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# Georgia Public Service Commission

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244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
psc.ga.gov

DOCKET# 37100
DOCUMENT# 191682

Docket No. 37100

City of West Point Gas System
P. O. Box 487
West Point, GA 31833

REF: Methane Emission Plan Inspection # AT22-038

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Ed Moon

On August 8, 2022, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered AT22-038 is provided for your information and file.

In conjunction with this inspection report, Staff has recommended the following enforcement(s):

Enforcement Action:

- ☐ Notice of Probable Violation
- ☐ Notice of Probable Violation with Proposed Civil Penalty
- ☐ Notice of Amendment

Enforcement Letter:

- ☐ Warning Letter
- ☐ Letter of Concern

Enforcement Notification:

- ☐ Observed Issue
- ☒ No Violation

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. 37100 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 Thebert

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

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## REPORT OF NATURAL GAS SAFETY

INSPECTION NO: AT22-038

OPERATOR: City of West Point Gas System

INVESTIGATOR: Alan Towe

INSPECTION DATE: August 8, 2022 REPORT MAILED DATE: September 28, 2022

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

### 1. PURPOSE OF INSPECTION

To perform an inspection of the operators methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On August 8, 2022, Staff reported to the City of West Point Gas System to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020.

During this inspection, the Operator was represented by:
Stacy Langley – Gas Superintendent
Sammy Inman – Utilities Director
Gene Taylor – MGAG/SRCS (Consultant)

Commission Staff was represented by Alan Towe, Lead Inspector

At the time of this inspection the City of West Point had no previously existing probable violations.

NO VIOLATIONS FOUND

49CFR §192.603 General
(c) The Associate Administrator or the State Agency that has submitted a current certification under the pipeline safety laws, (49 U.S.C. 60101 et seq.) with respect to the pipeline facility governed by an operator's plans and procedures may, after notice and opportunity for hearing as provided in 49 CFR 190.206 or the relevant State procedures, require the operator to amend its plans and procedures as necessary to provide a reasonable level of safety.

STAFFS COMMENTS: The Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020 was signed on December 27, 2020. This statute contains a self-executing mandate requiring operators to update their inspection and maintenance plans to address eliminating hazardous leaks and minimizing releases of natural gas (including intentional venting during normal operations) from their pipeline facilities. Operators must also revise their plans to address the replacement or remediation of pipeline facilities that are known to leak based on their material, design, or past operating and maintenance history.

Section 114 of the Protecting our Infrastructure of Pipelines and Enhancing Safety Act of 2020, Public Law No. 116-260 (Act) requires operators, by December 27, 2021, to update the inspection and maintenance plan required under section 60108(a) to address the elements described in the amendments to that section outlined below:

- Section 60108(a)(2)(D) - the extent to which the plan will contribute to — (i) public safety; (ii) eliminating hazardous leaks and minimizing releases of natural gas from pipeline facilities; and (iii) the protection of the environment; and

- Section 60108(a)(2)(E) - the extent to which the plan addresses the replacement or remediation of pipelines that are known to leak based on the material (including cast iron, unprotected steel, wrought iron, and historic plastics with known issues), design, or past operating and maintenance history of the pipeline.

During this inspection (AT22-038), Staff examined the City of West Point's Natural Gas System Methane Emission Mitigation Plan adopted December 6, 2021 and associated appendices. Staff utilized the PHMSA Section 114 inspection Form 27 for gas distribution operators to review the City of West Point's Methane Emission Plan and all related records to verify compliance with Minimum Federal Safety Regulations. Staff determined that the Operator has incorporated minimum standards and measures into their Methane Emission Plan to reduce methane in their day to day operations.

As a result of this inspection Staff noted no probable violations of the minimum federal safety standards.

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.

**BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION**
**STATE OF GEORGIA**

| | | |
|---|---|---|
| **IN THE MATTER OF:** | ) | |
| | ) | |
| **No Violation Report** | ) | **DOCKET NO. 37100** |
| **City of West Point Gas System** | ) | |
| **Inspection AT22-038 on August 8, 2022** | ) | |
| | ) | |

## 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 West Point Gas System* 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

*Ed Moon, City Manager
City of West Point Gas System
P.O. Box 487
West Point, GA 31833
emoon@cityofwestpointga.com

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

Respectfully Submitted this 12th day of October 2022:

Cathy Nesbitt

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