

Utilities Division
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City of Toccoa

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

CERTIFIED MAIL – RETURN RECEIPT # 7017 2680 0001 1450 9867

RE: Docket No. 37092
Inspection No. JJ19-034

Dear Mr. McAlister:

The City of Toccoa (“Toccoa”) acknowledges receipt of the No Violation Letter for the Report on Inspection No. JJ19-034 that was filed on January 17, 2020, in Docket No. 37092. Toccoa respectfully files this response 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.

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, Toccoa provides the current status, updates, expected completion dates, and proposed modifications, if any, of the Continuing and/or existing Violation(s) that were not cleared as a result of the current Inspection.

192.479 as cited in Inspection AT16-029

STATUS

Toccoa has completed more than 1,029 meter sets and now expects completion by December 31, 2021.

192.739 as cited in Inspection AT16-029

STATUS

By April 30, 2020, Toccoa will advise GPSC Staff of the date by which a plan will be developed for demonstrating how the maximum allowable operating pressure was established for the referenced facilities.

192.743 as cited in Inspection AT18-022

STATUS

By April 30, 2020, Toccoa will advise GPSC Staff of the date by which a plan will be developed for demonstrating how the maximum allowable operating pressure was established for the referenced facilities.

192.13(c) as cited in Inspection AT18-022

STATUS

- a. 192.479(a) - As stated in the Report on Inspection JJ19-032, Toccoa has taken action to address this Probable Violation. Subsequent to this Inspection, Toccoa proposed mitigation measures for the proposed civil penalty and is awaiting a draft Consent Agreement.
- b. 192.739(a) - By June 30, 2020, Toccoa will inspect all of its regulator stations, identify those that need protection from vehicular damage, and install protection.

192.619(a) as cited in Inspection AT18-022

STATUS

By April 30, 2020, Toccoa will advise GPSC Staff of the date by which a plan will be developed for demonstrating how the maximum allowable operating pressure was established for the referenced facilities.

192.181(b) as cited in Inspection AT18-022

STATUS

Toccoa has determined that the date for development of an inlet valve installation plan provided in the previous response applied only to regulator stations adjacent to Toccoa's Transmission Line and that there are many more regulator stations that must be reviewed before a comprehensive plan can be developed. By March 31, 2020, Toccoa will advise GPSC Staff of the date by which an inlet valve installation plan will be developed.

192.199(g) as cited in Inspection AT18-022

STATUS

Toccoa has installed protection at approximately 75% of the stations that were identified and will complete the remainder by June 30, 2020.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Harry Scott", with a large, stylized flourish at the end.

Harry Scott, Utilities Director
City of Toccoa/Toccoa Natural Gas

cc: Michelle Thebert, GPSC
Joe Jones, GPSC
Tim Franklin, SRCS