%	#	%	#	%	#	%
0:00 - 15:00		0.00		0.00		0.00	0	0.00
15:01 - 30:00		0.00		0.00		0.00	0	0.00
30:01 - 45:00		0.00		0.00		0.00	0	0.00
45:01 - 60:00		0.00		0.00		0.00	0	0.00
More than 60:01		0.00		0.00		0.00	0	0.00
Totals	0	0.00	0	0.00	0	0.00	0	0.00
Response Times (Minutes)	Weekdays: During Normal Business Hours		Weekdays: After Normal Business Hours		Saturday, Sunday, and Holidays		Totals	
	#	%	#	%	#	%	#	%
0:00 - 15:00		0.00		0.00		0.00	0	0.00
15:01 - 30:00		0.00		0.00		0.00	0	0.00
30:01 - 45:00		0.00		0.00		0.00	0	0.00
45:01 - 60:00		0.00		0.00		0.00	0	0.00
More than 60:01		0.00		0.00		0.00	0	0.00
Totals	0	0.00	0	0.00	0	0.00	0	0.00
Response Times (Minutes)	Weekdays: During Normal Business Hours		Weekdays: After Normal Business Hours		Saturday, Sunday, and Holidays		Totals	
	#	%	#	%	#	%	#	%
0:00 - 15:00		0.00		0.00		0.00	0	0.00
15:01 - 30:00		0.00		0.00		0.00	0	0.00
30:01 - 45:00		0.00		0.00		0.00	0	0.00
45:01 - 60:00		0.00		0.00		0.00	0	0.00
More than 60:01		0.00		0.00		0.00	0	0.00
Totals	0	0.00	0	0.00	0	0.00	0	0.00



**Department of
Public Service**

Public Service Commission
Audrey Zibelman
Chair

Patricia L. Acampora
Gregg C. Sayre
Diane X. Burman
Commissioners

Kimberly A. Harriman
General Counsel
Kathleen H. Burgess
Secretary

Three Empire State Plaza, Albany, NY 12223-1350
www.dps.ny.gov

December 11, 2015

Mr. James Laurito, President
Central Hudson Gas and Electric Corporation
284 South Avenue
Poughkeepsie, NY 12601-4879

2016 Gas Safety Performance Measure Guidance and Instruction

Dear Mr. Laurito,

Attached are the updated emergency response time, damage prevention, and leak management reporting forms to be utilized during the upcoming 2016 calendar year. Prior to the 2016 calendar year all efforts made by Central Hudson Gas and Electric Corporation have been voluntary. These efforts have led to significant improvements to the overall statewide averages as they relate to each of the performance measures mentioned.

The Gas Safety Section of the Department of Public Service (DPS) Office of Electric, Gas, and Water uses performance measures to gauge the efforts of local gas distribution companies (LDCs) operating in New York in key areas of safety operations. The performance measures are the result of collaborative efforts, started in 2003, between Staff and the LDCs to improve the identification and tracking of certain areas that are critical to gas safety. The gas safety performance measures were developed as a means of improving LDCs gas delivery system safety performance in areas identified as presenting the highest risks. Performance measures are tools that Staff and the LDCs can use to monitor the safety operation and maintenance of distribution systems. These measures indicate how companies are performing from year to year, as well as trends over time.

In developing the performance measures, Staff first identified areas in LDCs' systems or operations that carry the greatest potential for harm to the public if performance is sub-standard. Staff then worked with the LDCs to develop methods for capturing and tracking appropriate data so they could be used as a practical management tool. This process led to the identification of three separate performance measures that have all been included in the annual performance measure reports.

Emergency response times gauge an LDC's ability to respond promptly to reports of gas leaks or emergencies by examining the percentage of calls that fall within various response times. This measure contains three specific goals: respond to 75% of emergency calls within 30 minutes, 90% within 45 minutes, and 95% within 60 minutes.

Leak management examines an LDC's performance in effectively maintaining leak inventories and keeping potentially hazardous leaks to a minimum. This measure focuses on the year-end backlog of total leaks and leaks requiring repair.

Damage prevention gauges the ability of an LDC to minimize damage to buried facilities caused by excavation activities. This measure is further broken down into subcategories such as damages due to mismarks (inaccurate marking by the LDC of its buried facilities), company and company contractor damages, third party excavator damage, and no-calls or failure to provide notice of intent to the one-call notification system.

The LDCs, overall, have shown significant improvement in each of these areas, although each year LDCs have had problems with respect to one or more of the measures. In addition, the performance measures discussed in LDC annual reports have formed the basis for targets in individual LDC rate cases, with negative revenue adjustments applied if targets are not met. The current annual reports and analysis can be found on the Department of Public Service website under the following Cases: 15-G-0248, 14-G-0176, 13-G-0213, 12-G-0222, 11-G-0242, 10-G-0225, 09-G-0454, 08-G-0413, 07-G-0461, 06-G-0566, 05-G-0204, and 04-G-0457.

In a parallel effort, the Commission, on August 15, 2013, in Case 13-M-0314, issued a request for proposals for an independent consultant to perform an operations audit focusing on the accuracy of the performance measure data that has been submitted by nine of the eleven major LDCs. The audit's objectives were to assess the completeness and accuracy of the measures submitted, assess comparability among the utilities, and determine the suitability of each of the performance measures identified. Any recommendations identified within the consultant's report would be evaluated for future reporting consideration. The results from the Case 13-M-0314 audit report are pending and will be addressed in the near future.

On May 12, 2015, a collaborative meeting was held with the LDCs to discuss the nuances between the data collected and how it was used related to the statewide comparisons. Several areas were identified as needing further clarification to address these concerns. The attached reporting forms have been updated to reflect these conversations and, moving forward, will be used accordingly in the analysis of the performance measure data. Should you or your staff need further clarification on these forms or would like to propose further modifications, requests can be made by sending an email to safety@dps.ny.gov. Continued improvement in the analysis of these performance measures should be the main objective for all LDCs and Staff.

In addition to the updated reporting forms and commencing in 2016, reporting of the performance measure data will no longer be voluntary, but rather mandatory for all LDCs. This will ensure that the necessary data for analysis continues to be reported by the LDCs on a regular basis. To date, the LDCs have been voluntarily reporting this data on a quarterly basis. These

calendar quarters end on March 31st, June 30th, September 30th, and December 31st each year. Central Hudson Gas and Electric Corporation would now be required to submit the performance measure data no later than the 30th day of the month following the end of the calendar quarters. All submissions shall be made by sending an email to safety@dps.ny.gov.

It is the responsibility of Central Hudson Gas and Electric Corporation to report its performance measure data on the required forms each year in addition to filing its data within the required timeframes. The collecting and reporting of performance measure data would commence on January 1, 2016. Please note that the compilation of data will be evaluated for future rate case performance targets and will not have an immediate effect on current targets.

I'd like to recognize Central Hudson Gas and Electric Corporation in its efforts and continued commitment to gas safety. If you or your staff have any questions or concerns, or would like to request electronic versions of these performance measure forms, please have them contact Christopher Stolicky at Christopher.Stolicky@dps.ny.gov or 518-473-9994. I look forward to any comments you may have on this reporting criteria and guidance.

Sincerely,



Cynthia McCarran
Deputy Director
Office of Electric, Gas, and Water

Enclosures:

- (1) 16 NYCRR 255.825(d) - Analysis of Response to Emergency Reports – Version 2016
- (2) Analysis of Damages on Gas Corporation Facilities – Version 2016
- (3) Analysis of Leaks on Gas Corporation Facilities – Version 2016



**Department of
Public Service**

Public Service Commission
Audrey Zibelman
Chair

Patricia L. Acampora
Gregg C. Sayre
Diane X. Burman
Commissioners

Kimberly A. Harriman
General Counsel
Kathleen H. Burgess
Secretary

Three Empire State Plaza, Albany, NY 12223-1350
www.dps.ny.gov

December 11, 2015

Mr. Craig S. Ivey, President
Consolidated Edison Company of New York, Inc.
4 Irving Place
New York, NY 10003-3598

2016 Gas Safety Performance Measure Guidance and Instruction

Dear Mr. Ivey,

Attached are the updated emergency response time, damage prevention, and leak management reporting forms to be utilized during the upcoming 2016 calendar year. Prior to the 2016 calendar year all efforts made by Consolidated Edison Company of New York, Inc. have been voluntary. These efforts have led to significant improvements to the overall statewide averages as they relate to each of the performance measures mentioned.

The Gas Safety Section of the Department of Public Service (DPS) Office of Electric, Gas, and Water uses performance measures to gauge the efforts of local gas distribution companies (LDCs) operating in New York in key areas of safety operations. The performance measures are the result of collaborative efforts, started in 2003, between Staff and the LDCs to improve the identification and tracking of certain areas that are critical to gas safety. The gas safety performance measures were developed as a means of improving LDCs gas delivery system safety performance in areas identified as presenting the highest risks. Performance measures are tools that Staff and the LDCs can use to monitor the safety operation and maintenance of distribution systems. These measures indicate how companies are performing from year to year, as well as trends over time.

In developing the performance measures, Staff first identified areas in LDCs' systems or operations that carry the greatest potential for harm to the public if performance is sub-standard. Staff then worked with the LDCs to develop methods for capturing and tracking appropriate data so they could be used as a practical management tool. This process led to the identification of three separate performance measures that have all been included in the annual performance measure reports.

Emergency response times gauge an LDC's ability to respond promptly to reports of gas leaks or emergencies by examining the percentage of calls that fall within various response times. This measure contains three specific goals: respond to 75% of emergency calls within 30 minutes, 90% within 45 minutes, and 95% within 60 minutes.

Leak management examines an LDC's performance in effectively maintaining leak inventories and keeping potentially hazardous leaks to a minimum. This measure focuses on the year-end backlog of total leaks and leaks requiring repair.

Damage prevention gauges the ability of an LDC to minimize damage to buried facilities caused by excavation activities. This measure is further broken down into subcategories such as damages due to mismarks (inaccurate marking by the LDC of its buried facilities), company and company contractor damages, third party excavator damage, and no-calls or failure to provide notice of intent to the one-call notification system.

The LDCs, overall, have shown significant improvement in each of these areas, although each year LDCs have had problems with respect to one or more of the measures. In addition, the performance measures discussed in LDC annual reports have formed the basis for targets in individual LDC rate cases, with negative revenue adjustments applied if targets are not met. The current annual reports and analysis can be found on the Department of Public Service website under the following Cases: 15-G-0248, 14-G-0176, 13-G-0213, 12-G-0222, 11-G-0242, 10-G-0225, 09-G-0454, 08-G-0413, 07-G-0461, 06-G-0566, 05-G-0204, and 04-G-0457.

In a parallel effort, the Commission, on August 15, 2013, in Case 13-M-0314, issued a request for proposals for an independent consultant to perform an operations audit focusing on the accuracy of the performance measure data that has been submitted by nine of the eleven major LDCs. The audit's objectives were to assess the completeness and accuracy of the measures submitted, assess comparability among the utilities, and determine the suitability of each of the performance measures identified. Any recommendations identified within the consultant's report would be evaluated for future reporting consideration. The results from the Case 13-M-0314 audit report are pending and will be addressed in the near future.

On May 12, 2015, a collaborative meeting was held with the LDCs to discuss the nuances between the data collected and how it was used related to the statewide comparisons. Several areas were identified as needing further clarification to address these concerns. The attached reporting forms have been updated to reflect these conversations and, moving forward, will be used accordingly in the analysis of the performance measure data. Should you or your staff need further clarification on these forms or would like to propose further modifications, requests can be made by sending an email to safety@dps.ny.gov. Continued improvement in the analysis of these performance measures should be the main objective for all LDCs and Staff.

In addition to the updated reporting forms and commencing in 2016, reporting of the performance measure data will no longer be voluntary, but rather mandatory for all LDCs. This will ensure that the necessary data for analysis continues to be reported by the LDCs on a regular basis. To date, the LDCs have been voluntarily reporting this data on a quarterly basis. These

calendar quarters end on March 31st, June 30th, September 30th, and December 31st each year. Consolidated Edison Company of New York, Inc. would now be required to submit the performance measure data no later than the 30th day of the month following the end of the calendar quarters. All submissions shall be made by sending an email to safety@dps.ny.gov.

It is the responsibility of Consolidated Edison Company of New York, Inc. to report its performance measure data on the required forms each year in addition to filing its data within the required timeframes. The collecting and reporting of performance measure data would commence on January 1, 2016. Please note that the compilation of data will be evaluated for future rate case performance targets and will not have an immediate effect on current targets.

I'd like to recognize Consolidated Edison Company of New York, Inc. in its efforts and continued commitment to gas safety. If you or your staff have any questions or concerns, or would like to request electronic versions of these performance measure forms, please have them contact Christopher Stolicky at Christopher.Stolicky@dps.ny.gov or 518-473-9994. I look forward to any comments you may have on this reporting criteria and guidance.

Sincerely,



Cynthia McCarran
Deputy Director
Office of Electric, Gas, and Water

Enclosures:

- (1) 16 NYCRR 255.825(d) - Analysis of Response to Emergency Reports – Version 2016
- (2) Analysis of Damages on Gas Corporation Facilities – Version 2016
- (3) Analysis of Leaks on Gas Corporation Facilities – Version 2016



**Department of
Public Service**

Public Service Commission
Audrey Zibelman
Chair

Patricia L. Acampora
Gregg C. Sayre
Diane X. Burman
Commissioners

Kimberly A. Harriman
General Counsel
Kathleen H. Burgess
Secretary

Three Empire State Plaza, Albany, NY 12223-1350
www.dps.ny.gov

December 11, 2015

Mr. Michael I. German
President and Chief Executive Officer
Corning Natural Gas Corporation
330 West William Street, P.O. Box 58
Corning, NY 14830-0058

2016 Gas Safety Performance Measure Guidance and Instruction

Dear Mr. German,

Attached are the updated emergency response time, damage prevention, and leak management reporting forms to be utilized during the upcoming 2016 calendar year. Prior to the 2016 calendar year all efforts made by Corning Natural Gas Corporation have been voluntary. These efforts have led to significant improvements to the overall statewide averages as they relate to each of the performance measures mentioned.

The Gas Safety Section of the Department of Public Service (DPS) Office of Electric, Gas, and Water uses performance measures to gauge the efforts of local gas distribution companies (LDCs) operating in New York in key areas of safety operations. The performance measures are the result of collaborative efforts, started in 2003, between Staff and the LDCs to improve the identification and tracking of certain areas that are critical to gas safety. The gas safety performance measures were developed as a means of improving LDCs gas delivery system safety performance in areas identified as presenting the highest risks. Performance measures are tools that Staff and the LDCs can use to monitor the safety operation and maintenance of distribution systems. These measures indicate how companies are performing from year to year, as well as trends over time.

In developing the performance measures, Staff first identified areas in LDCs' systems or operations that carry the greatest potential for harm to the public if performance is sub-standard. Staff then worked with the LDCs to develop methods for capturing and tracking appropriate data so they could be used as a practical management tool. This process led to the identification of

three separate performance measures that have all been included in the annual performance measure reports.

Emergency response times gauge an LDC's ability to respond promptly to reports of gas leaks or emergencies by examining the percentage of calls that fall within various response times. This measure contains three specific goals: respond to 75% of emergency calls within 30 minutes, 90% within 45 minutes, and 95% within 60 minutes.

Leak management examines an LDC's performance in effectively maintaining leak inventories and keeping potentially hazardous leaks to a minimum. This measure focuses on the year-end backlog of total leaks and leaks requiring repair.

Damage prevention gauges the ability of an LDC to minimize damage to buried facilities caused by excavation activities. This measure is further broken down into subcategories such as damages due to mismarks (inaccurate marking by the LDC of its buried facilities), company and company contractor damages, third party excavator damage, and no-calls or failure to provide notice of intent to the one-call notification system.

The LDCs, overall, have shown significant improvement in each of these areas, although each year LDCs have had problems with respect to one or more of the measures. In addition, the performance measures discussed in LDC annual reports have formed the basis for targets in individual LDC rate cases, with negative revenue adjustments applied if targets are not met. The current annual reports and analysis can be found on the Department of Public Service website under the following Cases: 15-G-0248, 14-G-0176, 13-G-0213, 12-G-0222, 11-G-0242, 10-G-0225, 09-G-0454, 08-G-0413, 07-G-0461, 06-G-0566, 05-G-0204, and 04-G-0457.

In a parallel effort, the Commission, on August 15, 2013, in Case 13-M-0314, issued a request for proposals for an independent consultant to perform an operations audit focusing on the accuracy of the performance measure data that has been submitted by nine of the eleven major LDCs. The audit's objectives were to assess the completeness and accuracy of the measures submitted, assess comparability among the utilities, and determine the suitability of each of the performance measures identified. Any recommendations identified within the consultant's report would be evaluated for future reporting consideration. The results from the Case 13-M-0314 audit report are pending and will be addressed in the near future.

On May 12, 2015, a collaborative meeting was held with the LDCs to discuss the nuances between the data collected and how it was used related to the statewide comparisons. Several areas were identified as needing further clarification to address these concerns. The attached reporting forms have been updated to reflect these conversations and, moving forward, will be used accordingly in the analysis of the performance measure data. Should you or your staff need further clarification on these forms or would like to propose further modifications, requests can be made by sending an email to safety@dps.ny.gov. Continued improvement in the analysis of these performance measures should be the main objective for all LDCs and Staff.

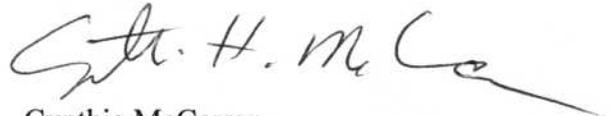
In addition to the updated reporting forms and commencing in 2016, reporting of the performance measure data will no longer be voluntary, but rather mandatory for all LDCs. This

will ensure that the necessary data for analysis continues to be reported by the LDCs on a regular basis. To date, the LDCs have been voluntarily reporting this data on a quarterly basis. These calendar quarters end on March 31st, June 30th, September 30th, and December 31st each year. Corning Natural Gas Corporation would now be required to submit the performance measure data no later than the 30th day of the month following the end of the calendar quarters. All submissions shall be made by sending an email to safety@dps.ny.gov.

It is the responsibility of Corning Natural Gas Corporation to report its performance measure data on the required forms each year in addition to filing its data within the required timeframes. The collecting and reporting of performance measure data would commence on January 1, 2016. Please note that the compilation of data will be evaluated for future rate case performance targets and will not have an immediate effect on current targets.

I'd like to recognize Corning Natural Gas Corporation in its efforts and continued commitment to gas safety. If you or your staff have any questions or concerns, or would like to request electronic versions of these performance measure forms, please have them contact Christopher Stolicky at Christopher.Stolicky@dps.ny.gov or 518-473-9994. I look forward to any comments you may have on this reporting criteria and guidance.

Sincerely,



Cynthia McCarran
Deputy Director
Office of Electric, Gas, and Water

Enclosures:

- (1) 16 NYCRR 255.825(d) - Analysis of Response to Emergency Reports – Version 2016
- (2) Analysis of Damages on Gas Corporation Facilities – Version 2016
- (3) Analysis of Leaks on Gas Corporation Facilities – Version 2016



**Department of
Public Service**

Public Service Commission
Audrey Zibelman
Chair

Patricia L. Acampora
Gregg C. Sayre
Diane X. Burman
Commissioners

Kimberly A. Harriman
General Counsel
Kathleen H. Burgess
Secretary

Three Empire State Plaza, Albany, NY 12223-1350
www.dps.ny.gov

December 11, 2015

Mr. Kenneth Daly, President
National Grid Long Island, New York, and Upstate
One MetroTech Center
Brooklyn, NY 11201

2016 Gas Safety Performance Measure Guidance and Instruction

Dear Mr. Daly,

Attached are the updated emergency response time, damage prevention, and leak management reporting forms to be utilized during the upcoming 2016 calendar year. Prior to the 2016 calendar year all efforts made by National Grid Long Island, New York, and Upstate have been voluntary. These efforts have led to significant improvements to the overall statewide averages as they relate to each of the performance measures mentioned.

The Gas Safety Section of the Department of Public Service (DPS) Office of Electric, Gas, and Water uses performance measures to gauge the efforts of local gas distribution companies (LDCs) operating in New York in key areas of safety operations. The performance measures are the result of collaborative efforts, started in 2003, between Staff and the LDCs to improve the identification and tracking of certain areas that are critical to gas safety. The gas safety performance measures were developed as a means of improving LDCs gas delivery system safety performance in areas identified as presenting the highest risks. Performance measures are tools that Staff and the LDCs can use to monitor the safety operation and maintenance of distribution systems. These measures indicate how companies are performing from year to year, as well as trends over time.

In developing the performance measures, Staff first identified areas in LDCs' systems or operations that carry the greatest potential for harm to the public if performance is sub-standard. Staff then worked with the LDCs to develop methods for capturing and tracking appropriate data so they could be used as a practical management tool. This process led to the identification of three separate performance measures that have all been included in the annual performance measure reports.

Emergency response times gauge an LDC's ability to respond promptly to reports of gas leaks or emergencies by examining the percentage of calls that fall within various response times. This measure contains three specific goals: respond to 75% of emergency calls within 30 minutes, 90% within 45 minutes, and 95% within 60 minutes.

Leak management examines an LDC's performance in effectively maintaining leak inventories and keeping potentially hazardous leaks to a minimum. This measure focuses on the year-end backlog of total leaks and leaks requiring repair.

Damage prevention gauges the ability of an LDC to minimize damage to buried facilities caused by excavation activities. This measure is further broken down into subcategories such as damages due to mismarks (inaccurate marking by the LDC of its buried facilities), company and company contractor damages, third party excavator damage, and no-calls or failure to provide notice of intent to the one-call notification system.

The LDCs, overall, have shown significant improvement in each of these areas, although each year LDCs have had problems with respect to one or more of the measures. In addition, the performance measures discussed in LDC annual reports have formed the basis for targets in individual LDC rate cases, with negative revenue adjustments applied if targets are not met. The current annual reports and analysis can be found on the Department of Public Service website under the following Cases: 15-G-0248, 14-G-0176, 13-G-0213, 12-G-0222, 11-G-0242, 10-G-0225, 09-G-0454, 08-G-0413, 07-G-0461, 06-G-0566, 05-G-0204, and 04-G-0457.

In a parallel effort, the Commission, on August 15, 2013, in Case 13-M-0314, issued a request for proposals for an independent consultant to perform an operations audit focusing on the accuracy of the performance measure data that has been submitted by nine of the eleven major LDCs. The audit's objectives were to assess the completeness and accuracy of the measures submitted, assess comparability among the utilities, and determine the suitability of each of the performance measures identified. Any recommendations identified within the consultant's report would be evaluated for future reporting consideration. The results from the Case 13-M-0314 audit report are pending and will be addressed in the near future.

On May 12, 2015, a collaborative meeting was held with the LDCs to discuss the nuances between the data collected and how it was used related to the statewide comparisons. Several areas were identified as needing further clarification to address these concerns. The attached reporting forms have been updated to reflect these conversations and, moving forward, will be used accordingly in the analysis of the performance measure data. Should you or your staff need further clarification on these forms or would like to propose further modifications, requests can be made by sending an email to safety@dps.ny.gov. Continued improvement in the analysis of these performance measures should be the main objective for all LDCs and Staff.

In addition to the updated reporting forms and commencing in 2016, reporting of the performance measure data will no longer be voluntary, but rather mandatory for all LDCs. This will ensure that the necessary data for analysis continues to be reported by the LDCs on a regular basis. To date, the LDCs have been voluntarily reporting this data on a quarterly basis. These

calendar quarters end on March 31st, June 30th, September 30th, and December 31st each year. National Grid Long Island, New York, and Upstate would now be required to submit the performance measure data no later than the 30th day of the month following the end of the calendar quarters. All submissions shall be made by sending an email to safety@dps.ny.gov.

It is the responsibility of National Grid Long Island, New York, and Upstate to report its performance measure data on the required forms each year in addition to filing its data within the required timeframes. The collecting and reporting of performance measure data would commence on January 1, 2016. Please note that the compilation of data will be evaluated for future rate case performance targets and will not have an immediate effect on current targets.

I'd like to recognize National Grid Long Island, New York, and Upstate in its efforts and continued commitment to gas safety. If you or your staff have any questions or concerns, or would like to request electronic versions of these performance measure forms, please have them contact Christopher Stolicky at Christopher.Stolicky@dps.ny.gov or 518-473-9994. I look forward to any comments you may have on this reporting criteria and guidance.

Sincerely,



Cynthia McCarran
Deputy Director
Office of Electric, Gas, and Water

Enclosures:

- (1) 16 NYCRR 255.825(d) - Analysis of Response to Emergency Reports – Version 2016
- (2) Analysis of Damages on Gas Corporation Facilities – Version 2016
- (3) Analysis of Leaks on Gas Corporation Facilities – Version 2016



**Department of
Public Service**

Public Service Commission
Audrey Zibelman
Chair

Patricia L. Acampora
Gregg C. Sayre
Diane X. Burman
Commissioners

Kimberly A. Harriman
General Counsel
Kathleen H. Burgess
Secretary

Three Empire State Plaza, Albany, NY 12223-1350
www.dps.ny.gov

December 11, 2015

Mr. Carl Carlotti, President
National Fuel Gas Distribution Corporation
6363 Main Street
Williamsville, NY 14221

2016 Gas Safety Performance Measure Guidance and Instruction

Dear Mr. Carlotti,

Attached are the updated emergency response time, damage prevention, and leak management reporting forms to be utilized during the upcoming 2016 calendar year. Prior to the 2016 calendar year all efforts made by National Fuel Gas Distribution Corporation have been voluntary. These efforts have led to significant improvements to the overall statewide averages as they relate to each of the performance measures mentioned.

The Gas Safety Section of the Department of Public Service (DPS) Office of Electric, Gas, and Water uses performance measures to gauge the efforts of local gas distribution companies (LDCs) operating in New York in key areas of safety operations. The performance measures are the result of collaborative efforts, started in 2003, between Staff and the LDCs to improve the identification and tracking of certain areas that are critical to gas safety. The gas safety performance measures were developed as a means of improving LDCs gas delivery system safety performance in areas identified as presenting the highest risks. Performance measures are tools that Staff and the LDCs can use to monitor the safety operation and maintenance of distribution systems. These measures indicate how companies are performing from year to year, as well as trends over time.

In developing the performance measures, Staff first identified areas in LDCs' systems or operations that carry the greatest potential for harm to the public if performance is sub-standard. Staff then worked with the LDCs to develop methods for capturing and tracking appropriate data so they could be used as a practical management tool. This process led to the identification of three separate performance measures that have all been included in the annual performance measure reports.

Emergency response times gauge an LDC's ability to respond promptly to reports of gas leaks or emergencies by examining the percentage of calls that fall within various response times. This measure contains three specific goals: respond to 75% of emergency calls within 30 minutes, 90% within 45 minutes, and 95% within 60 minutes.

Leak management examines an LDC's performance in effectively maintaining leak inventories and keeping potentially hazardous leaks to a minimum. This measure focuses on the year-end backlog of total leaks and leaks requiring repair.

Damage prevention gauges the ability of an LDC to minimize damage to buried facilities caused by excavation activities. This measure is further broken down into subcategories such as damages due to mismarks (inaccurate marking by the LDC of its buried facilities), company and company contractor damages, third party excavator damage, and no-calls or failure to provide notice of intent to the one-call notification system.

The LDCs, overall, have shown significant improvement in each of these areas, although each year LDCs have had problems with respect to one or more of the measures. In addition, the performance measures discussed in LDC annual reports have formed the basis for targets in individual LDC rate cases, with negative revenue adjustments applied if targets are not met. The current annual reports and analysis can be found on the Department of Public Service website under the following Cases: 15-G-0248, 14-G-0176, 13-G-0213, 12-G-0222, 11-G-0242, 10-G-0225, 09-G-0454, 08-G-0413, 07-G-0461, 06-G-0566, 05-G-0204, and 04-G-0457.

In a parallel effort, the Commission, on August 15, 2013, in Case 13-M-0314, issued a request for proposals for an independent consultant to perform an operations audit focusing on the accuracy of the performance measure data that has been submitted by nine of the eleven major LDCs. The audit's objectives were to assess the completeness and accuracy of the measures submitted, assess comparability among the utilities, and determine the suitability of each of the performance measures identified. Any recommendations identified within the consultant's report would be evaluated for future reporting consideration. The results from the Case 13-M-0314 audit report are pending and will be addressed in the near future.

On May 12, 2015, a collaborative meeting was held with the LDCs to discuss the nuances between the data collected and how it was used related to the statewide comparisons. Several areas were identified as needing further clarification to address these concerns. The attached reporting forms have been updated to reflect these conversations and, moving forward, will be used accordingly in the analysis of the performance measure data. Should you or your staff need further clarification on these forms or would like to propose further modifications, requests can be made by sending an email to safety@dps.ny.gov. Continued improvement in the analysis of these performance measures should be the main objective for all LDCs and Staff.

In addition to the updated reporting forms and commencing in 2016, reporting of the performance measure data will no longer be voluntary, but rather mandatory for all LDCs. This will ensure that the necessary data for analysis continues to be reported by the LDCs on a regular basis. To date, the LDCs have been voluntarily reporting this data on a quarterly basis. These

calendar quarters end on March 31st, June 30th, September 30th, and December 31st each year. National Fuel Gas Distribution Corporation would now be required to submit the performance measure data no later than the 30th day of the month following the end of the calendar quarters. All submissions shall be made by sending an email to safety@dps.ny.gov.

It is the responsibility of National Fuel Gas Distribution Corporation to report its performance measure data on the required forms each year in addition to filing its data within the required timeframes. The collecting and reporting of performance measure data would commence on January 1, 2016. Please note that the compilation of data will be evaluated for future rate case performance targets and will not have an immediate effect on current targets.

I'd like to recognize National Fuel Gas Distribution Corporation in its efforts and continued commitment to gas safety. If you or your staff have any questions or concerns, or would like to request electronic versions of these performance measure forms, please have them contact Christopher Stolicky at Christopher.Stolicky@dps.ny.gov or 518-473-9994. I look forward to any comments you may have on this reporting criteria and guidance.

Sincerely,



Cynthia McCarran
Deputy Director
Office of Electric, Gas, and Water

Enclosures:

- (1) 16 NYCRR 255.825(d) - Analysis of Response to Emergency Reports – Version 2016
- (2) Analysis of Damages on Gas Corporation Facilities – Version 2016
- (3) Analysis of Leaks on Gas Corporation Facilities – Version 2016



**Department of
Public Service**

Public Service Commission
Audrey Zibelman
Chair

Patricia L. Acampora
Gregg C. Sayre
Diane X. Burman
Commissioners

Kimberly A. Harriman
General Counsel
Kathleen H. Burgess
Secretary

Three Empire State Plaza, Albany, NY 12223-1350
www.dps.ny.gov

December 11, 2015

Mr. Mark S. Lynch, President
New York State Electric & Gas Corporation and
Rochester Gas & Electric Corporation
89 East Avenue
Rochester, NY 14649

2016 Gas Safety Performance Measure Guidance and Instruction

Dear Mr. Lynch,

Attached are the updated emergency response time, damage prevention, and leak management reporting forms to be utilized during the upcoming 2016 calendar year. Prior to the 2016 calendar year all efforts made by New York State Electric & Gas Corporation and Rochester Gas & Electric Corporation have been voluntary. These efforts have led to significant improvements to the overall statewide averages as they relate to each of the performance measures mentioned.

The Gas Safety Section of the Department of Public Service (DPS) Office of Electric, Gas, and Water uses performance measures to gauge the efforts of local gas distribution companies (LDCs) operating in New York in key areas of safety operations. The performance measures are the result of collaborative efforts, started in 2003, between Staff and the LDCs to improve the identification and tracking of certain areas that are critical to gas safety. The gas safety performance measures were developed as a means of improving LDCs gas delivery system safety performance in areas identified as presenting the highest risks. Performance measures are tools that Staff and the LDCs can use to monitor the safety operation and maintenance of distribution systems. These measures indicate how companies are performing from year to year, as well as trends over time.

In developing the performance measures, Staff first identified areas in LDCs' systems or operations that carry the greatest potential for harm to the public if performance is sub-standard. Staff then worked with the LDCs to develop methods for capturing and tracking appropriate data so they could be used as a practical management tool. This process led to the identification of

three separate performance measures that have all been included in the annual performance measure reports.

Emergency response times gauge an LDC's ability to respond promptly to reports of gas leaks or emergencies by examining the percentage of calls that fall within various response times. This measure contains three specific goals: respond to 75% of emergency calls within 30 minutes, 90% within 45 minutes, and 95% within 60 minutes.

Leak management examines an LDC's performance in effectively maintaining leak inventories and keeping potentially hazardous leaks to a minimum. This measure focuses on the year-end backlog of total leaks and leaks requiring repair.

Damage prevention gauges the ability of an LDC to minimize damage to buried facilities caused by excavation activities. This measure is further broken down into subcategories such as damages due to mismarks (inaccurate marking by the LDC of its buried facilities), company and company contractor damages, third party excavator damage, and no-calls or failure to provide notice of intent to the one-call notification system.

The LDCs, overall, have shown significant improvement in each of these areas, although each year LDCs have had problems with respect to one or more of the measures. In addition, the performance measures discussed in LDC annual reports have formed the basis for targets in individual LDC rate cases, with negative revenue adjustments applied if targets are not met. The current annual reports and analysis can be found on the Department of Public Service website under the following Cases: 15-G-0248, 14-G-0176, 13-G-0213, 12-G-0222, 11-G-0242, 10-G-0225, 09-G-0454, 08-G-0413, 07-G-0461, 06-G-0566, 05-G-0204, and 04-G-0457.

In a parallel effort, the Commission, on August 15, 2013, in Case 13-M-0314, issued a request for proposals for an independent consultant to perform an operations audit focusing on the accuracy of the performance measure data that has been submitted by nine of the eleven major LDCs. The audit's objectives were to assess the completeness and accuracy of the measures submitted, assess comparability among the utilities, and determine the suitability of each of the performance measures identified. Any recommendations identified within the consultant's report would be evaluated for future reporting consideration. The results from the Case 13-M-0314 audit report are pending and will be addressed in the near future.

On May 12, 2015, a collaborative meeting was held with the LDCs to discuss the nuances between the data collected and how it was used related to the statewide comparisons. Several areas were identified as needing further clarification to address these concerns. The attached reporting forms have been updated to reflect these conversations and, moving forward, will be used accordingly in the analysis of the performance measure data. Should you or your staff need further clarification on these forms or would like to propose further modifications, requests can be made by sending an email to safety@dps.ny.gov. Continued improvement in the analysis of these performance measures should be the main objective for all LDCs and Staff.

In addition to the updated reporting forms and commencing in 2016, reporting of the performance measure data will no longer be voluntary, but rather mandatory for all LDCs. This

will ensure that the necessary data for analysis continues to be reported by the LDCs on a regular basis. To date, the LDCs have been voluntarily reporting this data on a quarterly basis. These calendar quarters end on March 31st, June 30th, September 30th, and December 31st each year. New York State Electric & Gas Corporation and Rochester Gas & Electric Corporation would now be required to submit the performance measure data no later than the 30th day of the month following the end of the calendar quarters. All submissions shall be made by sending an email to safety@dps.ny.gov.

It is the responsibility of New York State Electric & Gas Corporation and Rochester Gas & Electric Corporation to report its performance measure data on the required forms each year in addition to filing its data within the required timeframes. The collecting and reporting of performance measure data would commence on January 1, 2016. Please note that the compilation of data will be evaluated for future rate case performance targets and will not have an immediate effect on current targets.

I'd like to recognize New York State Electric & Gas Corporation and Rochester Gas & Electric Corporation in its efforts and continued commitment to gas safety. If you or your staff have any questions or concerns, or would like to request electronic versions of these performance measure forms, please have them contact Christopher Stolicky at 518-473-9994 or Christopher.Stolicky@dps.ny.gov. I look forward to any comments you may have on this reporting criteria and guidance.

Sincerely,



Cynthia McCarran
Deputy Director
Office of Electric, Gas, and Water

Enclosures:

- (1) 16 NYCRR 255.825(d) - Analysis of Response to Emergency Reports – Version 2016
- (2) Analysis of Damages on Gas Corporation Facilities – Version 2016
- (3) Analysis of Leaks on Gas Corporation Facilities – Version 2016



**Department of
Public Service**

Public Service Commission
Audrey Zibelman
Chair

Patricia L. Acampora
Gregg C. Sayre
Diane X. Burman
Commissioners

Kimberly A. Harriman
General Counsel
Kathleen H. Burgess
Secretary

Three Empire State Plaza, Albany, NY 12223-1350
www.dps.ny.gov

December 11, 2015

Mr. John McAvoy
President and Chief Executive Officer
Orange & Rockland Utilities, Inc.
390 West Route 59
Spring Valley, NY 10977

2016 Gas Safety Performance Measure Guidance and Instruction

Dear Mr. McAvoy,

Attached are the updated emergency response time, damage prevention, and leak management reporting forms to be utilized during the upcoming 2016 calendar year. Prior to the 2016 calendar year all efforts made by Orange & Rockland Utilities, Inc. have been voluntary. These efforts have led to significant improvements to the overall statewide averages as they relate to each of the performance measures mentioned.

The Gas Safety Section of the Department of Public Service (DPS) Office of Electric, Gas, and Water uses performance measures to gauge the efforts of local gas distribution companies (LDCs) operating in New York in key areas of safety operations. The performance measures are the result of collaborative efforts, started in 2003, between Staff and the LDCs to improve the identification and tracking of certain areas that are critical to gas safety. The gas safety performance measures were developed as a means of improving LDCs gas delivery system safety performance in areas identified as presenting the highest risks. Performance measures are tools that Staff and the LDCs can use to monitor the safety operation and maintenance of distribution systems. These measures indicate how companies are performing from year to year, as well as trends over time.

In developing the performance measures, Staff first identified areas in LDCs' systems or operations that carry the greatest potential for harm to the public if performance is sub-standard. Staff then worked with the LDCs to develop methods for capturing and tracking appropriate data so they could be used as a practical management tool. This process led to the identification of

three separate performance measures that have all been included in the annual performance measure reports.

Emergency response times gauge an LDC's ability to respond promptly to reports of gas leaks or emergencies by examining the percentage of calls that fall within various response times. This measure contains three specific goals: respond to 75% of emergency calls within 30 minutes, 90% within 45 minutes, and 95% within 60 minutes.

Leak management examines an LDC's performance in effectively maintaining leak inventories and keeping potentially hazardous leaks to a minimum. This measure focuses on the year-end backlog of total leaks and leaks requiring repair.

Damage prevention gauges the ability of an LDC to minimize damage to buried facilities caused by excavation activities. This measure is further broken down into subcategories such as damages due to mismarks (inaccurate marking by the LDC of its buried facilities), company and company contractor damages, third party excavator damage, and no-calls or failure to provide notice of intent to the one-call notification system.

The LDCs, overall, have shown significant improvement in each of these areas, although each year LDCs have had problems with respect to one or more of the measures. In addition, the performance measures discussed in LDC annual reports have formed the basis for targets in individual LDC rate cases, with negative revenue adjustments applied if targets are not met. The current annual reports and analysis can be found on the Department of Public Service website under the following Cases: 15-G-0248, 14-G-0176, 13-G-0213, 12-G-0222, 11-G-0242, 10-G-0225, 09-G-0454, 08-G-0413, 07-G-0461, 06-G-0566, 05-G-0204, and 04-G-0457.

In a parallel effort, the Commission, on August 15, 2013, in Case 13-M-0314, issued a request for proposals for an independent consultant to perform an operations audit focusing on the accuracy of the performance measure data that has been submitted by nine of the eleven major LDCs. The audit's objectives were to assess the completeness and accuracy of the measures submitted, assess comparability among the utilities, and determine the suitability of each of the performance measures identified. Any recommendations identified within the consultant's report would be evaluated for future reporting consideration. The results from the Case 13-M-0314 audit report are pending and will be addressed in the near future.

On May 12, 2015, a collaborative meeting was held with the LDCs to discuss the nuances between the data collected and how it was used related to the statewide comparisons. Several areas were identified as needing further clarification to address these concerns. The attached reporting forms have been updated to reflect these conversations and, moving forward, will be used accordingly in the analysis of the performance measure data. Should you or your staff need further clarification on these forms or would like to propose further modifications, requests can be made by sending an email to safety@dps.ny.gov. Continued improvement in the analysis of these performance measures should be the main objective for all LDCs and Staff.

In addition to the updated reporting forms and commencing in 2016, reporting of the performance measure data will no longer be voluntary, but rather mandatory for all LDCs. This

will ensure that the necessary data for analysis continues to be reported by the LDCs on a regular basis. To date, the LDCs have been voluntarily reporting this data on a quarterly basis. These calendar quarters end on March 31st, June 30th, September 30th, and December 31st each year. Orange & Rockland Utilities, Inc. would now be required to submit the performance measure data no later than the 30th day of the month following the end of the calendar quarters. All submissions shall be made by sending an email to safety@dps.ny.gov.

It is the responsibility of Orange & Rockland Utilities, Inc. to report its performance measure data on the required forms each year in addition to filing its data within the required timeframes. The collecting and reporting of performance measure data would commence on January 1, 2016. Please note that the compilation of data will be evaluated for future rate case performance targets and will not have an immediate effect on current targets.

I'd like to recognize Orange & Rockland Utilities, Inc. in its efforts and continued commitment to gas safety. If you or your staff have any questions or concerns, or would like to request electronic versions of these performance measure forms, please have them contact Christopher Stolicky at Christopher.Stolicky@dps.ny.gov or 518-473-9994. I look forward to any comments you may have on this reporting criteria and guidance.

Sincerely,



Cynthia McCarran
Deputy Director
Office of Electric, Gas, and Water

Enclosures:

- (1) 16 NYCRR 255.825(d) - Analysis of Response to Emergency Reports – Version 2016
- (2) Analysis of Damages on Gas Corporation Facilities – Version 2016
- (3) Analysis of Leaks on Gas Corporation Facilities – Version 2016



**Department of
Public Service**

Public Service Commission
Audrey Zibelman
Chair

Patricia L. Acampora
Gregg C. Sayre
Diane X. Burman
Commissioners

Kimberly A. Harriman
General Counsel
Kathleen H. Burgess
Secretary

Three Empire State Plaza, Albany, NY 12223-1350
www.dps.ny.gov

December 11, 2015

Mr. Jim Grant
President and General Manager
St. Lawrence Gas Company, Inc.
33 Stearns Street
Massena, NY 13662-0270

2016 Gas Safety Performance Measure Guidance and Instructions

Dear Mr. Grant,

Attached are the updated emergency response time, damage prevention, and leak management reporting forms to be utilized during the upcoming 2016 calendar year. Prior to the 2016 calendar year all efforts made by St. Lawrence Gas Company, Inc. have been voluntary. These efforts have led to significant improvements to the overall statewide averages as they relate to each of the performance measures mentioned.

The Gas Safety Section of the Department of Public Service (DPS) Office of Electric, Gas, and Water uses performance measures to gauge the efforts of local gas distribution companies (LDCs) operating in New York in key areas of safety operations. The performance measures are the result of collaborative efforts, started in 2003, between Staff and the LDCs to improve the identification and tracking of certain areas that are critical to gas safety. The gas safety performance measures were developed as a means of improving LDCs gas delivery system safety performance in areas identified as presenting the highest risks. Performance measures are tools that Staff and the LDCs can use to monitor the safety operation and maintenance of distribution systems. These measures indicate how companies are performing from year to year, as well as trends over time.

In developing the performance measures, Staff first identified areas in LDCs' systems or operations that carry the greatest potential for harm to the public if performance is sub-standard. Staff then worked with the LDCs to develop methods for capturing and tracking appropriate data so they could be used as a practical management tool. This process led to the identification of

three separate performance measures that have all been included in the annual performance measure reports.

Emergency response times gauge an LDC's ability to respond promptly to reports of gas leaks or emergencies by examining the percentage of calls that fall within various response times. This measure contains three specific goals: respond to 75% of emergency calls within 30 minutes, 90% within 45 minutes, and 95% within 60 minutes.

Leak management examines an LDC's performance in effectively maintaining leak inventories and keeping potentially hazardous leaks to a minimum. This measure focuses on the year-end backlog of total leaks and leaks requiring repair.

Damage prevention gauges the ability of an LDC to minimize damage to buried facilities caused by excavation activities. This measure is further broken down into subcategories such as damages due to mismarks (inaccurate marking by the LDC of its buried facilities), company and company contractor damages, third party excavator damage, and no-calls or failure to provide notice of intent to the one-call notification system.

The LDCs, overall, have shown significant improvement in each of these areas, although each year LDCs have had problems with respect to one or more of the measures. In addition, the performance measures discussed in LDC annual reports have formed the basis for targets in individual LDC rate cases, with negative revenue adjustments applied if targets are not met. The current annual reports and analysis can be found on the Department of Public Service website under the following Cases: 15-G-0248, 14-G-0176, 13-G-0213, 12-G-0222, 11-G-0242, 10-G-0225, 09-G-0454, 08-G-0413, 07-G-0461, 06-G-0566, 05-G-0204, and 04-G-0457.

In a parallel effort, the Commission, on August 15, 2013, in Case 13-M-0314, issued a request for proposals for an independent consultant to perform an operations audit focusing on the accuracy of the performance measure data that has been submitted by nine of the eleven major LDCs. The audit's objectives were to assess the completeness and accuracy of the measures submitted, assess comparability among the utilities, and determine the suitability of each of the performance measures identified. Any recommendations identified within the consultant's report would be evaluated for future reporting consideration. The results from the Case 13-M-0314 audit report are pending and will be addressed in the near future.

On May 12, 2015, a collaborative meeting was held with the LDCs to discuss the nuances between the data collected and how it was used related to the statewide comparisons. Several areas were identified as needing further clarification to address these concerns. The attached reporting forms have been updated to reflect these conversations and, moving forward, will be used accordingly in the analysis of the performance measure data. Should you or your staff need further clarification on these forms or would like to propose further modifications, requests can be made by sending an email to safety@dps.ny.gov. Continued improvement in the analysis of these performance measures should be the main objective for all LDCs and Staff.

In addition to the updated reporting forms and commencing in 2016, reporting of the performance measure data will no longer be voluntary, but rather mandatory for all LDCs. This

will ensure that the necessary data for analysis continues to be reported by the LDCs on a regular basis. To date, the LDCs have been voluntarily reporting this data on a quarterly basis. These calendar quarters end on March 31st, June 30th, September 30th, and December 31st each year. St. Lawrence Gas Company, Inc. would now be required to submit the performance measure data no later than the 30th day of the month following the end of the calendar quarters. All submissions shall be made by sending an email to safety@dps.ny.gov.

It is the responsibility of St. Lawrence Gas Company, Inc. to report its performance measure data on the required forms each year in addition to filing its data within the required timeframes. The collecting and reporting of performance measure data would commence on January 1, 2016. Please note that the compilation of data will be evaluated for future rate case performance targets and will not have an immediate effect on current targets.

I'd like to recognize St. Lawrence Gas Company, Inc. in its efforts and continued commitment to gas safety. If you or your staff have any questions or concerns, or would like to request electronic versions of these performance measure forms, please have them contact Christopher Stolicky at Christopher.Stolicky@dps.ny.gov or 518-473-9994. I look forward to any comments you may have on this reporting criteria and guidance.

Sincerely,



Cynthia McCarran
Deputy Director
Office of Electric, Gas, and Water

Enclosures:

- (1) 16 NYCRR 255.825(d) - Analysis of Response to Emergency Reports – Version 2016
- (2) Analysis of Damages on Gas Corporation Facilities – Version 2016
- (3) Analysis of Leaks on Gas Corporation Facilities – Version 2016