



**Orange & Rockland**  
a conEdison, inc. company

Orange and Rockland Utilities, Inc.  
390 West Route 59  
Spring Valley NY 10977-5300  
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December 1, 2011

Honorable Rosemary Chiavetta  
Secretary  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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**Re: Natural Gas Pipeline Replacement and Performance Plans  
Order of November 10, 2011  
M-2011-2271982**

Dear Secretary Chiavetta:

Pursuant to your letter dated November 21, 2011 in the above-referenced proceeding, Pike County Light & Power Company ("PCL&P") hereby submits its comments relating to Frost Patrols. Specifically, PCL&P comments on the following questions set forth in your letter:

2. Each natural gas distribution public utility and city natural gas distribution operation with cast iron pipeline or unprotected steel pipeline in its systems shall file comments on Frost Patrols. The comments shall include:

- a) A full description of the utility's prior Frost Patrol protocols over the five (5) winter seasons preceding its DIMP/IM Plans;

**Response: Please see PCL&P's response to subpart b below. PCL&P has followed this procedure over the past five winter seasons.**

- b) A full description of the utility's current Frost Patrol protocols under its DIMP/IM Plans (if different from above);

**Response: PCL&P's Distribution Integrity Management Plan ("DIMP")<sup>1</sup> recognizes frost as a threat to the Cast Iron system (see pp. B-3) and addresses the threat (see pp. D-6) with specificity with the leak surveys that PCL&P has and will continue to conduct as outlined in PCL&P's Procedure GSOM 406-1 as follows:**

<sup>1</sup> Copies of the cited pages from PCL&P's DIMP and Procedure GSOM 406-1 are attached as Exhibit A to this letter.

### Purpose

*During extended periods of extreme cold temperatures, underground frost heaving and subsequent thawing can cause cast iron mains to crack and leak. This guideline is to assist Gas Operations in determining the need to schedule high speed patrols of the low pressure cast iron system during these conditions. These patrols are done at speeds greater than when performing a leak survey because the intent is to detect cracks/ breaks on the cast iron system in an expeditious manner.*

*High speed means going at a speed greater than the typical leak survey but not to exceed the maximum operating speed of the detection instrument (approximately 5-10 mph).*

### Decision Criteria

*A high speed cast iron main patrol should be initiated when any one or more of the following conditions exist:*

- *When the ambient high temperature has remained at 32<sup>0</sup> F. or lower for seven or more consecutive days as tracked by Gas Technical Services.*
- *Field verified frost depth conditions of 24 inches or greater exist.*
- *If a frost survey was initiated for either of the two criteria above and a sudden thaw occurs that same season with daily temperatures above 45<sup>0</sup> F. for more than two consecutive days.*
- *Three or more cast iron main cracks occur on the system in one day.*

### Go/No-Go Decision

1. *Using the above criteria, the Gas Operations Sections Manager(s) or Director of Gas Technical Services recommends to the Director of Gas Operations to begin a high speed patrol.*
2. *The Director determines the patrol's start/stop dates and notifies the Gas Maintenance Supervisors.*
3. *The survey will continue until all 8" and smaller cast iron mains are surveyed.*
4. *Based on ongoing weather conditions, the Director may recommend continuing the survey beyond the one complete survey of the cast iron system.*

### Operating Area and Inter-Utility Coordination

1. *Gas Maintenance Departments (East and North) are responsible for having on-hand the required 8" and smaller cast iron maps within their division.*
2. *The Director will communicate with Con Edison Leakage Survey during these periods to compare what they are doing in Westchester.*

- c) A full description of enhanced Frost Patrol Protocols the utility proposes to perform this winter; and

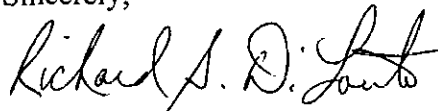
**Response: PCL&P proposes to perform a frost survey of its cast iron and bare steel systems once per month from November 1 through April 30. Additionally, PCL&P will continue its high speed surveys based on temperature and frost depth as outlined in Procedure GSOM 406-1. PCL&P estimates that this monthly survey will require approximately 40 man-hours to complete/month at a monthly cost of \$6,000, for a total of \$36,000 annually.**

- d) A discussion about whether Commission issued standards for Frost Patrols should be considered going forward, and whether such standards should be determined on a utility by utility basis or on an industry wide basis.

**Response: PCL&P agrees that discussions should be scheduled to discuss these Commission issued standards. Given the various differences among the Commonwealth's natural gas distribution utilities, (e.g., urban – suburban - rural, customer demographics, age and condition of infrastructure) it is self evident that no two natural gas distribution utilities are alike. PCL&P recommends that, in light of the differences existing among the natural gas distribution utilities, the standards should be implemented on a utility by utility basis.<sup>2</sup>**

Thank you for the opportunity to submit these comments. Please contact me if you wish to discuss any of the matters discussed above.

Sincerely,



Richard S. Di Loreto  
Director – Gas Technical Services

Cc: Paul Metro (via email)  
Robert Young (via email)

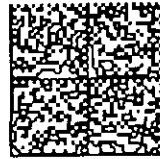
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<sup>2</sup> If the PAPUC determines to implement the Standards on a uniform Commonwealth-wide basis, the Commission will need to comply with all applicable procedural requirements (e.g., hearings).



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