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December 2, 2014  
By Overnight Mail

Benjamin T. Allen  
Assistant General Counsel  
National Transportation Safety Board  
Office of General Counsel  
490 L'Enfant Plaza East, S.W.  
Washington, D.C. 20594

Re: NTSB Investigation DCA14MP002

Dear Mr. Allen:

Pursuant to your request for copies of Con Edison's responses to information requests issued by the New York State Department of Public Service ("DPS") in its investigation of the explosion and collapse of the buildings at 1644 and 1646 Park Avenue, New York, New York on March 12, 2014, I am transmitting herewith Con Edison's response to DPS Set 14 – Question 67.

Con Edison's response to DPS Set 14 – Question 67 consists of a narrative response plus a variety of file attachments. A hard copy of the narrative response is enclosed. Three CDs containing the file attachments are also enclosed.

On December 2, 2014, I sent you an email containing the narrative response and stating that the file attachments to the narrative response are being sent to you on three CDs because these file attachments are voluminous and impractical to send by email.

Very truly yours,

Enclosures

Company Name: Con Edison  
Case Description: Investigation Into Park Avenue Building Explosion  
Case: 14-G-0201

Response to DPS Interrogatories – Set DPS - 14  
Date of Response:  
Responding Witness:

Question No. : 67

Subject: Outreach and Education - Please provide:

1. A copy of the Company's 2011 Public Awareness Plan (PAP) with all supporting documents/attachments/appendices and reports.
2. In a September 15, 2011 letter from the Company to Gavin Nicoletta of DPS, Con Edison provided a plan to address areas of non-compliance identified as part of DPS's review of the 2011 PAP. Please provide an update indicating that each of these areas of non-compliance has been fully addressed.
3. A copy of the last version of the PAP prepared before the March 12, 2014 incident at 1644 and 1646 Park Avenue, New York, N.Y.
4. Provide a description of the Company's purchase of outside media in 2013 and 2014 for the purpose of educating the public regarding natural gas safety. Include a list of media outlets used, message content, full budget and the schedule of announcements (frequency, flight time, etc). Please identify the distinctions between the Company's solo media program and the one the Company entered into in partnership with Northeast Gas Association.
5. A description of the natural gas safety related outreach materials included in the Welcome Package for new customers prior to the March 12, 2014 incident. Indicate whether any materials are provided in multiple languages.
6. A description of how gas safety outreach materials developed in multiple languages are distributed to customers. For gas safety materials provided through mailings/bill inserts, describe the process for identifying non-English speaking customers and provide multi-lingual materials.

RESPONSE: (do not edit or delete this line or anything above this)

1. The Company is providing a CD titled "Con Edison June 2011 PAP." Please see the file titled *CE Public Awareness Program June 2011* for the text of Con Edison's 2011 Public Awareness Plan. You may click on the hyperlinks within the appendices to

view supporting documents/attachments/appendices and reports. (The hyperlinks link to other documents that are included on the CD.)

2. Con Edison has fully addressed each of the areas of non-compliance identified in DPS's 2011 review of the PAP. Detailed updates are listed in the attachment titled *Response to PSC Public Awareness Program Audit – Updated Nov 2014*.
3. The Company is providing a CD titled "Con Edison 2014 PAP." Please see the file titled *CE Public Awareness Program 2* in the folder labeled "Con Edison Program" for the text of Con Edison's 2014 Public Awareness Plan, Revision B2, which initially went into effect before the March 12, 2014 incident at 1644 and 1646 Park Avenue. You may click on the hyperlinks within the appendices to view supporting documents/attachments/appendices and reports. (The hyperlinks link to other documents that are included on the CD.)
4. Con Edison contributed \$60,000 to the NGA Pipeline Safety Public Awareness Regional Media Campaign in both 2013 and 2014. The NGA's total budget was \$369,000 in both years. In the New York market, the NGA spent \$140,604 in 2013 and \$149,851 in 2014. The advertisements, which were used for television, radio, and online media outlets, covered three topics in both years: digging safely (e.g., "Call Before You Dig"), gas leak detection, and safety on gas pipeline right-of-ways. The advertisements are in the attached files *NGA\_dig\_safely*, *NGA\_leak\_detection*, and *NGA\_right\_of\_way*. Details on the media outlets used and schedule are available in the NGA's post-campaign reports, in the attached files *2013 NGA Post Campaign Report* and *2014 NGA Post Campaign Report*, which both contain bookmarks to the sections of the reports that speak specifically about the New York market and Con Edison.

The Company supplemented the NGA's cooperative media campaign with the annual Con Edison Gas Safety Public Awareness and Gas Safety Energy Education campaigns. The goal of the campaigns is to reach New York City and Westchester residents within the Con Edison gas service territory. The total 2013 budget was \$573,299, which consisted of \$538,616 for Gas Safety Energy Education and \$34,683 for Gas Safety Public Awareness. Topics covered in 2013 were: gas system reliability, signs of a gas leak and what actions to take if a leak is detected, and "Call Before You Dig." The total 2014 budget was \$3,642,695, which consisted of \$3,137,681 for Gas Safety Energy Education and \$505,014 for Gas Safety Public Awareness. Topics covered in 2014 include signs of a gas leak and actions to take once a leak is detected. The advertisements used in both campaigns are available in the attached file *CE Gas Safety Advertising Exhibit 1*. The communication schedule for each year is available in the attached file *CE Gas Safety Media Schedules 2013-2014*.

For additional details about both the NGA and Con Edison media campaigns, including a list of media outlets, please see the attached file *NGA and CE Media Campaigns*.



5. All new customers receive the “Welcome to Con Edison” brochure as an insert with their first statement (see attached file *Welcome to Con Edison*). Gas safety information appears on the left-inside panel, in the “What to Do if You Smell Gas” section which includes a link to Con Edison’s gas safety webpage. Currently, this brochure is only available in English.

New customers receive the “Natural Gas Safety” brochure, in either English or Spanish, in their second bill (see Con Edison PAP, Appendix C, section 1.10 – “Bill Insert”). This brochure includes comprehensive gas safety messaging including what to do if you suspect a gas leak, gas safety in the home, carbon monoxide safety, and “Call Before You Dig” information.

6. As described more fully below, Con Edison takes a multi-media approach to distributing gas safety information in multiple languages. Printed materials are one type of media used to communicate with customers, and with the public at large, about gas safety. To determine which customers should receive multi-lingual mailings and bill inserts, the Company relies on customers to self-identify when their primary language is not English. The self-identification process typically occurs at the time the customer establishes his or her account. Customers can also self-identify during any call to the Company’s customer service number, 1-800-75-CONED. Upon self-identification, a foreign language indicator, known as a FORC code, is applied to the customer’s account.

Gas safety information is distributed through Con Edison’s quarterly “Customer News” bill insert (see Con Edison PAP, Appendix E, section 2.1 for baseline activities and Appendix C, section 1.9 for supplemental activities). A Spanish version of “Customer News” is sent quarterly to the 307,000 customers who have been identified in the Company’s customer information system (CIS) as Spanish-speaking (see attached file *Customer News Summer 2014 (Spa)*).

The Company produces gas safety-related print and radio ads in five different languages: English, Spanish, Chinese, Korean, and Russian. A bilingual natural gas scratch-and-sniff bill insert is sent annually to all customers in Con Edison’s gas service territory (see Con Edison PAP, Appendix C, section 1.10 – “Scratch and Sniff”). Earlier this year, an e-mail campaign was developed in both English and Spanish and sent to all customers with an e-mail address on file. The Spanish version of the e-mail is in the attached file *Reporte el olor a gas*.

A newly redesigned peel-and-sniff gas safety bill insert (see attached file *Peel Sniff Insert*) was produced following the March 12, 2014 incident, which now includes a language block in Spanish, Chinese, Korean, Russian, and Haitian Creole, and directs speakers of those languages to find more gas safety information on the [coned.com/gassafety](http://coned.com/gassafety) website. This site includes electronic copies of the “Natural Gas Safety” brochure and a “Smell Gas, Act Fast” video (see Con Edison PAP, Appendix C, section 1.5), both of which are provided in English, Spanish, Chinese, and Korean.

The main gas safety message on the page can be translated into 80 languages using Google Translate's free translation service.

Foreign language editions of the "Natural Gas Safety" brochure were mailed to elected officials earlier this year with the expectation that they would share this important safety information with their constituents.

Following the March 12, 2014 incident, Con Edison introduced new gas safety print advertisements to communicate that the public may call 911 if a gas leak is detected, and that it can be done anonymously. The advertisements appeared in multiple languages in ethnic and major daily newspapers, as well as outdoors, on subways, and on the radio as part of the annual Energy Education campaign (see attached file *CE Gas Safety Advertising\_Exhibit 1*). Citywide and community-based media partners, including radio and print outlets, are supporting Con Edison's efforts to deliver the gas safety foreign language videos to ethnic communities. More than thirteen ethnic publications and eight foreign language radio stations have posted links to Con Edison's multilingual videos on their websites. Five of the radio stations have also posted social media messages linking followers to the videos on Con Edison's website. Con Edison used social media to further extend the reach of the multilingual videos by promoting them on the Company's Twitter and Facebook pages, and encouraging the public to share them on their own pages (see attached file *CE Gas Safety Social Media\_Exhibit 2*).

Con Edison collaborated with the City of New York's Department for the Aging, and with the Company's nonprofit partners, to display multilingual gas safety posters in more than 100 senior centers, libraries, and community centers (see attachment *Smell Gas Poster*). The Company also posted multilingual safety messaging in laundromats and at check cashing stores. Gas safety information is also displayed in English and Spanish at the Company's six customer walk-in centers.

Finally, gas safety information is distributed in multiple languages at over 85 community events staffed by the Company each year and is available at no charge upon request (see Con Edison PAP, Appendix C, section 1.3).