

January 30, 2024

Via Email

Mona Sehgal, Associate Commissioner and General Counsel
NYC Department of Buildings
280 Broadway
New York, NY 10007

Re: NYC Department of Buildings Course Provider Rule Proposal Comments

Consolidated Edison Company of New York, Inc. ("Con Edison" or the "Company") submits these comments to the New York City Department of Buildings ("NYCDOB") regarding the recently issued Course Provider Rule Proposals.

Con Edison is a New York city-based local distribution company ("LDC") that provides natural gas to more than one million customers in New York City and Westchester County. Con Edison's gas delivery system includes more than 4,300 miles of gas mains and approximately 377,000 service lines, with approximately one million inside meter sets. With such a large population of inside meter sets, Con Edison is uniquely positioned to regularly work with customers' plumbers on both the Company's jurisdiction piping and the portions of the customer's service regulated by NYCDOB.

Con Edison is a founding member of the Gas Safety Joint Trades ("GSJT's") group for which the Northeast Gas Association ("NGA") submitted written comments. The GSJT is comprised of Con Edison, National Grid, the NGA, GTI Energy, the plumbing trades of New York City represented by The Plumbing Foundation of New York ("PFCNY"), The Master Plumbers Council ("MPC") and UA Plumbers Union Local No. 1 Trade Education Training Center of New York City, along with representatives from the Westchester County plumbing community. The GSJT Collaborative in coordination with NYCDOB and the New York State Department of Public Service ("NYDPS") has led the industry in developing gas safety training and qualification programs specifically focused on supplementing existing gas training and certification programs required of Licensed Master Plumbers ("LMP's").

This program allows for those participating plumbers to be trained and Operator Qualified per state and federal pipeline safety regulations to work on NYDPS jurisdictional gas lines, as well as provides essential training in accordance with the principles and practices required for Local Law 152, which has resulted in the Department-Approved Course Requirements: 7-Hour Periodic Gas Piping Inspector Qualification. This single program allows plumbers to work on both sides of the meter; whereas, other NYCDOB approved LL152 training programs do not.

This program has successfully trained, tested, qualified and manages approximately 2,000 plumbing technicians in over 750 individual LMP organizations. At the core of this training program is the education on what an Abnormal Operating Condition¹ ("AOC") is, numerous examples of AOCs, and

¹ Pipeline safety regulation and Con Edison's OQ Program define an abnormal operating condition as "a condition identified by the Operator that may indicate a malfunction of a component or deviation from normal operations that may: a. indicate a condition exceeding design limits; or b. result in a hazard(s) to person, property, or the environment".

how they should be reacted to. Not only are these AOCs to be reported to the NYCDOB via the LL152 required forms, but if an emergent issue is found, the plumbers are trained and qualified to identify the hazard and immediately report it to the applicable utility, so that an emergency response can take place. Since the inception of this program plumbers have reported leaks, theft of service, extreme corrosion and other critical AOCs to the Company, all of which was responded to and addressed before a serious issue arose. In 2024, Con Edison has responded to nearly 300 gas leaks reported to the Company by plumbers.

Critical to the structure and success of this program are the NGA and GTI Energy. The NGA is the region's leading Gas Safety Training and Operator Qualification Program Providers, for which Con Edison and the other NY based LDCs have adopted as the framework for their own compliance programs. GTI Energy is the nation's leading gas safety training developer, for which Con Edison has based its internal training programs on the GTI Energy training materials. During the adoption and implementation of Local Law 152, National Grid and Con Edison sponsored (aka- paid) the NGA and GTI Energy to develop comprehensive interior building gas piping safety inspection and abnormal operating condition ("AOC") mitigation training programs, specifically designed for plumbers.

In the case of the GSJT developed program described above, GTI Energy is the NYCDOB Registered Course Provider of record, and the NGA delivers the training program as an ICC Preferred Training Provider in conjunction with MPC and UA Plumbers Union Local No. 1 Trade Education Training Center of New York City. And as such, Con Edison is concerned that the NYCDOB's proposed enhancements to the current Course Provider Requirements may have significant unintentional consequences on this program, disallowing its usage going forward.

Con Edison understands and respect the intention of the proposed enhancements, to address unethical business practices of some "bad actors". Therefore, Con Edison supports the suggested revisions provided in the NGA's comments, which meet the intent of this proposal, whilst still allowing the above described GSJT program to not continue as the industry leading training and qualification programs to meet Local Law 152 and NYCDOB requirements.

Thank You,

/s/ Lauren Toczyłowski

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