Mayor Larry Morgan

Mayor Pro Tem Sherry Combs

Council Members Larry Atkins Sherry Combs Robert Dixon Matthew Hodges Phil Polhill



November 29, 2018

City Clerk

Saralyn R. Flonnory

City Administrator

Richard T. Sapp

City Attorneys Abbot and Murphy, P.C.

> Fire Chief Chester L. Johnson

Police Chief James W. Miller, Jr.

> Supt. Utilities L. C. Clark, Jr.

## CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

RE:

Docket No. 37065

Inspection No. DL18-017

Dear Mr. McAlister:

The City of Louisville ("Louisville") respectfully files this response to the Report on Inspection No. DL18-017 that was filed on October 16, 2018, in Docket No. 37065, 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.

## NOTICE OF PROBABLE VIOLATION

"As a result of this inspection Staff found that the City of Louisville was in probable violation of the minimum federal safety standards, specifically:

49CFR §199.105...

PROBABLE VIOLATION: The City of Louisville failed to perform random drug testing in accordance with the PHMSA Drug and Alcohol Testing Regulation, and Section 4.1 of their Anti-Drug and Alcohol Misuse Plan."

## **RESPONSE**

In accordance with sections IA1 and IIA1 of the *Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director*, Louisville does not contest the violation alleged or request an informal conference to discuss this NOPV and files the following written statement indicating that corrective measures have achieved compliance:

Louisville has changed its policies and procedures to ensure that random drug tests are conducted timely and that the minimum annual percentage rate for covered employee testing, which is currently 50%, is met.

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

Sincerely,

CITY OF LOUISVILLE

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Richard T. Sapp City Administrator

cc: Michelle Thebert, GPSC

David Lewis, GPSC Chris Cawley, SRCS