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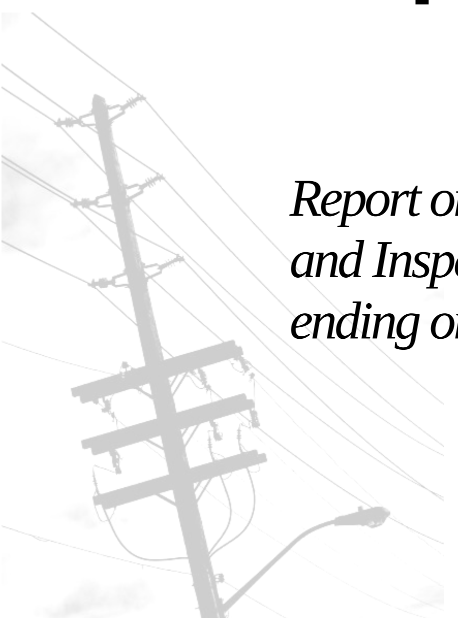
New York State Electric & Gas Corporation

Stray Voltage Test and Inspection



Report on the results of Stray Voltage Tests and Inspections for the 12-month period ending on November 30, 2006

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Background

On January 5, 2005, in Case 04-M-0159, the New York State Public Service Commission ("Commission" or "PSC") adopted a set of statewide safety standards ("Electric Safety Standards") that apply to the electric utilities subject to the Commission's jurisdiction, Order Instituting Safety Standards, issued January 5, 2005 ("Safety Order"). Further, pursuant to the Commission's Order on Petitions for Rehearing and Waiver (the "Order") issued and effective on July 21, 2005 in Case 04-M-0159 – Proceeding on Motion of the Commission to Examine the Safety of Electric Transmission and Distribution Systems, the Commission modified the Electric Safety Standards and required each utility, including New York State Electric & Gas Corporation ("NYSEG" or the "Company") to file a comprehensive report by January 15 each year that:

- Details the results of stray voltage tests and inspection conducted by the utility over the 12-month period ending on November 30 of the prior calendar year
- Addresses the performance mechanism specified in Section 10 of the Electric Safety Standards adopted by the PSC in the Safety Order
- Contains the certifications described in Section 7 of the Electric Safety Standards adopted by the PSC in the Safety Order
- Discusses the analyses undertaken on the causes of stray voltage within the utility's electric system, the conclusions drawn, the preventive and remedial measures identified, and the utility's plans to implement those measures
- Includes all other information that is pertinent to the issues addressed by the Electric Safety Standards

On January 17, 2006, NYSEG submitted its first annual report to the PSC for a full inspection cycle, a full underground and streetlight test cycle and a portion of the overhead distribution test cycle.

On October 20, 2006, NYSEG, at the request of PSC Staff, submitted an interim report to PSC staff detailing the results of the first full cycle of testing, including the completed overhead distribution and transmission testing.

Overview

Company Profile

NYSEG is located in upstate New York and serves approximately 848,000 electric customers and about 250,000 gas customers. NYSEG covers an area of about 18,350 square miles or 40% of upstate New York, and serves a primarily rural area composed of 149 small cities and villages.

NYSEG's electric delivery infrastructure consists of 4,480 circuit miles of transmission lines, 27,800 circuit miles of primary distribution 430 substations, 30,341 underground facilities and 25,893 streetlight/traffic signal facilities. This system includes an estimated 732,511 distribution structures and 59,732 transmission structures. NYSEG serves an average of 46 customers per square mile.

Program

NYSEG, in April, 2005, developed and initiated a Testing Pilot Program ("Pilot"). The purpose of the Pilot was to evaluate programs and processes of a testing program, prior to starting a much larger statewide testing effort. The Pilot practices and procedures were evaluated and modifications and enhancements were made as necessary to ensure that stray voltage testing was consistent with the Electric Safety Standards and that the results were accurate.

The Company began stray voltage testing on a statewide basis in July, 2005 and successfully completed stray voltage testing on all of its publicly accessible streetlights and electric facilities served by underground systems, as required by the Order, in mid-November.

NYSEG continued testing its distribution and transmission from January, 2006, completing in August, 2006. Concurrent with the distribution and transmission testing, the Company also began testing its second cycle underground and streetlighting, completing in October, 2006.

NYSEG's Stray Voltage Testing and Inspection Program is separated into four major categories or facility groups: streetlights, underground, overhead distribution and transmission. These groups are defined in more detail in the Stray Voltage Testing and Inspection Program sections.

The program developed by NYSEG also addressed daily stray voltage testing of all facilities and equipment accessed by work crews in the course of their regularly scheduled daily activities.

Stray Voltage Testing Program

The objective of the testing program is to identify and mitigate voltage conditions that should not ordinarily exist on an electric facility. NYSEG designed its stray voltage testing plan to fully meet the requirements set forth in the Electric Safety Standards.

Categories or Facility Groups

Streetlights

This group includes all metallic and concrete NYSEG owned streetlights, municipal owned streetlights and streetlight handhole covers. Testing of streetlights was performed at night when the fixture was energized. Streetlights on wood poles are included in the overhead distribution category.

In addition to streetlights, this group also includes traffic signal facilities. Traffic signal facilities include the various traffic control structures seen primarily at intersections and crosswalks, such as poles used to hang traffic and pedestrian control lights, pushbuttons, control cabinets and traffic signal handhole covers.

Municipal and Company streetlight records are not maintained on company maps. The task of finding and ensuring that all streetlights were tested was accomplished through the joint efforts of Regional Streetlight Representatives within the Company and municipalities to determine ownership and locations of streetlights. NYSEG also used the Customer Information System (CIS) to help obtain location and counts of streetlight structures.

Streetlights that were not working at the time field testers approached them were identified in the stray voltage database as "Needs Repair." These streetlights may be NYSEG owned or municipally owned. NYSEG, through its Regional Streetlight Representatives, determined the owners. If the streetlight was owned by the Company, a trouble ticket was generated and the repair was made immediately. A subsequent stray voltage test occurred, and the results were posted to the database record. If the streetlight was owned by a municipality, a notification in the form of a letter or e-mail was sent with instructions regarding who to contact when the repair was made. Once all necessary repairs were made, and NYSEG was notified by the municipality, a tester conducted a stray voltage test and the database record for that streetlight was updated with the results.

Underground

The underground category includes all facilities that are located either at grade level or below grade. Included in the underground facilities are padmount switchgear cases, padmount transformer cases, electric utility manhole covers, submersible transformer covers, electric utility handhole covers, network vaults and grates.

Overhead Distribution

This group of facilities includes distribution poles that have ground wires, riser pipes, guy wires/anchors, capacitor control boxes, recloser control boxes, regulator control boxes, switch control boxes, overhead switch handles, streetlights and CATV control/amplifier boxes.

Distribution poles as described above, with transmission overbuild, are included in this overhead distribution category.

Transmission

Transmission facilities consist of all overhead transmission towers, poles and structures with operating voltages at or above 34.5kV.

Testing Procedures

Stray voltage tests were performed by qualified test personnel on all electric utility facilities capable of conducting electricity. Test personnel were issued the following documents: Facilities Requiring Stray Voltage Testing, Stray Voltage Test Procedure and Response Notification Procedure.

Facilities Requiring Stray Voltage Testing

NYSEG developed a list of facilities that require testing in compliance with the PSC’s Order. This document is included in Appendix 1.

Stray Voltage Test Procedure

NYSEG developed a Stray Voltage Test Procedure to govern the testing performed by all NYSEG personnel and contractors. This procedure is included in Appendix 1.

Response Notification Procedures

NYSEG developed a Response Notification Procedure to govern the guarding and reporting of all detected stray voltage. This procedure details the appropriate action for all response levels: Critical, Immediate and No Response. The Response Notification Procedure is included in Appendix 1.

Training

Prior to the commencement of any field testing activities, supervisory, office support and field testing personnel from the testing contractor are given training by the Company. This training consisted of a detailed review of the Stray Voltage Testing Procedure; operation of the HD voltage tester and Fluke Multimeter; how to use the test equipment; how to respond to various levels of voltages found including guarding of facilities; and how to read the various circuit and facility maps given to the testing contractor. This program included training on the positional (GPS) and data acquisition/logging equipment. The positional (GPS) and data acquisition/logging equipment was furnished by NYSEG for use by the testing contractors. GPS equipment is utilized to provide a mechanism for contractor quality control.

Equipment

Stray Voltage measurement equipment is calibrated annually by a certified test laboratory. The following equipment was utilized by NYSEG:

Voltage Detection

The HD Electric LV-S-5 hand held Low Voltage Detector was utilized for the detection of stray voltage in accordance with the manufacturer's operating instruction manual to assure proper application. The LV-S-5 was designed to detect the presence of voltage exceeding 4.5 VAC. The presence of a voltage of 4.5 VAC or greater initiated a flashing red light in the tip of the detector. A PT-LV-5 Low Voltage Detector Tester was used to provide a field test of the LV-S-5 Detector to assure proper operation.

The LV-S-5 was used to individually test all conductive material or equipment accessible to the general public, on or encasing utility structures or equipment, for the presence of stray voltage.

Voltage Measurement

The Fluke Model 7-600 Multimeter was utilized to perform a contact test of the conductive material or equipment if the LV-S-5 detected a voltage. The Fluke 7-600 is a true RMS voltmeter with an input impedance of 2000 ohms (Ω).

The voltage measurement was made between the conductive material or equipment and a remote ground (see Ground Rod and 40 Ft. Cable Reel descriptions). If the measured voltage did not exceed 30 VAC, a shunt resistor (see Shunt Resistor description) was installed across the input terminals of the Fluke 7-600. The shunt resistor reduced the effective input impedance of the voltmeter to 500Ω. All voltages measured with the Fluke 7-600 were recorded, and appropriate response notifications issued based on the voltage measured.

Shunt Resistor

The shunt resistor was a 680Ω, 5 watt resistor installed in a plastic box with banana plugs for insertion into the input jacks of the Fluke 7-600. The equivalent impedance of the parallel impedance of the 2000Ω multimeter input and the 680Ω shunt resistor was 507Ω. If the voltage measured by the Fluke 7-600 without the resistor indicated a voltage level exceeding 30 VAC, the shunt resistor was not utilized to obtain a voltage measurement because such high voltage levels can damage the shunt resistor. It is assumed that any structure with a recorded voltage level exceeding 30 VAC without the resistor would have voltage above the critical level with the resistor, so all such cases were recorded and addressed as critical stray voltage issues.

Ground Rod
The ground rod is a 5/8 inch diameter, 18 inch long copper rod with one pointed end. The ground rod was generally installed into the earth within 3 feet of the material or equipment to be tested. If a suitable ground location could not be found within 3 feet of the material or equipment, the cable reel was used for locating the ground rod beyond 3 feet from the material or structure.

40 Ft. Cable Reel
The cable reel is a 40 foot reel of #14 wire with an attached Mueller #49C alligator clip and banana plug. The cable reel was used when a suitable ground rod location could not be found within 3 feet of the material or equipment to be tested.

Personnel
At the peak of the program, 174 people were involved in developing and implementing NYSEG's Stray Voltage Testing and Inspection Program. NYSEG assigned a full time Project Manager to oversee the program. Other internal resources from Maps and Records, Maintenance Engineering and Field Operations were utilized as needed. In addition, NYSEG contracted staff in two areas: Program Development/Support Personnel and Testing Contractor Personnel.

Program Development/Support Personnel
NYSEG employs a third-party IT contractor modify and manage a data collection and reporting application for stray voltage testing and inspection data. The stray voltage application requires full time IT contractor support to manage and maintain the application.

A full time contractor is employed by NYSEG to serve as the Stray Voltage Application Business Analyst and Data Coordinator between NYSEG staff and all contractors.

In order to support its overall Quality Assurance effort on data collected in the field, NYSEG employs six full-time contractors for the duration of the project.

In addition, four Field Coordinators were contracted by NYSEG to serve as liaisons between NYSEG and contract field personnel in the thirteen NYSEG divisions.

Testing Contractor Personnel
This category includes a staff of over 100 field testers and vendor back office support personnel required for the Stray Voltage Testing Program.

Stray Voltage Level Classification

When NYSEG performed stray voltage testing on facilities, the voltages as detected by the HD Detector were categorized into three levels with appropriate response criteria, as shown in Table 1.

Voltage Level	Voltage Range	Required Response
Level I	$8.0 \le x$	Critical
Level II	$4.5 \le x < 8$	Immediate
Level III	$0.0 \le x < 4.5$	None

Table 1 – Voltage Levels

Level I Voltage

Any measured voltage, as specified in the Stray Voltage Test Procedure, equal to or greater than 8 Volts Alternating Current (VAC) was deemed critical. If voltages at this level or higher detected in areas where the public can make contact with the facility, the facility was guarded. The area was made safe. Repairs were completed within 45 days.

Level II Voltage

Any measured voltage, as specified in the Stray Voltage Test Procedure, equal to or greater than 4.5 VAC and less than 8 VAC necessitated an immediate response. If voltages at this level were detected, the Project Foreman determined whether or not the facility required guarding and the immediacy of corrective action. The voltage was investigated to determine whether or not it ordinarily exists; if it does not, the voltage was investigated to determine if a source could be identified and if it could be corrected.

Level III Voltage

Any measured voltage, as specified in the Stray Voltage Test Procedure, greater than 0 VAC and less than 4.5 VAC was considered to be at a level that did not require immediate remedial action. This voltage poses no threat to public safety.

Not Detected

Any test on which the HD Detector fails to indicate the presence of voltage, as specified in the Stray Voltage Test Procedure, was categorized as Not Detected.

Structures Inaccessible to the Public

There are several types of Inaccessible structures as described below. If the contractor could not reach the structure to perform a test, it was identified as "Inaccessible" and all other pertinent data was collected in the field. Contractors made every attempt to locate and test all structures. There were a total of 123, or 0.01% of the total structures visited, in these categories.

Private Property

The structure was not tested if it was located on private property and was inaccessible due to walls, fences or barriers such as a locked gate, if excavation or bush/tree removal was required, or if there was unauthorized construction around the structure.

NYSEG Property

The structure was not tested if the structure was behind a company fence that limited access to the structure to authorized personnel only.

Buried / Paved Over

The structure was not tested if it had been covered over with dirt, pavement, or other foreign objects that would prohibit public access and prevent testing the structure. Contractors noted the structure ID on the issued maps and turned them in to Maintenance Engineering for verification with the Maps and Records Department. If Maps and Records confirmed that the structure does exist, company and contractor crews followed up and attempted to locate, uncover, and test the structure. If the structure could not be found, it was then considered removed from the field, and revisions to mapping were generated.

Inside Building

If a contractor identified a structure as being inside a building, NYSEG personnel verified that the structure was actually inside the building. If the NYSEG personnel verified that the structure was accessible to the public, a test was performed. Typically, customer owned equipment that is inside a building is in a locked equipment room that is accessible to authorized personnel only.

Limited Access Highways

The testing of structures located on limited access highways and interstates presents a safety risk to testing personnel, and those structures on limited access highways are typically not accessible to the public. The structure was not tested if NYSEG personnel verified that it was not accessible to the public and it was located on a major city, state, or national highway.

Stray Voltage Inspection Program

The objective of all inspections is to conduct a careful and critical examination of an electric facility by a qualified individual to determine the condition of the facility and the potential to cause or lead to safety hazards or adverse effects on reliability. NYSEG's inspection program was designed to visually inspect every facility at least once over a period of five years as required by the Order.

Inspections conducted during routine maintenance and other work not directly related to the inspection program count as an inspection visit, provided that the inspection is performed using the same safety and reliability criteria and to the same extent as would otherwise be required under the Electric Safety Standards.

Categories or Facility Groups

Streetlights

The streetlight inspection effort is a component of the scheduled re-lamping effort each NYSEG division undertakes on an annual basis. Crews replace lamps and photo-eyes, if necessary, on all visited streetlights and open the handhole and inspect the internal wiring. In conjunction with this maintenance program, the fixture is also inspected for various other conditions.

Underground

The underground inspection program provides a comprehensive inspection of NYSEG manholes, handholes, vaults, sub-holes, padmount transformers, padmount switchgear and all equipment, devices and cables present within these structures. This includes inspection of structural integrity, drainage electrical integrity of all equipment and cables (as permissible by visual inspection), mechanical integrity of all equipment and cables (as permissible by visual inspection), dangerous conditions and potential threats to electric system reliability.

Overhead Distribution

The overhead distribution inspection and maintenance program is a comprehensive program to identify and correct electric overhead distribution circuit deficiencies on all poles, equipment, and devices present on all distribution structures including guy wires/anchors, crossarms, switches, conductors and other accessory equipment.

Each division is required to visually inspect 20% of all distribution circuits annually within their respective division. On the identified circuits, 100% of all overhead assets must be inspected. Thermography inspections on main line electric circuits could be included in this program, but are not mandatory.

NYSEG also conducts annual inspections of all its substations. This effort is a comprehensive inspection of all equipment located within the facility by Division UC&M field personnel. Numerous inspections of substation equipment occur during the year as a result of ongoing maintenance work, but the annual inspection is a separate and independent activity.

Transmission

The objective of all transmission inspections is to identify and correct circuit deficiencies on all transmission circuits and structures.

Transmission inspections are accomplished through a comprehensive foot patrol, performed by an inspector competent in line inspection procedures. All inspection data will be entered on a per structure basis and managed electronically via company issued handheld units. Inspections include a visual examination of all transmission towers, poles, guy wires, risers, overhead conductors, switches, and other aboveground equipment and facilities.

Inspection Procedure

The annual performance target for inspections includes all existing Maintenance Engineering and Operations inspection programs if the inspection and collected data satisfies the Electric Safety Standards.

The number of facilities to be inspected in each cyclic inspection program shall be determined by one of the following methods:

- If an estimated number of facilities is known, 20% of that estimated number shall be inspected annually.
- If only an estimated number of circuit miles is known, 20% of that estimated number of miles shall be inspected annually.

Electric facility inspections shall be performed by trained and qualified personnel.

Inspection personnel shall wear all appropriate Personal Protective Equipment (PPE) (e.g. vests, gloves, safety glasses, steel-toed boots, etc.) in accordance with OSHA and Company safety procedures and practices.

Inspection personnel shall comply with all appropriate safety procedures and practices specified by the Company (e.g manhole entry, manhole rescue and work zone protection) when performing inspections.

Repair Prioritization

Inspection discrepancies have been classified into Level I, Level II and Level III conditions based on the severity of each discrepancy as it relates to public safety and electric system reliability. Level I discrepancies are the most critical, requiring immediate attention. Level II and Level III conditions, as determined by the inspector, are addressed as specified in the descriptions below.

Level I Condition

A Level I Condition is a condition of any electrical equipment, device or structure on an electric transmission or distribution system, overhead or underground, that poses a serious and immediate threat to either the safety of the general public or the reliability of the electric transmission or distribution system. Such conditions shall require an immediate response by the appropriate maintenance and repair personnel to correct the situation. Examples of such conditions include, but are not limited to, switches on manhole floors, tree limbs on conductors, conductors laying on crossarms, holes in padmount transformer cases, damaged conductors, floating primary conductors, broken primary ties, broken grounds, low hanging or downed conductors, broken poles, broken crossarms, and major woodpecker damage.

Level II Condition

A Level II Condition is a condition of any electrical equipment, device or structure that, if not corrected for an extended period of time (6 months or more), could develop into a Level I Condition. Such conditions require a response within a 60 day period based on the evaluation of the inspector. Examples of such conditions include, but are not limited to, damaged poles, damaged crossarms, broken crossarm supports, excessively corroded manhole equipment such as switches and transformers, damaged cable and conductors, excessively leaking cable joints, and moderate woodpecker damage.

Level III Condition

A Level III Condition is a condition of any electrical equipment, device or structure that has deficiencies, but those deficiencies do not pose any risk to public safety or the reliability of the electric transmission or distribution system. These conditions can be corrected through normal electric system maintenance practices within 12 - 24 months based on the evaluation of the inspector. Examples of such deficiencies include, but are not limited to, chipped or cracked suspension insulators, minor woodpecker holes, bent insulator pins, leaning poles, and loose pole braces.

Daily Work Stray Voltage Testing

NYSEG instituted the stray voltage testing procedures, to be included in the routine responsibilities of all field personnel, effective June 20, 2005. The intent of the daily testing is to ensure that no stray voltage exists that could endanger the general public or company or contract personnel.

The stray voltage test shall be performed upon arrival at each job site and before departing the job site either at the end of the workday or upon completion of the job. Personnel shall perform a daily test, in accordance with the Stray Voltage Test Procedure, on all facilities and equipment to be worked on in their job site. Facilities that do not require personnel to touch them do not require implementation of the Stray Voltage Test Procedure.

Should a stray voltage situation be identified, the crew shall be responsible for correcting the stray voltage source. If the crew is unable to resolve the situation, they shall obtain the required technical support, personnel or equipment necessary to resolve the situation.

Testing and Inspection Results

Testing

In the course of the NYSEG Stray Voltage Testing Program, completed on November 30, 2006, contractors visited 848,477 structures and identified 72 facilities with a Level I Stray Voltage as described in the Stray Voltage Testing Procedure, resulting in a detection rate of .008%. For the reporting period, NYSEG conducted stray voltage testing on 100% of its entire system. In each of the Level I stray voltage cases, the contractor guarded the location until relieved by NYSEG personnel. NYSEG personnel made each location safe before leaving the location. All NYSEG Level I stray voltage cases were repaired within the 45-day requirement. Table 2 displays the 72 cases of Level I stray voltage in the overall Stray Voltage Program.

Structure Type	Total Structures	Stray Voltages	Detection Rate
Streetlight	25,893	46	0.178%
Underground	30,341	0	0.000%
Distribution	732,511	19	0.003%
Transmission	59,732	7	0.012%
	848,477	72	0.008%

Table 2 – Overall Stray Voltage

Streetlights

Streetlight facilities are defined in the Stray Voltage Program section and in accordance with the Safety Order.

NYSEG contractors visited 25,893 (100%) of its streetlight structures to perform a stray voltage test; all of these structures met stray voltage criteria for testing. Of the structures tested, only 46 were found with a Level I stray voltage, for a .18% detection rate. Table 3 displays a summary of all streetlight test results.

Streetlight (of 25,893 total visited there were 0 not required)

Voltage Levels	Voltages Found	Percent of Tested
Level I	46	0.18%
Level II	17	0.07%
Level III	116	0.45%
Not Detected	25,711	99.30%
Inaccessible	3	0.01%
	25,893	100.00%

Table 3 – Streetlight Stray Voltage

Underground

NYSEG contractors visited 30,341 of its underground structures to perform a stray voltage test; all of these structures had stray voltage criteria. Of the structures tested, 0 were found with a Level I stray voltage. Table 4 displays a summary of all underground test results.

Underground (of 30,341 total visited there were 0 not required)

Voltage Levels	Voltages Found	Percent of Tested
Level I	0	0.00%
Level II	0	0.00%
Level III	74	0.24%
Not Detected	30,147	99.36%
Inaccessible	120	0.40%
	30,341	100.00%

Table 4 –Underground Stray Voltage

Overhead Distribution

NYSEG contractors visited 732,511 distribution structures to perform a stray voltage test; 248,974 of these structures did not have stray voltage criteria. Of the 483,537 structures with stray voltage criteria, 19 were found with a Level I stray voltage, for a .003% detection rate. Table 5 displays a summary of all distribution test results.

Distribution (of 732,511 total visited there were 248,974 not required)

Voltage Levels	Voltages Found	Percent of Tested
Level I	19	0.00%
Level II	16	0.00%
Level III	2,231	0.46%
Not Detected	473,864	98.00%
Inaccessible	7,407	1.53%
	483,537	100.00%

Table 5 – Overhead Distribution Stray Voltage

Transmission

NYSEG contractors visited 59,732 transmission structures to perform a stray voltage test; 4,094 of these structures did not have stray voltage criteria. Of the structures tested, 7 were found with a Level I voltage. Upon investigation, the Company has found these are not shock voltages attributable to structure or equipment defects (see Transmission Level I Responses below).Table 6 displays a summary of all transmission test results.

Transmission (of 59,732 total visited there were 4,094 not required)

Voltage Levels	Voltages Found	Percent of Tested
Level I	7	0.01%
Level II	20	0.04%
Level III	971	1.75%
Not Detected	51,558	92.67%
Inaccessible	3,082	5.54%
	55,638	100.00%

Table 6 – Transmission Stray Voltage

Transmission Level I Responses

Critical responses were initiated for the 7 wood transmission pole structures exhibiting 8 VAC or greater.

Based on a follow-up investigation, the stray voltages measured on the 7 transmission structures appear to be conditions inherent to the design and operation of the system. The voltage results from a difference in potential between the static wire and a remote ground. These are not shock voltages attributable to structure or equipment defects.

Inspection

NYSEG conducts separate inspection programs for the equipment in each of the four categories or facility groups: underground, streetlights, overhead distribution and transmission. The Company has completed inspections on 57% of streetlight facilities, 28% of underground facilities, 29% of overhead distribution facilities and 44% of transmission facilities. This represents a total inspection, for this reporting period, of 30% of NYSEG's total system, and 52% of the total system since the inception of the program.

Streetlights

As a result of the inspection program, 57% of streetlight facilities have been inspected. This inspection identified 70 structures with discrepancies, of the 3,490 structures inspected. Table 7 displays a summary of all streetlight inspection results.

Streetlight

Inspection Conditions	Discrepancies Found	Percent of Inspected
Condition I	0	0.00%
Condition II	69	1.98%
Condition III	1	0.03%
	70	2.01%

Table 7 – Streetlight Inspection

Underground

As a result of the inspection program, 28% of the underground system has been inspected. This inspection identified 705 structures with discrepancies, of the 8,783 inspected. Table 8 displays a summary of all underground inspection results.

Underground

Inspection Conditions	Discrepancies Found	Percent of Inspected
Condition I	38	0.43%
Condition II	42	0.48%
Condition III	625	7.12%
	705	8.03%

Table 8 – Underground Inspection

Overhead Distribution

As a result of the inspection program, 29% of the overhead distribution system has been inspected. This inspection identified 899 structures with discrepancies, of the 236,588 inspected. Table 9 displays a summary of all distribution inspection results.

Overhead Distribution

Inspection Conditions	Discrepancies Found	Percent of Inspected
Condition I	147	0.06%
Condition II	158	0.07%
Condition III	594	0.25%
	899	0.38%

Table 9 – Streetlight Inspection

Transmission

As a result of the inspection program, 44% of the transmission system has been inspected. This inspection identified 577 structures with discrepancies, of the 31,824 inspected. Table 10 displays a summary of all transmission inspection results.

Transmission

Inspection Conditions	Discrepancies Found	Percent of Inspected
Condition I	59	0.19%
Condition II	114	0.36%
Condition III	404	1.27%
	577	1.81%

Table 10 – Transmission Inspection

Analysis of Results

Summary of Critical Responses

The NYSEG 2006 stray voltage testing identified 72 Level I facilities, including the 7 transmission structures explained in table six. The remaining 65 required safeguarding and repair, out of the 848,477 facilities visited, for a detection rate of .008%. All critical responses were made safe immediately. All repairs were completed within 45 days.

The itemized breakdown of causes is contained in Table 11.

Structure Type	Cause of Stray Voltage	Stray Voltages Found
Streetlights	Defective Neutral Connection – Light Pole	16
Streetlights	Defective Neutral – Underground Cable	21
Streetlights	Defective Conductor Connection – Handhole	1
Streetlights	Defective Light Fixture	2
Streetlights	Defective Conductor Connection – Light Pole	1
Streetlights	Municipal/Customer Owned	5
Distribution	Pole Ground Connection	12
Distribution	Defective Neutral – Underground Cable	1
Distribution	Customer Owned Cable	6
		65

Table 11 – NYSEG Itemized Causes of Critical Responses

Based on the causes of the critical responses, NYSEG inspectors will thoroughly inspect fixtures, neutral connections and the correct wiring of street light poles while performing structure inspections.

Other Pertinent Information

Quality Assurance Measures Instituted

Data Submission Quality Assurance

The Stray Voltage Database Administrator is charged with the responsibility of receiving, controlling, and maintaining all testing data associated with the stray voltage project. Throughout the testing effort, the testing contractor submits their testing data to NYSEG in the form of batch files.

Testing data batch files are submitted to the Stray Voltage Data Administrator for QA/QC reviews. The first review that takes place is for data accuracy. If approved, IT Data Managers load the file into the production database and forward a copy of the file to Global Positioning System (GPS) Data Manager, for the second review, to check the data for positional accuracy (See Stray Voltage GPS QA/QC Process). If the data is not acceptable, the Data Administrator notifies the contractor of such and the reasons for failure. The Testing Contractor remedies the problems and re-submits the failed file with corrections.

Following vendor batch file approval through the program administrator, the batch is loaded into NYSEG's data storage facility (SDE) in ArcMAP. ArcMAP is the GIS software tool that is used to check the vendor point data for quality assurance. Gross geographical errors can easily be located during the loading process. The batch is rejected if gross geographical errors are found.

Vendor data is first analyzed against Real-Time Kinematics (RTK) control data. These are random poles that were GPS located by NYSEG's field crew prior to vendor pole locating. Vendor points must fall within a seven foot radius of the control points. If points fall outside of this radius, they "fail" this QA/QC analysis.

Secondly, data is analyzed against New York State Orthophotography. Each batch of data is broken down by tester name. Based on the total number of points (by tester), a random sample set is analyzed. The sample set is based on military standard sampling procedures (MIL-STD-105E: Sampling Procedures and Tables for Inspection by Attributes). NYSEG uses General Inspection Level I, and a 4.0 Acceptable Quality Level Tables I and II-A. Again, vendor points must fall within a seven foot radius of the pole location on the photography. If the sample set does not achieve an acceptable level according to the table, the tester "fails" this QA/QC analysis. After all tester sample points are analyzed in a batch, they are totaled. If more than 5% of the sample points fail, the entire batch "fails" this QA/QC analysis.

And thirdly, data is checked for duplicates. An analysis is run to search for duplicate pole locations. Points with identical structure ID's are flagged as duplicates.

Other tests are performed to check for attribute accuracy, such as the latitude and longitude coordinates, street names, dates and times, Positional Dilution of Precision (PDOP) values, and pole numbers.

In addition, other geographic checks are performed to find anomalies in the data, for example, large amounts of digitized points or irregularities in pole locations. The GPS time element is also analyzed for realistic data collection patterns. The result from this time analysis sometimes calls into question whether a tester could feasibly be at the pole to perform the stray voltage test.

Results of the QA/QC GPS data review are recorded on the Stray Voltage Tracking Log located on the corporate server, Stray Voltage/Project Tracking directory. Reports of the QA/QC results are copied to the GPS_Reviews folder in the above directory. A status report is emailed to the Data Administrator, who then forwards the QA/QC Reports to the vendor. Any other findings or anomalies in the data are reported to the project managers.

Random Quality Assurance

On an ongoing basis, NYSEG is performing many quality assurance measures to ensure testing data accuracy. These include investigations into 1) inaccessible structures to determine nature of inaccessibility, 2) performance of individual testers, 3) miscellaneous anomalies found in testing data, 4) checking circuit maps to ensure all distribution poles have been visited. Data for individual testers can be reviewed to determine their accuracy and performance. Problem testers are identified to the testing contractor and, if need be, removed from the testing effort. Any discrepancies found as a result of random data sampling checks like wrong town or street name and incorrect spellings would be corrected.

In addition to these measures, Field Coordinators conducted random field visits to ascertain that field contractors were performing tests on all required structures. During these visits, the Field Coordinator answered questions about map reading, structure IDs and location of structures. In addition to field visits, the Field Coordinator also performed follow up on randomly chosen completed maps to check that all structures were tested and recorded properly.

NYSEG developed an Inspection QA/QC Program for the purpose of independently verifying the results of the inspection effort as reported by each division for the current inspection year. This program includes comparing the results of an independent inspection of a randomly selected sample set of inspections reported as completed by the divisions with the results reported by the division.

Research and Development

As part of the Stray Voltage Program development, NYSEG evaluated the Sarnoff SVD2000 Detector.

Sarnoff SVD2000 Stray Voltage Detector

On 12/13/06 Sarnoff Corporation performed a field demonstration for NYSEG of the mobile SVD2000 Stray Voltage Detection Unit on eight (8) streets in a Cheektowaga, New York subdivision. The subdivision streets were lined with steel streetlights fed by direct buried, underground secondary conductors. There were a few steel, streetlight handholes on these streets. All the streets had rear lot primary and secondary overhead conductors and transformers. In several locations the overhead primary crossed the streets to feed from one rear lot to another.

Based on the NYSEG evaluation of the demonstration, the following conclusions were made concerning the operation of the SVD2000:

- It accurately identifies the presence of electric fields on structures within the 15 ft. detection zone but the structures had to be isolated from other electric field sources.
- Roadside overhead conductors make a "stray voltage" signal indistinguishable from the background "noise."
- Electrical devices (traffic signal lights, electric signs, Christmas decorations, etc.) can negatively impact "stray voltage" signal detection due to the background "noise."
- Voltage measurements are performed based on the SVD2000 operator's interpretation of the magnitude of the computer displayed electric field signal waveform and an audible tone level.
- Within the specified 15 ft. detection zone, the SVD2000 can survey a large number of structures in a short time. However, this is based on the stipulation the structures are isolated from overhead conductors and other electrical devices.

Based on the foregoing conclusions, it is not recommended that NYSEG use the existing Sarnoff SVD2000 to perform stray voltage tests on electric facilities. This recommendation is also supported by the following rationale:

- In the urban areas of the NYSEG operating area:
    - Intermingling of overhead, underground and streetlight systems severely limits the application of the SVD2000.
    - Use of the SVD2000 would be limited to the following general locations:
        - Downtown, center city areas.
        - Streetlights in underground residential areas.
        - Underground residential areas where all structures are within 15 ft. of the street.

- Manual testing will still be required in a significant portion of any areas the SVD2000 is utilized due to the limitation of the 15 ft. detection zone.

- The logistics of implementing the SVD2000 process in conjunction with the manual testing program that would still be required to test the structures not reachable with the SVD2000 would be a complicated, time consuming and costly effort.

- The SVD2000 does not identify each individual structure tested and therefore does not generate individual structure test results.

- Additional concerns must be resolved, and additional costs incurred, to address safety concerns when operating the test vehicle in urban areas. The frequent stops required to perform voltage measurements present additional safety concerns.

- In the rural areas of the NYSEG franchise area, which are primarily overhead installations, the SVD2000 does not have any practical applications.

Shock Reports

2006 Reported Electric Shocks

This shock report, requested by PSC Staff, is for the period 1/1/06 – 12/31/06.

NEW YORK STATE ELECTRIC AND GAS Data as of 12/31/2006	Yearly Total
I. Total shock calls received:	
Voltage Found	3
Unsubstantiated	8
Employee Contact	2
Non-Employee Contact	9
II. Medical Attention:	
Employee	2
Non-Employee	4
Domestic Animal	0
The following sections apply for the incidents listed as "Voltage Found" in Section I	
III. Equipment Ownership:	
Utility	1
Non-utility (ConEd only)	0
Customer	2
IV. Action to make safe:	
Permanent repair at time of discovery	1
Temp. repair at time of discovery	1
Cut and cap service line	0
Customer circuit breaker or fuse	1
Barriers	0
Other	0
V. Voltage Source:	
Streetlight service line	0
Streetlight base connection	0
Streetlight internal wiring or light fixture	0
Issue with primary, joint, or transformer	0
Defective service line	1
Abandoned service line	0
Customer wiring	1
Customer equipment	1
Other	0
VI. Voltage Range:	
1.0V to 4.4V	0
4.5V to 7.9V	0
8.0V to 24.9V	2
25.0V to 99.9V	0
100.0V or higher	1

Shunt Resistor

The following defines why shunt resistors are utilized in the measurement and identification of stray voltage versus induced voltage. Overhead power lines are not shielded conductors, and the electric fields surrounding them can induce voltages onto metallic objects within the fields. These fields are not indicative of a failed component of the electric system. Normally induced voltages are not harmful, and in most situations, humans cannot feel or detect these voltages. However, induced voltages can trigger the HD LV-S-5 stray voltage indicator and cause a high impedance digital voltmeter to falsely indicate a harmful stray voltage condition.

A very high input impedance digital voltmeter is designed not to draw a sufficient current capable of affecting the circuit being tested. However, a high input impedance voltmeter has the disadvantage of not being able to distinguish between a stray voltage capable of delivering a harmful electric shock and a harmless induced voltage incapable of generating sufficient current to cause an injury.

When using a high input impedance digital voltmeter to determine whether or not a voltage has the capacity to deliver sufficient current to cause injury, a shunt resistor is used to reduce the voltmeters input impedance. The voltage developed across the resultant voltmeter input impedance (the parallel combination of the shunt resistor and voltmeter input impedance) by the current flowing through it indicates the potential for the voltage to cause injury.

Therefore, a shunt resistor is used in combination with the voltmeters when a potential stray voltage has been identified by the HD LV-S-5 detector. The size of the shunt resistor is determined by the input impedance of the digital voltmeters to comply with PSC recommendations.

Appendix 1 – Procedures

Facilities Requiring Stray Voltage Testing
The following facilities shall be tested for stray voltage as defined in the Stray Voltage Test Procedure. Each facility listed with the described attachment(s) is considered one test unit.

Streetlight Facilities
Utility / Municipal Streetlight Poles
- Metallic (light shall be activated)
- Concrete (light shall be activated)

Utility / Municipal Street Light Handhole Covers (light shall be activated)

Traffic Signal Poles – Wood and Metallic (light shall be activated)
- Ground wires
- Riser pipes
- Guy wires/anchors
- Traffic signal handhole covers
- Traffic signal pedestals
- Traffic signal cabinets

Overhead Distribution Facilities
- Ground wires
- Riser pipes
- Guy wires/anchors
- Capacitor control boxes
- Recloser control boxes
- Regulator control boxes
- Switch control boxes
- Overhead switch handles
- CATV control/amplifier boxes
- Substation Fences – Utility and Customer Owned
- Electric Equipment Fences – Utility and Customer Owned

Underground Facilities
- Padmount switchgear cases
- Padmount transformer cases
- Electric utility manhole covers
- Submersible transformer covers
- Electric utility handhole covers
- Network vaults and grates

Transmission Facilities
- Ground wires
- Riser pipes
- Guy wires/anchors
- Switch control boxes
- Switch handles

Stray Voltage Test Procedure (rev. March 21, 2006)

1. Requirements

1.1. Stray Voltage Tests shall be performed by qualified test personnel on all above ground electric utility facilities that are capable of conducting electricity as specified in company Facilities Requiring Stray Voltage Testing.
1.2. Test personnel shall be issued the following documents: Facilities Requiring Stray Voltage Testing and Response Notification Procedure.
1.3. Test personnel shall wear all appropriate PPE (e.g. vests, gloves, safety glasses, steel-toed boots, etc.) in accordance with OSHA and all other respective utility safety procedures and practices.
1.4. The operation of all Voltage Detectors and Multimeters shall be verified daily. Verification shall be performed before beginning daily testing and upon completion of the daily tests.
1.5. Test equipment batteries shall be changed periodically to assure proper operation of the detectors and detector testers. The frequency should be based on operating experience.
1.6. If you don't have the HD Electric LV-S-5 Direct Contact Voltage Detector, proceed to Step 3 – Voltage Measurement Procedure.

2. Voltage Detection Procedure

2.1. LV-S-5 Setup
2.1.1. The HD Electric PT-LV-S-5 Low Voltage Detector Tester shall be used in accordance with the Instruction Manual to verify proper operation.
2.1.2. The LV-S-5 detector is always on. It does not have an on/off switch. The LV-S-5 is activated by the presence of voltage exceeding 4.5 VAC.
2.1.3. The presence of a voltage is indicated by the flashing red light in the end of the detector.

2.2. LV-S-5 Operation
2.2.1. The LV-S-5 shall be held and used per Instruction Manual to assure proper application.
2.2.2. Holding the LV-S-5 as instructed, move the Voltage Detector towards the facility to be tested until contact is made.
2.2.3. Individually test all conductive devices on each structure.
2.2.4. If the detector light is activated on contact by any one (1) device on a structure, proceed to Voltage Measurement Procedure.
2.2.5. If the detector light is not activated on contact with any device on a structure, no voltage is present on the structure. Proceed to Data Entry Requirements.

3. Voltage Measurement Procedure

3.1. All voltage measurements shall be conducted between metallic surfaces that are clean and bare.
3.2. A reference ground shall be established for the test using the 18" copper rod provided or other suitable ground (e.g. portable ground, system neutral, grounded metallic case, etc.).
3.3. The voltage measurement shall be made between the structure facility on which the voltage was detected and the reference ground.

3.4. Multimeter (VOM) Setup Procedure
   3.4.1. Plug test leads into Multimeter.
   3.4.2. Turn VOM on.
   3.4.3. Select auto range or the highest voltage range.

3.5. Multimeter Tests Without 500 Ohm Resistor Installed
   3.5.1. Connect test leads; BLACK to reference ground, RED to structure or device. Note: If test leads are insufficient to span the distance between the reference ground and the structure or device to be tested, use the Cable Reel provided for added length.
   3.5.2. Measure and record voltage.
   3.5.3. If the measured voltage is less than 30 VAC, proceed to Step 3.6.
   3.5.4. If the measured voltage exceeds 30 VAC do not proceed to Step 3.6. A measured voltage exceeding 30 VAC requires implementation of the Response Notification Procedure (Critical Response).
   3.5.5. Remove test leads from VOM.

3.6. Multimeter Tests With 500 Ohm Resistor Installed
   3.6.1. Insert resistor box into VOM.
   3.6.2. Insert test leads into resistor box placed in into the VOM.
   3.6.3. Connect test leads; BLACK to reference ground, RED to structure or device. Note: If test leads are insufficient to span the distance between the reference ground and the structure or device to be tested, use the Cable Reel provided for added length.
   3.6.4. Measure and record voltage.

3.7. Response To Measured Voltage With 500 Ohm Resistor Installed
   3.7.1. Measured Voltage ≥ 8 VAC – Initiate Response Notification Procedure (Critical Response).
   3.7.2. 4.5 VAC ≤ Measured Voltage < 8 VAC – Initiate Response Notification Procedure (Immediate Response).
   3.7.3. 0 ≤ Voltage Measured < 4.5 VAC – No Response Required.

Data Entry Requirements

Complete data fields as required on hand-held devices.

Response Notification Procedure (rev. April 5, 2006)

NOTE: If Response Notification Procedure is initiated by a Company Line Crew, proceed directly to Response Crew responsibilities.

1. Critical Response Notification (CRN) - Level I Voltage ($V_{Resistor} \geq 8$ VAC) or Condition.

1.1. Tester responsibilities:
- 1.1.1. Immediately contact an Energy Control Center (ECC) System Operator and Contractor Coordinator to initiate the CRN.
- 1.1.2. Guard the device until relieved by a guard, response crew, or other authorized personnel.
- 1.1.3. Record the CRN and notification time into the stray voltage database.

1.2. Contractor Coordinator responsibilities:
- 1.2.1. Contact ECC and determine if a Guard is necessary to replace the tester.
- 1.2.2. Verify the structure has been made safe.
- 1.2.3. Issue a follow-up for the CRN in Work Management to the appropriate Scheduler
- 1.2.4. Verify thorough completion of the CRN within 45 days.
- 1.2.5. Provide all necessary documentation to Stray Voltage Project Manager.

1.3. System Operator responsibilities:
- 1.3.1. Assign a response crew to the CRN.
- 1.3.2. Determine the crew response time and contact the Contractor Coordinator for coordination of guard requirements.
- 1.3.3. Obtain the required technical support, personnel or equipment necessary to provide resolution if the crew cannot make safe the Level I voltage or condition.

1.4. Response Crew responsibilities:
- 1.4.1. Respond to investigate the Level I voltage or condition.
- 1.4.2. Investigate the structure to identify the source, implement corrective action, make it safe or de-energize the source.
- 1.4.3. Perform a Stray Voltage Test before leaving work site.

2. Immediate Response Notification (IRN) - Level II Voltage ($4.5 \leq V_{Resistor} < 8$ VAC) or Condition

2.1. Tester responsibilities:
- 2.1.1. Contact the Contractor Coordinator to determine if the structure requires guarding and initiate the IRN.
- 2.1.2. Record the IRN and notification time into the stray voltage database.

2.2. Contractor Coordinator responsibilities:
- 2.2.1. Determine if a Guard is required and if so, coordinate the replacement of the tester.
- 2.2.2. Initiate notification request to a System Operator for a Response Crew to identify the source, determine whether or not the voltage ordinarily exists and, if the source can be corrected, implement corrective action.
- 2.2.3. Verify thorough completion of the IRN.

2.3. Response Crew responsibilities:

2.3.1. Respond to the Level II voltage or condition.
2.3.2. Investigate the IRN to identify the source, determine whether or not the voltage ordinarily exists, and, if the source can be corrected, implement corrective action.
2.3.3. Perform a Stray Voltage Test before leaving work site.

3. No Response - Level III Voltage (0 VAC ≤ $V_{Resistor}$ < 4.5 VAC) or Condition

3.1. Tester responsibilities:
3.1.1. Enter the measurement or condition in the stray voltage database.

3.2. Contractor Coordinator responsibilities:
3.2.1. None.

3.3. System Operator responsibilities:
3.3.1. None.

3.4. Response Crew responsibilities:
3.4.1. None.

Performance Mechanism

Public Service Commission Performance Mechanism

In the Safety Order, as modified by the Order, the Commission adopted a performance mechanism that establishes acceptable parameters for the testing and inspection programs mandated by the Safety Order, and may be used to reduce a utilities authorized rate of return for failure to meet the parameters.

Utility's Annual Performance Targets

a) The annual performance target for stray voltage testing shall be 100% of all electric facilities and streetlights that must be tested. Facilities that are inaccessible and which pose no risk to public health and safety will not be considered in the determination of whether the target has been achieved.

b) Failure to achieve the annual performance target for stray voltage testing shall result in a rate adjustment of 75 basis points.

c) For the first year of stray voltage testing, the performance target shall be 100% of all streetlights and electric facilities served by underground utility systems. Failure to achieve this performance target shall result in a rate adjustment of 37.5 basis points.

d) The annual performance target for inspections shall be based on the percentage of the average number of electric facilities that must be inspected each year in order to comply with the five-year inspection cycle. That is, the target based on the one-fifth of the total number of the utility's electric facilities. The specific targets will be as follows:

    a. First year inspection goal 85% of annual target

    b. Second year inspection goal 90% of annual target

    c. Annual inspection goal thereafter 95% of annual target

    d. Fifth year inspection goal 100% of facilities to be inspected

e) Failure to achieve the annual performance target for inspections shall result in a rate adjustment of 75 basis points.

Certifications

In accordance with Section 7 of the Electric Safety Standards, the President or officer of each Utility with direct responsibility for overseeing stray voltage testing and inspections shall provide annual certification to the Commission that the utility has, to the best of their 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 publicly accessible electric facilities and streetlights, except those identified in this January 15, 2007, Report

- Inspected the requisite number of electric facilities

Following are the Stray Voltage Testing and Inspection Certifications for New York State Electric & Gas Corporation.

CERTIFICATION
[STRAY VOLTAGE TESTING]

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

Laura S. Conklin, on this 15th day of January, 2007, certifies as follows:

1. I am the Vice President, Technical Services of New York State Electric & Gas Corporation (the "Company"), and in that capacity I make this Certification for the annual period ending November 30, 2006 based on my knowledge of the testing program adopted by the Company in accordance the Public Service Commission's *Order Instituting Safety Standards*, issued and effective January 5, 2005 in Case 04-M-0159 (the "Order"), including the Quality Assurance Program filed by the Company with the Commission.

2. In accordance with the requirements of the Order, the Company developed a program designed to test (i) all of the publicly accessible Electric Facilities owned by the Company ("Facilities") and (ii) all Streetlights located in public thoroughfares in the Company's service territory ("Streetlights"), as identified through a good faith effort by the Company, for stray voltage (the "Stray Voltage Testing Program").

3. I am responsible for overseeing the Company's Stray Voltage Testing Program and in that capacity I have monitored the

Company's Stray Voltage Testing Program during the twelve months ended November 30, 2006 (the "Twelve-Month Period").

4. 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 Twelve Month Period. Except for untested structures that are identified as not required or inaccessible in the Company's Annual Report, submitted herewith, the Company is unaware of any Facilities or Streetlights that were not tested during the Twelve-Month Period.

5. 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 Streetlights 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 Streetlights were known to exist or reasonably expected to be found.

Laura S. Conklin
Laura S. Conklin
Vice President, Technical Services

CERTIFICATION
[INSPECTIONS]

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

Michael H. Conroy, on this 15th day of January, 2007, certifies as follows:

1. I am the Vice President, Operations of New York State Electric & Gas Corporation (the "Company"), and in that capacity I make this Certification for the annual period ending November 30, 2006 based on my knowledge of the inspection program adopted by the Company in accordance the Public Service Commission's *Order Instituting Safety Standards*, issued and effective January 5, 2005 in Case 04-M-0159 (the "Order"), including the Quality Assurance Program filed by the Company with the Commission.

2. The Company has an inspection program that is designed to inspect all of its electric facilities on a five-year inspection cycle, as identified through a good faith effort by the Company ("Facilities"), in accordance with the requirements of the Order (the "Facility Inspection Program").

3. I am responsible for overseeing the Company's Facility Inspection Program and in that capacity I have monitored the program during the twelve months ended November 30, 2006 (the "Twelve-Month Period").

4. I hereby certify that, to the best of my knowledge, information and belief, the Company has completed its Facility Inspection Program to inspect the requisite number of its Facilities during the year 2006, in order to comply with the five-year inspection cycle required under the Order.

Michael H. Conroy
Vice President, Operations