

CITY OF LUMPKIN
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James P. Babb
Mayor

Barbara Cullefer
Mayor Pro Tem

December 11, 2017

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Reece McAlister
Executive Secretary
Georgia Public Service Commission
244 Washington Street
Atlanta, GA 30334

RE: Docket No. 37066
Inspection No. AT17-022

Dear Mr. McAlister:

The City of Lumpkin (“Lumpkin”) respectfully files this response to the Report on Inspection No. AT17-022 that was filed on November 27, 2017, in Docket No. 37066, in accordance with the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC’s Pipeline Safety Director* that was attached to the Report.

Enclosed herewith are five (5) copies of this response, as well as a CD containing an electronic version of the response.

OBSERVED ISSUE or ITEM OF CONCERN

Note that the cover letter for this Report states that Staff has recommended an Observed Issue, which, according to the response information included with this Report, needs only an email acknowledgement, while the Report indicates that Staff found an Item of Concern, for which the response information advises notice of any corrective action to be in the Operator’s best interest. To ensure adherence with the Pipeline Safety Director’s response information, Lumpkin is treating this as a Letter of Concern and files its response accordingly.

“STAFF’S CONCERN: During this inspection Staff noted that the Operator is not participating in the Georgia Pipeline Emergency Response Initiative (GPERI). Staff is

concerned that the Operator may not be able to fully demonstrate that they have met the liaison requirements of 49CFR §192.615(c) in regard to the fire response officials for their natural gas system.”

RESPONSE

In accordance with section IB of the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director*, Lumpkin acknowledges receipt of this Letter of Concern and provides notice that the following action will be taken:

Lumpkin appreciates Staff's concern relative to its being able to demonstrate compliance with liaison requirements. Although Lumpkin is confident that all applicable liaison requirements are being and will continue to be met, and that compliance can be demonstrated, Lumpkin will address Staff's concern by participating in the GPERI program.

CONTINUING PROBABLE VIOLATION

In accordance with section IID of the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director* that was included with this Report, Lumpkin provides the current status, updates, expected completion dates, and proposed modifications, if any, of the Continuing and/or existing Violations that were not cleared as a result of the current Inspection.

192.455 As cited in Inspection # LB10-047

STATUS

Lumpkin's City Manager will prepare a plan for addressing the remaining bare steel services and will seek City Council approval of the plan at its January meeting. The response to this Continuing Violation will be updated within 30 days following the City Council meeting.

199.101 As cited in Inspection # LB16-003

STATUS

As stated in the Report on Inspection CS17-014, Lumpkin has taken action to address this Probable Violation and Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

199.105(d) as cited in Inspection # LB16-003

STATUS

As stated in the Report on Inspection CS17-014, Lumpkin has taken action to address this Probable Violation and Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

40.73(c), which was cited in Inspection # LB16-003

STATUS

As stated in the Report on Inspection CS17-014, Lumpkin has taken action to address this Probable Violation and Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

40.67(d) (2) as cited in Inspection # LB16-003

STATUS

As stated in the Report on Inspection CS17-014, Lumpkin has taken action to address this Probable Violation and Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

40.67(g), which was cited in Inspection # LB16-003

STATUS

As stated in the Report on Inspection CS17-014, Lumpkin has taken action to address this Probable Violation and Staff is holding the violation open until a Consent Agreement has been completed. Lumpkin has proposed mitigation measures and is awaiting a response.

Please let us know if you have any questions or need additional information.

Sincerely,
CITY OF LUMPKIN



Shirley Walker
City Manager

cc: Michelle Thebert, GPSC
Alan Towe, GPSC
Chris Welborn, SRCS