

CITY OF WARNER ROBINS
GEORGIA'S INTERNATIONAL CITY - CHARTERED 1943
"A CITY OF CHARACTER"

MAYOR
Randy Toms

October 19, 2020

**MEMBERS OF
COUNCIL**

Post 1
Daron Lee
Post 2
Charlie Bibb
Post 3
Keith Lauritsen
Post 4
Kevin Lashley
Post 5
Clifford Holmes, Jr.
Post 6
Larry Curtis, Jr.

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

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

RE: Docket No. 37098
Inspection No. JB20-009

Dear Mr. McAlister:

The City of Warner Robins ("Warner Robins") acknowledges receipt of the No Violation Letter for the Report on Inspection No. JB20-009 that was filed on September 23, 2020, in Docket No. 37098, and 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.

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, Warner Robins 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.

192.1007(d) as cited in Inspection AT19-023

STATUS

Warner Robins has implemented additional actions to address its highest-ranking risk and is monitoring the effectiveness of these actions. These actions include maintaining records for use in requesting GUFPA intervention. Warner Robins has also created the position of Damage Prevention Specialist with responsibilities that include monitoring excavation activities near natural gas facilities.

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192.1007(e) as cited in Inspection AT19-023

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STATUS

Warner Robins established baselines for identified risks and is monitoring performance of its Program relative to these baselines.

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192.616 as cited in Inspection AT19-024

STATUS OF OBSERVED DEFICIENCIES

1) Question 2.02 ...

STATUS

Warner Robins has revised its message for the Emergency Officials stakeholder audience to include procedures for reporting a gas pipeline release and has delivered these updated messages.

CITY CLERK
Mandy Stella

CITY ATTORNEY
Julia Bowen Mize

2) Question 2.04 ...

STATUS

Warner Robins delivered messages to the Public Officials stakeholder audience on August 25, 2019, and will ensure that future messages are delivered timely.

OF COUNSEL
James E. Elliott, Jr.

3) Question 2.06 ...

STATUS

Warner Robins is current with conducting liaison with Emergency Officials through 2019 and is currently evaluating alternative methods for conducting liaison under the limitations of the ongoing pandemic.

4) Question 3.01 ...

STATUS

Warner Robins is current with performing annual reviews of its Public Awareness Plan and will ensure that annual reviews are performed timely in the future.

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James E. Elliott, Jr.

5) Question 4.03 ...

STATUS

Warner Robins has determined that a supplemental enhancement is necessary to encourage members of the Public Officials stakeholder audience to respond to effectiveness evaluations. Warner Robins has decided the supplemental enhancement will be to deliver messages annually and will ensure that this takes place.

6) Question 4.06 ...

STATUS

Warner Robins is now tracking third-party damages in an attempt to measure bottom-line results. Per Section 8.4.4 of API RP 1162, Warner Robins has considered using the Affected Public's perception of the safety of pipelines and opted to not use this as an attempt to measure bottom-line results.

7) Question 4.07 ...

STATUS

Warner Robins has incorporated the supplemental enhancement described in the response to item 5 above into its Public Awareness Program.

Warner Robins has also requested an Informal Conference with the Facilities Protection Director to discuss the Proposed Civil Penalty associated with this Probable Violation.

192.807 as cited in Inspection DJ20-006

STATUS

Warner Robins has determined that the evaluations referenced in this Report were conducted properly but were incorrectly documented. Warner Robins' evaluators were retrained in proper documentation of evaluations during this inspection and in the presence of Staff. To ensure continued compliance, the Gas Supervisor now reviews all evaluation documentation before the evaluations are recorded. Warner Robins has also contracted with a consultant to provide Operator Qualification training and evaluating services.

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192.805(b) as cited in Inspection LB20-007

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STATUS

Warner Robins has retrained its evaluators in properly conducting and documenting evaluations as described in the response above to the Probable Violation of §192.807 and has contracted with a consultant to provide Operator Qualification training and evaluating services. Warner Robins has also requested an Informal Conference with the Facilities Protection Director to discuss the Proposed Civil Penalty associated with this Probable Violation.

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192.605(a) as cited in Inspection LB20-016

STATUS

Warner Robins will ensure that its personnel will follow procedures when repairing leaks and performing other tasks. Further, Warner Robins will ensure that its personnel will stop the flow of gas to the extent possible prior to repairing leaks unless the protection of life or property make it necessary to make repairs or take related action with gas escaping from the pipeline. By October 15, 2020, Warner Robins will revise its Operations and Maintenance Manual and Procedures to address these issues. Warner Robins has also requested an Informal Conference with the Facilities Protection Director to discuss the Proposed Civil Penalty associated with this Probable Violation.


CITY CLERK
Mandy Stella

CITY ATTORNEY
Julia Bowen Mize

OF COUNSEL
James E. Elliott, Jr.

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

Sincerely,
CITY OF WARNER ROBINS



Randy Toms, Mayor

cc: Michelle Thebert, GPSC
Jeff Baggett, GPSC
Wade Sharpe, SRCS