



An Exelon Company

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VIA HAND DELIVERY

Mr. John J. Clementson, II
Assistant Chief Engineer – Pipeline Safety
Maryland Public Service Commission
6 St. Paul Street, 19th Floor
Baltimore, Maryland 21202-6806

Re: Status Report on Gas Meter Mitigation/Protection Program

Dear Mr. Clementson:

Pursuant to Baltimore Gas and Electric Company's ("BGE" or the "Company") March 31, 2016 letter response to a Notice of Probable Violation ("NOPV") dated February 24, 2016, concerning a gas incident at [REDACTED] in Columbia, Maryland, BGE is to provide you with a status report each April 1, beginning in 2017, of BGE's program to verify gas service installation conditions and undertake meter relocation and protection actions where necessary. Please accept this status report as BGE's satisfaction of the reporting obligation for 2019.

Background

On February 24, 2016, BGE received a NOPV from the Maryland Public Service Commission Engineering Division ("PSCED") regarding an inspection performed in the wake of a natural gas explosion that occurred at [REDACTED] in Columbia, Maryland. The NOPV detailed that an explosion occurred after a car struck natural gas piping inside a garage as the car was being backed out of the garage with its door open. In response to the NOPV, BGE and the PSCED agreed through a letter that BGE would conduct a five (5) year program to identify and protect gas meters.

In the weeks and months following the execution of the letter response, personnel from BGE's engineering, customer outreach, gas design, gas standards, legal, and government affairs departments met with Company leadership to determine and develop a plan consisting of the best methods to address the Company's gas service protection requirements, provide adequate protection to gas meters, and communicate plans to stakeholders, including state and local elected officials, customers, the PSCED, and the Maryland Public Service Commission's

Consumer Affairs Division (“PSC CAD”).¹ As part of this process, BGE reviewed its own Metering Standards, and examined nationwide trends in the gas delivery industry regarding how to best protect gas service meters. BGE discovered that the industry trend and a best practice nationwide is to relocate gas meters outdoors to improve safety and meter accessibility. BGE amended its Metering Standards to reflect that all new residential construction must have gas meters located outside, and in no event shall meters be located inside garages. Exceptions to this standard are only permitted when there is no outside location available, or when a proposed outside location would extend the metering beyond the customer’s property line, into a public right of way, or would violate the local jurisdiction’s requirements.

After developing its plan, BGE shared details with the PSCED and the PSC CAD, including at a November 7, 2016 meeting with PSC CAD officials whereby BGE explained its plan and scope of work to address meter safety through actions including relocating meters from inside garages to outside of homes, and protecting meters already on the outside of homes but in close proximity to vehicular passageways such as driveways with concrete-filled steel bollards. BGE also provided PSC CAD with details on BGE’s planned geographic progression for relocating and protecting meters throughout the Company’s gas distribution service territory, a timeline for the project, copies of all correspondence to be sent to customers regarding the program, and plans for how BGE would respond to customers who resist or refuse meter relocation and protection efforts.

As detailed below, BGE continues to implement the gas meter mitigation/protection program and is making good progress thus far.

Program Status Report

Since December 15, 2016 Precision Pipeline Solutions (“PPS”) has been the contractor assisting BGE with the program. BGE and PPS developed a process by which customers are notified of the planned meter mitigation work, and appointments are scheduled to survey properties to determine whether meter relocation, meter protection, or both, are needed to adequately address safety concerns. Following the property survey, the meter protection work is performed on a separate date. BGE targets a staggered 120 day timeline for notifying customers and performing the necessary work in a timely manner that keeps work crews occupied yet does not overwhelm communities where work is taking place.

For situations where meter accessibility and customer response become an issue, BGE and PPS attempt at least one daytime door knock and leave a door hanger at the property and at least two calls to the phone number on record as being associated with the customer account, provided that the phone number is still in service. Continued failure by the customer to respond to inquiries results in BGE implementing its standard Meter Accessibility Program (“MAP”) protocol, consisting of a first letter sent to the customer and/or property owner, followed by multiple calls/emails, the sending of a termination letter/email, and a separate termination letter sent via certified mail to the customer and property owner. Additionally, one final call attempt is made before a termination order is issued for BGE’s work crews. In all cases BGE’s legal and

¹ The PSC CAD was formerly known as the Office of External Relations.

public affairs departments are consulted and the PSC CAD is informed before the issuance of a termination order.

BGE has to date identified 743,891 total gas service points across its gas distribution service territory to be reviewed further for work eligibility. Of these gas service points, BGE has identified the following categories of gas service points as of March 27, 2019:

Gas Service Point	Number
Bollard Installation Only	6,200
Meter Relocation and Bollard Installation	3,300
No Work Needed (meter not inside garage and/or bollard not necessary)	558,762
Service Points to be Reviewed (via leak survey process)	175,629

Although there are service points still to be reviewed through the leak survey process, at this point nearly all high density, high consequence area service points have been identified. Of the meters identified as needing to be relocated outside and protected with bollards, 85% are located in townhome communities spread across the BGE gas distribution service territory. In addition, BGE identified approximately 4,200 outdoor gas meters in townhome communities that are exposed to vehicular traffic and will require bollard protection. Finally, BGE estimates as many as 2,000 outdoor meters at non-townhome standalone structures may be exposed to vehicular traffic and could require bollard protection, but actual numbers will be derived through the leak survey process in the coming years.

BGE began notifying customers in January 2017 of the necessary meter protection work, with the first jobs occurring in March 2017. The first targeted areas for the meter protection work were communities in the Odenton/Gambrills/Crofton area of Anne Arundel County. Over the summer 2017 months, work began in the Riva/Edgewater/Annapolis areas of Anne Arundel County, and then moved into northern Anne Arundel County, Laurel and southern Howard County for the remainder of 2017. In 2018 the program expanded into the areas of Howard County, Carroll County, Harford County, Baltimore County, and Baltimore City. Plans for 2019 include completing work needed throughout the entire BGE service territory. As of March 27, 2019, BGE has completed 2,073 combined meter relocation and bollard install jobs 3,749 bollard install-only jobs, and 537 meter relocation-only jobs. By the end of 2019, BGE expects to have completed 3,300 meter relocations, and 9,500 bollard installations.

Outreach to State/County Officials and Impacted Communities

As part of the meter protection program, BGE conducted extensive outreach with necessary State and county officials, including State lawmakers representing Anne Arundel County, the City of Laurel, Howard County, Carroll County, Harford County, Baltimore County and Baltimore City, and the Anne Arundel County Executive and Council members. Additionally, BGE made presentations to officials of homeowners associations and community groups in the areas where the meter protection work has or will be taking place. Outreach efforts included hosting town-hall meetings to answer questions and concerns, and scheduling individual meetings to describe the work process and the need to protect the meters. BGE to date

has found the outreach efforts to be productive and worthwhile, with audiences appreciating the information on the scope and expected impact of the meter protection work. BGE will continue to seek improvements in the meter relocation process to enhance customer response and satisfaction, including taking suggestions from customers and elected officials during town hall and community association meetings.

Customer Non-Response/Complaints

Overall, BGE and PPS have had good success in identifying work locations and scheduling meter protection work with customers. Nevertheless, there have been a number of customers who have not responded to repeated inquiries from BGE and PPS, as well as customers who have responded but questioned the need for the work and/or have refused to allow BGE and PPS to perform the work. As of March 27, 2019, 1,659 customers have been placed in BGE's MAP protocol and 62 customers have had gas service terminated due to failure to schedule meter protection work. Of the 62 customers that have had gas service terminated, 56 have had meter protection work completed and gas service restored, one has had gas service restored without protection work being completed (the customer's gas service was restored after they filed a complaint with PSC CAD and later agreed to pay to have the gas meter on their property relocated), and five customers remain without gas service and have not contacted BGE.

Thirty-seven customers have filed complaints with the PSC CAD, and as of March 27, 2019, the PSC CAD has not ruled against BGE in any complaint involving the gas meter protection program. BGE is awaiting rulings on two complaints from the PSC CAD and three formal complaints from the Commission. BGE shall submit responses to one formal complaint from the Commission and one complaint from the PSC CAD. Twenty-six customers have had their complaint resolved and protection work completed, and four customers have had their complaint resolved but have not had protection work completed. BGE responds to these complaints in accordance with the PSC CAD's process.

BGE is pleased with the progress being made thus far in the meter protection program. Although there have been challenges in working with customers who are resisting the work and others that are non-responsive, these issues were expected and are being addressed in a systematic manner. As first noted above, BGE is always examining ways to improve the program and enhance customer response rates. BGE looks forward to continuing this important work throughout 2019.

Please do not hesitate to contact me should you or anyone with the PSCED or PSC CAD have any questions or concerns regarding the process or progress of the meter protection program work.

Sincerely,



Daniel W. Hurson