

TRI-COUNTY NATURAL GAS
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April 7, 2020

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

RE: Docket No. 37093
Inspection No. DJ19-060

Dear Mr. McAlister:

Tri-County Natural Gas (“Tri-County”) respectfully files this response to the Report on Inspection No. DJ19-060 that was filed on February 26, 2020, in Docket No. 37093, 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.

LETTER OF CONCERN

“FOLLOW-UP INSPECTION: During this inspection (DJ19-060), Staff reviewed documentation provided by the Operator which shows that Tri-County has determined that their feeder line is currently operating at less than (sic) 20% SMYS. Staff remains concerned that this line has been incorrectly classified because it is serving more than one distribution center.”

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*, Tri-County acknowledges receipt of this Letter of Concern and provides notice that the following actions have been taken:

The cities that own Tri-County Natural Gas, Greensboro and Union Point, both of which have separate natural gas distribution systems, have submitted a resolution to the State

Legislature requesting the establishment of an authority under which the three gas systems would become a single Operator, in which case there would no longer be a question of downstream distribution centers.

PROBABLE VIOLATION CONTINUING

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, Tri-County provides the current status, updates, expected completion dates, and proposed modifications, if any, of the Continuing and/or existing Violation that was not cleared as a result of the current Inspection.

“In regard to the probable violation of §192.619(a) which was cited in Inspection Number JS18-042; in that inspection Staff noted that: ‘Tri-County Natural Gas did not have complete records to substantiate the established MAOPs.’

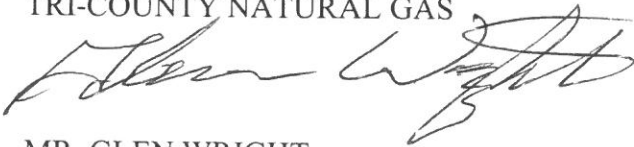
FOLLOW-UP INSPECTION: During this inspection (DJ19-060), Staff reviewed documentation provided by the Operator which shows that the Operator has calculated that the operating pressure of their feeder line is below 20% SMYS; however, this documentation does not demonstrate the maximum allowable operating pressures for this pipeline, or the other Tri-County pipeline, has been determined under §192.619.”

STATUS

Tri-County has taken additional steps to review and document the MAOP of its feeder line and other facilities in accordance with §192.619. This documentation is available for review by Staff.

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

Sincerely,
TRI-COUNTY NATURAL GAS



MR. GLEN WRIGHT
CHAIRMAN / TRI-COUNTY NATURAL GAS

cc: Michelle Thebert, GPSC
Daphne Jones, GPSC
Chris Cawley, SRCS