

Energy Center Pittsburgh LLC 111 South Commons Pittsburgh, PA 15212 (412) 231-0409

January 18, 2019

Ms. Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street – 2nd Floor – Room-N201 Harrisburg, PA 17120

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Re: Energy Center Pittsburgh LLC ("ECP") Customer Education and Information Program

L-2015-2498111

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is a detailed summary of NRG Energy Center Pittsburgh's Customer Education and Information Program ("CE&I Program") as required by Title 52, Chapter 61.46 of the Pennsylvania Code.

Included with this filing are representative samples of descriptive literature that ECP may distribute to customers during implementation of the CE&I Program.

Consistent with the aforementioned regulations, a copy of ECP's Customer Education and Information Program has also been filed with the Pipeline Safety Division of the Commission.

Thank you for your attention to this matter, and please let us know if you have any questions regarding this filing.

Sincerely,

Clifford E. Blashford Vice-President, General Manager Energy Center Pittsburgh LLC

Enclosure

Cc: Paul Metro, Pipeline Safety Division, PA Public Utility Commission Cc: David P. Zambito, Cozen O'Conner

ENERGY CENTER PITTSBURGH LLC ("ECP")

STEAM DISTRIBUTION SYSTEM

POLICIES, PROCEDURES AND PLANS

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CHAPTER 4 – CUSTOMER EDUCATION AND INFORMATION PROGRAM

Rev. 01/18/2019

Section: 4.1 Customer Education and Information Program Details

Purpose:

Establish and maintain a program of customer education and information designed to assist ECP customers and appropriate governmental organizations to recognize steam emergency conditions and situations used to notify ECP of these emergency situations.

General:

- a) On an annual basis, ECP shall distribute steam safety brochure to all customers or similar publication, in their monthly invoice or separate correspondence, containing content relevant to steam system safety practices, recognition of steam emergency conditions and recommended actions.
- b) On an annual basis, provide updated emergency contact information to all customers and appropriate government organizations. Information will be included in regular monthly invoice, or separate correspondence.
- c) ECP shall list contact phone number(s) for customer use during normal business hours as well as 24-hour emergency use in the local telephone directory as well as on the ECP website.
- d) ECP shall provide other updates, when appropriate, through written or electronic means, regarding relevant steam system outages, significant steam system projects, and other issues that may impact customer service. Such information may be included in a targeted mailing to a subset of impacted ECP customers, or in broadly distributed communication, such as a marketing brochure or newsletter, for system wide distribution and benefit.
- e) During January of each year, ECP shall file with the Commission's Secretary and the Pipeline Safety Division a current description of its education and information program, including a detailed statement of the means of its implementation and samples of all description literature and other education aids.

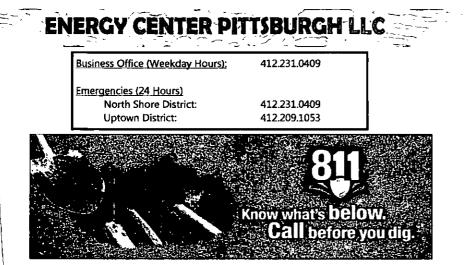
<u>References:</u> ECP web address: https://www.clearwaythermal.com/projects/pittsburgh/

Attachments:

4.1.1 - Energy Center Pittsburgh – Annual Safety Brochure (Sample)

4.1.2 - NRG Energy Center Pittsburgh – Newsletter dated September 2017 (Sample)

APPROVED ERAL /PLANT MANAGER



Seven days a week, 24 hours a day. This toll free call will help protect you, your family, and your neighbors. www.call811.com

TAMPERING WITH OUR EQUIPMENT IS ILLEGAL

It also creates operating risks and potentially dangerous conditions. Please notify us at contact numbers above if you observe a dangerous condition or suspect tampering.

Thanks for your cooperation!

<u>To ensure the highest levels of safety, service, reliability, and security,</u> <u>We work with emergency responders and governmental agencies to provide</u> <u>the most expedient and effective response to emergencies.</u>

> <u>This is achieved through intensive training, periodic drills,</u> <u>and close collaboration with first responders.</u>

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PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

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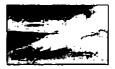
September 2019

OUR COMMITMENT TO SAFETY

Energy Center Pittsburgh's steam distribution system is a critical component of the City's energy infrastructure. This system supplies heating to many of Northside's largest buildings. Steam is one of the cleanest and greenest forms of energy available today and, when used properly, one of the safest.

We continuously monitors and inspects its steam system to ensure public safety. We encourage you to take an active role in helping us keep our system safe. Please be alert to questionable activities happening near our facilities and equipment. If you see something suspicious, call 911. If you see evidence of a steam

leak on the streets, please call us right away. Steam is caused by a steam leak or water falling on a steam pipe or manhole cover. We will need to investigate promptly. To avoid potential injury, do not waik on the manhole cover or through the steam.



Periodic Testing of Steam Traps

STEAM SAFETY

WHAT YOU NEED TO KNOW

During routine maintenance, we recommend that you inspect your traps, strainers, and drip legs for the presence of corrosion products. This will give you an indication as to whether the accumulation of corrosion products is a problem in your system.

While it is not unusual to find small amounts of corrosion products inside steam equipment, a significant accumulation of corrosion products can interfere with the proper operation of steam traps. Steam traps perform the critical function of removing condensate (water) from steam pipes.

Picture to the left indicates a possible steam leak venting out of a manhole. If corrosion products interfere with the proper operation of steam traps, condensate (water) can accumulate in the steam pipes and cause water hammer. 11

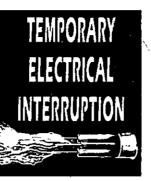
A common type of water hammer occurs when slugs of condensate impact the steam pipes causing loud banging noises.

Severe water hammer can cause steam pipes or fittings to fail. This is a dangerous condition that can cause equipment damage and personal injury. Observance of water hammer should be addressed and corrective action taken immediately.

Out staff can provide valuable assistance to help you investigate and eliminate such occurrences.



In the event of an electric service interruption where condensate-removal pumps are involved, customers should consider isolating their steam service at the house valve to prevent condensate receivers or sumps from overflowing and flooding mechanical equipment rooms.



PARDON THE INTERRUPTION

Occasionally, we may have to interrupt your service to make repairs to the steam distribution system. If this happens, Energy Center Pittsburgh will notify you in advance of the outage.

MAINTENANCE RESPONSIBILILTY

Energy Center Pittsburgh is responsible for supplying and maintaining steam lines and traps up to the customer curb. The line from the curb into the facility is the responsibility of the customer with the exception of the meters and some large customer reducing stations.

HOW TO AVOID DELAY IN SERVICE TURN-ON

(After Repair)

If you plan to change or modify your steam pipes; replace pressurereducing valve(s) or your meter station; change pipe flange(s), perform any repair requiring welding; make changes in dilution or flash tanks, pipe anchorage, pipe guides, expansion devices, or trap locations, you need notify NRG about the scope of your plans—before any work begins. At your request, we will arrange to shut off your steam service.

UNATTENDED OPEN DRAIN VALVES

Never leave opened drain valves unattended during a scheduled or unscheduled steam outage. This is critical because steam service will be restored as soon as the street work is completed and an open drain valve may allow excessive steam flow and unsafe conditions during the start-up process.

INSIDE STEAM SERVICE VALVE (CUSTOMER OWNED)

The inside steam service valve is the first valve in the building. This valve should **NEVER** be operated unless it is an emergency. Improper operation of this valve can cause a steam pipe rupture, which can result in serious injury and property damage. If the inside steam service valve has to be closed in an emergency, **NEVER** reopen this valve. Notify NRG so we can make arrangements to safely drain the service piping before we can restore steam service to your premises.

SEASONAL SERVICE TURN-ONS/TURN-OFFS

To avoid delay, please notify us at least two weeks before your desired turn-on/turn-off date so that we may provide timely service.



Steam Pipe

Maintenance

Regular inspections by a qualified operator or heating contractor will help keep your steamplpe system operating safely and efficiently. Here are some things you, your operators, and your contractor should be aware of:

- Keep vent lines from condensate collection vessels, such as a dilution or flash tank, clear and unrestricted to prevent pressure from building up.
- Seasonal customers should make sure that your steam equipment is thoroughly inspected before turning it on. All inspections, adjustments, and repairs to your steam-pipe system must be performed by a qualified operator or heating contractor.
- Make sure that pipes are properly insulated. Insufficient pipe insulation causes excessive heat loss.
- Do not use leak sealant because it may enter the pipe system and clog the traps and sensing lines.

If you need to make changes:

If you plan to increase or decrease your building load or make any changes to your steam system, you are required to give NRG reasonable advance notice before beginning any work. We will work with you to ensure you receive the proper interconnection specifications and check that your metering remains accurate.

How to Avoid Condensate Build-up

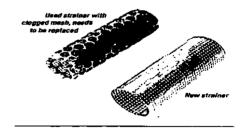
To ensure safe and reliable steam system operation, condensate-removal equipment, such as steam traps and drain valves, must be installed at appropriate points in your steam system. A qualified operator, heating contractor, or consulting engineer can determine whether your steam traps, drain valves, and drip legs are properly installed. Steam traps automatically remove condensate from the pipe system. To ensure safety and reliability, check all steam traps regularly to make sure they are working properly. Drain valves are used to remove condensate from lines before turning on the steam after there has been an extended outage.



Thermodynamic steam trap

TRAP INLET AND TRAP OUTLET VALVES

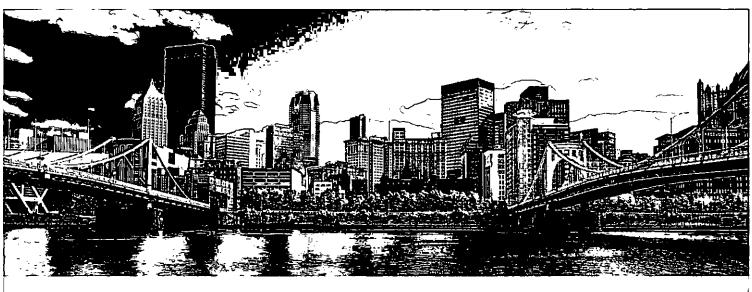
The trap inlet and trap outlet valves on steam traps, which are upstream of the meters, must remain open to avoid the accumulation of condensate, which can lead to a water hammer condition (pressure surge or wave caused when fluid in motion is forced to stop or change direction suddenly).



Asbestos abatement must be performed in compliance with the federal, state, and city environmental rules and regulations.

September, 2017





Our commitment to Pittsburgh is enduring - and visible.



Clifford Blashford Ganaral Manager NRG Energy Center Pittsburgh

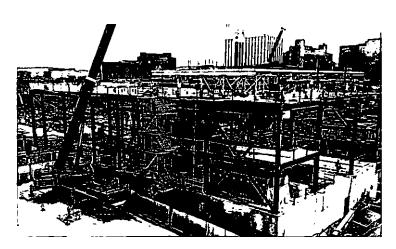
RECEIVED JAN 1 8 2019 PA PUBLIC UTILITY COMMISSION SECRETARY'S BUREAU

Greetings from your NRG Energy Center Pittsburgh team. The very nature of our business – providing district heating and cooling to Pittsburgh-area businesses via an underground network of pipes – means our value lies in working behind the scenes. In other words, not being noticed is a good thing.

Right now, however, we're in the middle of a project that is very noticeable. We're building a brand-new district energy facility to serve Pittsburgh's Lower Hill and Uptown areas. In the district energy world, construction of a new plant doesn't happen often. So it's an exciting time. More exciting is the impact our new system will have on accelerating growth to a revitalized area of the city. As this area takes shape, we'll be right there to serve it – efficiently, reliably and effectively – the same way our North Shore facility has served Allegheny General Hospital, PNC Park, Carnegie Science Center and dozens of other buildings for more than 50 years, dating back to a time before we took over operations.

As you drive down Fifth Avenue just east of PPG Paints Arena and look north, you'll see the construction activity. I invite you to do that now. By this time next year, the heavy construction equipment will be gone. the new Uptown plant will be in operation and we'll be back to our normal, unobtrusive, quietly efficient way of doing business. And that's the best thing of all.

Pittsburgh News



Pittsburgh's story is our story. too.

Groundbreaking for our new district energy center in Uptown took place on March7. **Everyone loves a comeback story.** In Pittsburgh, the emerging story taking shape in the Uptown area of the city qualifies. But every comeback story needs a catalyst, and we're proud that our new district energy center, currently under construction, represents a significant chapter. It will provide the infrastructure for efficient heating and cooling to buildings in the area, one of those vital services that underpins any city's revitalization efforts.

As developers look to bring new ideas and buildings to an existing area, having an underground network to tap into frees up all kinds of possibilities. Not only is heating and cooling provided efficiently, but by not having to build, house and operate their own boilers and chillers, architects can gain flexibility, improve overall aesthetics and reduce costs.

In addition to our plans to serve the revitalized Lower Hill Development, we are pleased to provide steam, chilled water and emergency backup power to our anchor customer, the University of Pittsburgh Medical Center's Mercy Hospital. Of course, the beauty of district energy is that many buildings can become part of the system. We look forward to seeing how this entire area of downtown evolves – and being a big part of the story as it happens.

Energy News

Sustainability in energy takes many forms. That idea came through in many ways at this year's annual International District Energy Association (IDEA) Conference & Trade Show, held in June in Scottsdale, Arizona. Of course, spending four days in the desert in the summer is likely to mean hot weather, and the Phoenix experience didn't disappoint, with temperatures exceeding 115 degrees.

Besides serving as the event's host, NRG Energy Center Phoenix also was responsible for keeping guests cool, a mission reflected in our theme for the week: "Keep Cool and Carry On with NRG." But the main topic was sustainability. Jim Lodge, vice president NRG Thermal, shared wide-ranging thoughts on the subject during the opening discussion. Among them:

- District Energy (DE) is an effective and growing solution as the world seeks to reduce carbon emissions while also keeping people and buildings cool:
 - By 2030, 70% of Dubai will be connected to DE
 - Tokyo is expanding DE in preparation for hosting the 2020 Summer Olympics
 - China is looking to DE as they also look to reduce coalfired boiling

- Singapore's space and resource constraints are making DE a viable option as the nation deals with growth
- DE also means reliable energy a growing benefit as extreme weather events become more frequent and the value of resilient systems gains importance.
- DE's emerging opportunity involves taking waste heat and turning it into a resource for heating and cooling. This can become an economical second-tier supply strategy.



What happened in Phoenix. goes beyond Phoenix.

Safety

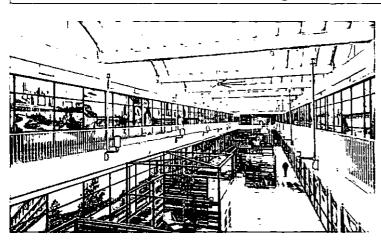
Safety is a commitment that our team and the businesses we serve can all benefit from. Here are 10 simple tips that have a proven impact in reducing slips and falls in the workplace:

- · Use signage to alert workers of freshly mopped floors
- · Keep frequently used items in easily reachable areas
- · Wear shoes with good support and slip-resistant soles
- Arrange traffic patterns to provide open walking pathways
- Remove debris from exterior walkways
- Adjust gutters and downspouts to drive water away from pathways
- Install handrails on all staircases on both sides
- · Ensure adequate lighting both indoors and outdoors
- Check the condition of walkways and steps regularly
- · Never stand on a chair, table or other surface with wheels



Keeping Pittsburgh safe

Source: National Safety Council



What's old is new again

Our district system is designed to evolve as our customers evolve or, in the case of Allegheny Center Mall, completely reinvent themselves.

One of the most fulfilling aspects of our role as an energy provider in Pittsburgh is the range of customers we support. No two are alike, and even individual customers can evolve in compelling ways or completely reinvent themselves, like Nova Place, formerly Allegheny Center Mall.

Supporting Sustainable Development

Built in the mid-1960s, the 1.2 million-square-foot complex had become a symbol of an outdated retail approach, not just in Pittsburgh but across the country.

Enter Faros Properties, a real estate investment firm with a plan that has transformed the property, turning it into Nova Place, a reimagined campus for high-tech companies. Struggling retailers have been replaced with new and emerging businesses – many of them high-tech related. Workers brainstorm, interact and create in an open environment that encourages collaboration. Bistros and coffee shops add to the entrepreneurial spirit.

What hasn't changed is our ability to serve the customers with an efficient, reliable and cost-effective district energy system that keeps the facility warm in the winter and cool in the summer.

New concept. Pittsburgh success story. And behind it all, an enduring heating and cooling system. That's an efficient approach to redevelopment on several levels.

Real-World Perspectives



Customer Spotlight Allegheny General Hospital's vital healthcare mission to the city's North Side dates back to its founding in 1882. Nowhere is the need for efficient and reliable energy more important than in the healthcare industry. In Pittsburgh, one of our longest-running stories involves Allegheny General Hospital, a central part of the growing Allegheny Health Network. The hospital has been a fixture for many years in the city's North Side area and an ongoing partner with NRG Energy Center Pittsburgh. Relying on us for heating and cooling allows the hospital to focus on its mission of exceptional patient care. With no space needed for a heating and cooling infrastructure of its own, it has more space for labs, examination rooms and beds. Behind all this is our reliability record, especially reassuring given the hospital's vital, 24/7 mission.





Employee Spotlight

The human side of NRG is an important aspect of our story. Recently, John Kraemer, sales and marketing Director of the NRG Energy Center Pittsburgh, became part of our 20+ member team. John arrived in January with 35+ years of energy experience in regulated and unregulated markets in Pennsylvania. His specific role is as the primary contact for existing and potential customers, working to manage all relationships and business development for our two Pittsburgh facilities. He's a University of Pittsburgh graduate (electrical engineering), a registered professional engineer and AEE Certified Energy Manager.

Consider John your point person for any questions and comments. He can be reached at 1-412-334-9712 or john.kraemer@nrg.com.

Community Presence

We believe our role in Pittsburgh goes beyond energy. Community involvement is also important. Last May, eight members of our team volunteered to plant flowers as part of a Western Pennsylvania Conservancy neighborhood beautification project. The NRG team provided hours of "energy" to plant flowers, landscape, mulch and spruce up the corner intersection of Brighton Road and West North Avenue, located within NRG Energy Center's North Side community. Proof that "green energy" can express itself in many positive ways.

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