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Georgia Public Service Commission

(404) 463-6526
(800) 282-5813

244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
www.psc.state.ga.us

DOCKET # 37066
DOCUMENT # 188818

Docket No. 37066

City of Lumpkin Gas Department
P. O. Box 278
Lumpkin, GA 31815

Certified Mail

Regular Mail

Email

Attention: Mr. David Davis

On October 14, 2021, a representative of the Georgia Public Service Commission Pipeline Safety/Facilities Protection Office conducted an on-site inspection of your gas system and found that previously identified probable violation(s) of the Pipeline Safety Regulations have either been cleared or are continuing, as identified below.

- Previously existing probable violation(s) has/have been cleared.
- Previously existing probable violation(s) still exist.
- Additional Enforcement
 - Notice of Proposed Violation
 - Notice of Proposed Violation with Proposed Civil Penalty
 - Warning Letter
 - Letter of Concern
 - Observed Issue
- Consent Agreement Pending

The enclosed inspection report numbered JS21-022 is provided for your information and file.

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Actions, Enforcement Letters, and Notifications Issued by the Georgia Public Service Commission. Please refer to Docket No. 37066 in your response.

Please let me know if there are any questions concerning this report at (404) 463-6526 or michellet@psc.state.ga.us. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle L. Thebert
Director, Office of Pipeline Safety/Facilities Protection

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JS21-022

OPERATOR: City of Lumpkin Gas Department

INVESTIGATOR: Jason Smith

INSPECTION DATE: October 14, 2021

REPORT MAILED DATE: February 16, 2022

Any questions concerning this report may be directed to the above address or by telephoning (404) 463-6526.

1. PURPOSE OF INSPECTION

To follow-up on the Operator's previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.455	External corrosion control: Buried or submerged pipelines installed after July 31	LB10-047	5/4/2010
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JS18-001	1/23/2018

3. CLEARED VIOLATIONS

Cleared on 10/14/2021

Violation	Description	Inspection#	Date
199.101	Anti-Drug Plan	JS20-029	6/10/2020
199.117	Recordkeeping	JS20-029	6/10/2020
199.105(c)(6)	The operator shall randomly select a sufficient number of covered employees for testing during...	JS20-029	6/10/2020
40.15(b)	As an employer, you are responsible for ensuring that the service agents you use meet the...	JS20-029	6/10/2020

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF LUMPKIN GAS DEPARTMENT / FOLLOW-UP INSPECTION
INSPECTION NUMBER JS21-022 / DOCKET NUMBER 37066

On October 14, 2021, Staff reported to the City of Lumpkin to perform a follow-up inspection of the Gas Department's previously existing probable violations.

During this inspection, the Operator was represented by:
David Davis - City Manager
Ann Holloway - City Clerk/Designated Employer Representative

Commission Staff was represented by:
Jason Smith - Lead Inspector
Kenny Rowe - Pipeline Safety Inspector

At the time of this inspection, the City of Lumpkin was under five previously existing probable violation and negotiating a Consent Agreement with the Facilities Protection Unit Director. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATIONS CLEARED

1. In regard to §40.15 which was cited in Inspection Number JS20-029, in the report Staff stated: "The City of Lumpkin failed to ensure their service agents meet with the qualifications and requirements set forth under 49CFR, Parts 40 and 199."

OPERATOR RESPONSE: In their response letter to Inspection Number JS20-029 that was dated October 19, 2020 the Operator stated "Lumpkin will join a drug and alcohol testing consortium to ensure future compliance with the requirements of this Section. Documentation of compliance will be in hand by November 30, 2020.

FOLLOW-UP: During this follow-up inspection (JS21-022) the Operator was able to provide documentation that shows the Substance Abuse Professional they utilize have successfully obtained the U.S. DOT SAP qualifications and the Medical Review Officer they use is certified.

Staff determined that this probable violation can be cleared at this time.

2. In regard to §199.101 which was cited in Inspection Number JS20-029, in the report Staff stated: "The City of Lumpkin failed to follow the procedures required by their written Anti-Drug & Alcohol plan for verifying contractor drug plans and conducting random testing quarterly."

OPERATOR RESPONSE: In their response letter to Inspection Number JS20-029 that was dated October 19, 2020 the Operator stated:

For Deficiency Number 1: Lumpkin has in hand the Drug & Alcohol Plan for the contractor in question. By October 30, 2020, Lumpkin will review this Plan for compliance and will document this review. In the future, Lumpkin will ensure compliance of its contractors with drug and alcohol regulations prior to commencement of work by the contractors.

For Deficiency Number 2: Lumpkin will join a drug and alcohol testing consortium to ensure future compliance with the requirements of this Section. Documentation of participation in the consortium will be in hand by November 30, 2020.

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INSPECTION NUMBER JS21-022 / DOCKET NUMBER 37066

FOLLOW-UP: During this follow-up inspection (JS21-022) the Operator showed Staff that they had access to their contractor's drug & alcohol plan for review and documented their review on the contractor compliance verification checklist which addresses deficiency Number 1.

Deficiency Number 2 is addressed by them joining the Compliance System, LLC consortium. The Operator has records showing that the consortium is subjecting participants in their random drug pool to quarterly testing.

Staff determined that this probable violation can be cleared at this time.

3. In regard to §199.105(c)(6) which was cited in Inspection Number JS20-029, in the report Staff stated: "The City of Lumpkin failed to conduct a sufficient amount of random drug testing as required by the drug testing regulations and their Anti-Drug & Alcohol plan procedures."

OPERATOR RESPONSE: In their response letter to Inspection Number JS20-029 that was dated October 19, 2020 the Operator stated "Lumpkin will join a drug and alcohol testing consortium to ensure future compliance with the requirements of this Section. Documentation of participation in the consortium will be in hand by November 30, 2020."

FOLLOW-UP: During this follow-up inspection (JS21-022) the Operator provided their 2020 Drug and Alcohol Testing MIS Data Collection Form that shows four (4) covered employees in the program, and 2 random test being performed. The Operator was able to show the CCFs of those to random test. They also provided a document from the consortium they joined in November 2020 which summarized Compliance Systems, LLC's random testing rates for calendar year 2020.

Staff determined that this probable violation can be cleared at this time.

4. In regard to the probable violation of §199.117 which was cited in Inspection Number JS20-029, in the report Staff stated: "The City of Lumpkin failed to maintain records that demonstrate the collection process conforms to this part must for at least 3 years as required by Part 199."

OPERATOR RESPONSE: In their response letter to Inspection Number JS20-029 that was dated October 19, 2020 the Operator stated "Lumpkin will join a drug and alcohol testing consortium to ensure future compliance with the requirements of this Section. Documentation of participation in the consortium will be in hand by November 30, 2020."

FOLLOW-UP: During this follow-up inspection (JS21-022) the Operator was able to show Staff the CCFs from the two (2) random drug test that was done in calendar year 2020. (during 2021 1st, 2nd and 3rd quarter testing with the consortium; no city of Lumpkin Gas Department employees were selected for random testing)

Staff determined that this probable violation can be cleared at this time.

PROBABLE VIOLATION CONTINUING

In regard to the probable violation of §192.455 which was cited in Inspection Number LB10-047, in that report Staff stated that During the field review staff confirmed that operator has not identified the

CITY OF LUMPKIN GAS DEPARTMENT / FOLLOW-UP INSPECTION
INSPECTION NUMBER JS21-022 / DOCKET NUMBER 37066

apparent bare steel risers in their system as recommended by staff in the previous inspection. After completing a field examination staff determined the following violation: 1. Violation of 49 CFR Part 192.455 External Corrosion Control.

OPERATOR RESPONSE: The Operator provided no response to this inspection report.

1st FOLLOW-UP INSPECTION: On January 31, 2011, Staff conducted a Follow-Up inspection on the City of Lumpkin (Ref: Inspection Number LB11-008). In that inspection Staff stated that: "Staff conducted a field examination and verified that no corrections have yet been made to any of the bare steel service risers that were reported to the operator. Staff directed operator to immediately develop an acceptable schedule for making appropriate corrections and submit the schedule for Staff's approval."

OPERATOR RESPONSE: In their response letter to Inspection Number LB11-008, dated April 12, 2011, the Operator stated: "Lumpkin has identified eighty five (85) bare steel services in its system and will take appropriate action to protect, replace, insert, or remove all of these services within eighteen (18) months. Cathodic Protection (CP) readings will be taken on all of these services to ensure protection, within two (2) months. All services found to have inadequate cathodic protection will be coated, inserted, replaced (with plastic), or removed from the system within eighteen (18) months."

2nd FOLLOW-UP INSPECTION: On July 7, 2011, Staff conducted an Operator Qualification (OQ) inspection on the City of Lumpkin (Ref: Inspection Number LB11-058). During the inspection, Staff did not specifically address the existing probable violation; however, the probable violation was noted as a continuing probable violation.

OPERATOR RESPONSE: The Operator provided no response to this inspection report.

3rd FOLLOW-UP INSPECTION: On March 22, 2012, Staff conducted an OQ inspection on the City of Lumpkin. (Ref: Inspection Number LB12-024). During the inspection, Staff did not specifically address the existing probable violation; however, the probable violation was noted as a continuing probable violation.

OPERATOR RESPONSE: The Operator provided no response to this inspection report.

4th FOLLOW-UP INSPECTION: On May 8, 2012, Staff conducted a Public Awareness Program inspection on the City of Lumpkin (Ref: Inspection Number LB12-035). During the inspection, Staff did not specifically address the existing probable violation; however, the probable violation was noted as a continuing probable violation.

OPERATOR RESPONSE: In their response letter to Inspection Number LB12-035, dated January 8, 2013, the Operator stated: "Lumpkin has determined that approximately 80 bare steel services remain in its system and will replace, insert or abandon these services by September 30, 2013."

5th FOLLOW-UP INSPECTION: On April 25, 2013, Staff conducted an OQ Follow Up inspection on the City of Lumpkin (Ref: Inspection Number SS13-011). In that inspection Staff stated: "Regarding the violation of 192.455 which was cited in inspection number LB10-047, Staff determined that this violation is still being addressed by the Operator and could not be cleared at this time. Staff will schedule a separate follow-up inspection for this probable violation."

OPERATOR RESPONSE: In their response letter to Inspection Number SS13-011, dated November 19, 2013, the Operator stated: "...Lumpkin does not seek an informal conference and files a written plan of

CITY OF LUMPKIN GAS DEPARTMENT / FOLLOW-UP INSPECTION
INSPECTION NUMBER JS21-022 / DOCKET NUMBER 37066

action outlining corrective measures that will be taken to achieve compliance and when compliance is anticipated, as follows:

In April, 2013, Lumpkin hired a contractor to complete bare service remediation. Approximately 47 services have been remediated to date.

Lumpkin has identified some of the work, performed by the contractor, as unsatisfactory. All work completed by the contractor is now being reviewed by both parties.

The unsatisfactory work and review has pushed the projected completion date back. The project will be assigned to a new contractor, but will not be completed as previously projected."

6th FOLLOW-UP INSPECTION: On April 24, 2014, Staff conducted a Distribution Integrity Management Program (DIMP) inspection on the City of Lumpkin. (Ref: Inspection Number CW14-028) In that inspection Staff stated: "During this inspection, Staff found that the Operator has replaced 55 bare steel services, and is currently replacing the remaining bare steel services in-house. Staff noted that the Operator is making progress; however, 25 bare steel services remain active. Staff requested that the Operator provide an updated plan for the completion of the replacement of the remaining 25 bare steel services in their response to this inspection report. Staff determined that this violation cannot be cleared at this time."

OPERATOR RESPONSE: In their response letter to Inspection Number CW14-028, dated August 24, 2014, the Operator stated: "...Lumpkin does not contest the violation alleged or request an informal conference and files the following written updated plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated:

Lumpkin has performed many bare steel service replacements, but will not complete the remaining 25 bare steel services in house. The city will be selecting a different contractor to complete the replacements. Selection of a contractor and final remediation will be completed by February, 2015."

7th FOLLOW-UP INSPECTION: On March 24, 2015, Staff conducted a Comprehensive inspection on the City of Lumpkin. (Ref: Inspection Number DJ15-012) In that inspection Staff stated: " During this inspection, the Operator stated that due to unsatisfactory work from the previous hired contractor, the projected completion date had to be pushed back. Staff noted that the Operator has now selected and hired D. Lance Souther as its new contractor to complete the bare steel replacements. The Operator has replaced 2 bare steel services out of the remaining 25 bare steel services. Staff verified that the Operator is making progress; however, 23 bare steel services remain active. Operator stated that the final remediation would now be completed by December 2015. Staff determined that this violation cannot be cleared at this time."

OPERATOR RESPONSE: In their response letter to Inspection Number DJ15-012, dated July 28, 2015, the Operator stated: "...Niya Williams 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. §192.455 as cited in Inspection Number LB10-047 - Lumpkin agrees with the status of this Continuing Violation as described in the current Inspection Report."

8th FOLLOW-UP INSPECTION: On January 7, 2016, Staff conducted a follow-up inspection on the City of Lumpkin (Ref: Inspection Number DJ16-002). In that inspection Staff stated: "In the Operator's response to Inspection Number DJ15-012, on July 28, 2015, the Operator stated that "Niya Williams would provide 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."

CITY OF LUMPKIN GAS DEPARTMENT / FOLLOW-UP INSPECTION
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“During this inspection, the Operator stated that Ms. Niya Williams, Interim City Manager/City Administrator, is no longer employed by the City of Lumpkin. Also, Mr. Randy Butts is now the new City Manager. Staff noted that the Operator had previously selected D. Lance Souther as its new contractor to complete the bare steel replacements but the City of Lumpkin has not signed a contract as of yet to start the project due to major changes of employees. Staff verified that the Operator has not made any progress on the removal of 23 bare steel services in the last year and they remain active. Operator stated in Inspection Number DJ15-012 that the final remediation would be completed by December 2015 but during this inspection, the operator is requesting additional time to remove these bare steel services. Staff determined that this violation cannot be cleared at this time.”

OPERATOR RESPONSE: In their response letter to Inspection Number DJ16-002, dated April 20, 2016, the Operator stated: "Lumpkin has reached agreement with a contractor to replace, insert, or remove from service the 15- 23 bare steel services that are known to be in its system. This work will begin by June 15, 2016, and will be completed by July 30, 2016."

9th FOLLOW-UP INSPECTION: On June 7, 2017 Staff conducted a follow-up inspection of the Operator's previously existing probable violation (Ref. Inspection Number CS17-014). In that inspection Staff stated that: “Staff determined that the Operator has taken action to address the probable violation; however, Staff also found that the Operator has not completed actions to clear this probable violation. Staff determined that this violation cannot be cleared at this time.”

OPERATOR RESPONSE: In their response letter to Inspection Number CS17-014, dated September 22, 2017 the Operator stated: "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 October meeting. The response to this Continuing Violation will be updated within 30 days following the City Council meeting."

10th FOLLOW-UP INSPECTION: On January 23, 2018 Pipeline Safety Staff reported to the city of Lumpkin and followed-up with §192.455 violation under report Number JS18-001. In that inspection Staff stated that: “the Operator informed staff that approximately seven (7) bare services remain in their system. City budget issues have caused delay in having the work done and completed. This issue is scheduled to be heard at the City's upcoming Council meeting. Pipeline Safety Staff determined that this probable violation could not be cleared at this time.”

OPERATOR RESPONSE: In their response letter to Inspection Number JS18-001, dated August 1, 2018 (and signed by Anne Holloway, City Clerk) the Operator stated that: “Lumpkin has engaged a contractor to replace the remaining bare steel services. The work will be completed by October 30, 2018.”

11th FOLLOW-UP INSPECTION: On August 31, 2020 Pipeline Safety Staff reported to the city of Lumpkin to conduct a follow-up inspection of the Operator’s previously existing probable violations (Ref. Inspection Number JS20-028). During the inspection the Operator provided Staff with a copy of a 2nd response letter to Inspection Number JS18-002, which was dated February 6, 2019; in that letter the Operator stated that: “Lumpkin has engaged a contractor to replace the remaining bare steel services. To-date five of the seven services have been replaced. Georgia Department of Transportation permits have been requested for the remaining two bare steel services and completions are expected by March 1, 2019.” Staff notes they could not find where this letter had been received by the Commission.

“Staff asked the Operator if there had been any updates regarding the continuing probable violation. The Operator stated that the work for the remaining services had been completed, but they were not able to provide Staff with the documentation which demonstrated such. Staff informed the Operator that once

CITY OF LUMPKIN GAS DEPARTMENT / FOLLOW-UP INSPECTION
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they obtained the records showing the seven bare steel services had been addressed the §192.455 violation could be cleared.” Staff determined that this probable violation could not be cleared at this time.

OPERATOR RESPONSE: In their response letter to Inspection Number JS20-029 that was dated October 19, 2020 the city of Lumpkin stated “All isolated steel services have been addressed by replacement, insertion, or removal from service. Documentation is available for Staff’s review.”

12th FOLLOW-UP: During this follow-up inspection (JS21-022) Staff asked the Operator for the records that would show their remaining isolated have been addressed. Lumpkin’s city clerk was not able to locate the documentation and informed Staff that there was one service that still needed to be addressed. The City of Lumpkin Gas Department’s contractor happened to be present at the time and said they would get copies of the work orders sent to the Operator and they were planning on scheduling the work for the one remaining service.

Staff determined that this probable violation could not be cleared at this time.

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Letters Issued by the Georgia Public Service Commission.

OPERATOR RESPONSE FORM

Operator Name: CITY OF LUMPKIN GAS DEPARTMENT

Informal Conference Requested: Yes No

Docket Number: 37066

Responses required within **30 days of electronic mail**. Provide the following information for this report:

Response to Inspection Number: _____

Type of Enforcement Action(s) cited in report:

Informal Conference Requested

- | | | |
|--|--|--|
| <input type="checkbox"/> Notice of Probable Violation (NOPV) | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Notice of Amendment (NOA) | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Warning Letter | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Letter of Concern | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Observed Issue | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Proposed Civil Penalty | \$ _____ | |

PCP \$ Amount (Total for report)

Indicate below (A-E) based on the type of Enforcement Actions in this report: (Check all that apply)
Complete a separate copy of Page 2, Operator Response to Enforcement Action, for each cited item.

- A. Response for **Notice of Probable Violation** (with and without proposed civil penalty):
- Written statement indicating that corrective measures have achieved Compliance or
 - Written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated.
- B. Response for **NOA**:
- Contested: Attach written explanation, information, or other material in answer to the allegations in the Notice of Amendment stating your reasons for objecting to the NOA, in whole or in part; or
 - Not Contested: Explanation, information, or other material believed to warrant modification of the NOA in whole or in part; or
 - Written request for clarification. (Attached)
- C. Response for **Continuing** and/or **Existing** violations:
Current status, updates, expected completion dates, proposed modifications, etc., of the continuing and/or existing violations, even if this information was previously provided. Referencing a previously filed response letter, as status, updates, etc. alone is not sufficient for this response. Failure to provide this information may result in formal interrogatories from the Director through data requests.
- D. Response for **Letter of Concern** / **Warning Letter**
I acknowledge receipt of the Letter of Concern/Warning Letter: _____
SIGNATURE / TITLE
- Additional Comments: (Optional) _____

- E. Response for **Observed Issue** and **No Violation**: (Optional Response)
Staff requests that the Operator acknowledge receipt of the Observed Issue/No Violation in writing, or by submitting an email to the FPU Director

Operator Response to Enforcement Action

Enforcement Action for: _____

New Violation

Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:

Conference Requested:

Notice of Probable Violation (NOPV)

Yes No

\$ _____

Notice of Amendment (NOA)

Yes No

Proposed Penalty for this violation

Warning Letter

Yes No

Letter of Concern

Yes No

Observed Issue

Yes No

Proposed Civil Penalty

Yes No

OPERATORS RESPONSE: _____

Response Provided by: _____

Name / Title

Date: _____

Internal use only:

Lead Inspector: _____

Date Response Reviewed: _____

Actions Acceptable: Yes No

Re-inspection Needed: Yes No

Clear Violation: Yes No

Supervisor Review by: _____

Date Reviewed: _____

Additional Enforcement Recommended: Yes No

Director Review

Approved: Yes No

Schedule Special Follow-up Inspection: Yes No

Cleared Violation: Yes No

Comments: _____

OPERATOR RESPONSE FORM

Operator Name: CITY OF LUMPKIN GAS DEPARTMENT

Informal Conference Requested: Yes No

Docket Number: 37066

Filings:

For all written responses or any other official correspondence, the Operator shall file the response at the following address:

Ms. Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334

The Operator must file **five (5)** copies of any response and/or official correspondence, as well as a CD with an electronic version of the response in Microsoft Word and/or a PDF, if applicable.

Informal Conference:

Any Operator who chooses to request an informal conference shall request such a conference through emailing the Director (michellet@psc.state.ga.us), calling the Director (404-463-2765), or selecting the "Request Conference" choice.

Civil Penalty Payments:

Certified check for the full amount of the recommended civil penalty or consent agreement amount made payable to the Georgia Public Service Commission. The Operator's name, applicable Docket No., and Inspection Report No. must be included on the certified check. Mail payment to:

Ms. Michelle Thebert, Director, Facilities Protection Unit
Georgia Public Service Commission
244 Washington Street
Atlanta, Georgia 30334

Hearing Requests:

The Operator has the right to request a hearing before the full Commission to contest the alleged probable violations, recommended civil penalties, and all other proposed actions of enforcement. A request for a hearing must be submitted in writing and in accordance with Commission Rule 515-2-1-.04. The Operator must include a statement of the issues that you intend to raise at the hearing. The issues may relate to the allegations, new information, proposed compliance order, proposed civil penalty, or any other recommendation for enforcement action. Please refer to Commission Rule 515-9-3-.11 and O.C.G.A. § 46-2-91 for assessment considerations upon which civil penalties are based. An operator's failure to specify an issue may result in a waiver of the right to raise that issue at hearing. The request must also indicate whether or not the Operator will be represented by counsel at the hearing.

Open Records and Trade Secret Filings:

The Operator is advised that any material provided to the Commission, and all materials prepared by the Commission, including the Notice of Probable Violations and any Orders issued in this case, may be considered public information and subject to disclosure under the Georgia Open Records Act (O.C.G.A. § 50-18-70 et seq.). If you believe that any portion of your response material is security sensitive, privileged, confidential or may cause your company competitive disadvantages and would qualify for protection under the Commission's "Trade Secret Rule" (Commission Rule 515-3-1-.11), you must, along with the complete original document clearly marked "TRADE SECRET" on each page, provide a second copy of the document with the portions you believe qualify for trade secret treatment redacted, and an explanation of why you believe the redacted information qualifies for such trade secret treatment. Should the Commission receive a request for disclosure of any "TRADE SECRET" material, you will be notified, if after review, the materials and your provided justification are deemed not to meet any exemptions provided in the Georgia Open Records Act. You may appeal the Commission's decision to release material at that time. Your appeal will stay the release of those materials until a final decision is made.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:)

Cleared and Continuing Violation Report;)
City of Lumpkin Gas Department) DOCKET NO. 37066
Inspection JS21-022 on October 14, 2021)
)

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have caused to be served a copy of the foregoing, and a copy of same was served upon all parties and persons listed below via electronic mail as indicated by an asterisk I further certify that the *City of Lumpkin Gas Department* was served a hard copy of the above-stated document by U.S. Mail, certified/return receipt requested.

*Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

*David Davis, City Manager
City of Lumpkin Gas Department
P.O. Box 278
Lumpkin, GA 31815
ddavis@cityoflumpkin.org

*Michelle Thebert, Facilities Protection Unit Director
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

Respectfully Submitted this 24th day of January 2022:



Cathy Nesbitt, Administrative Assistant
Georgia Public Service Commission
Facilities Protection Unit
244 Washington Street, SW
Atlanta, GA 30334