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FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

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244 Washington Street, SW
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FAX: (404) 463-6532
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DOCKET# 37617
DOCUMENT# 191848

Docket No. 37617

Southern Company
42 Inverness Center Parkway
Birmingham, AL 35242

REF: Methane Emission Plan Inspection # DL22-036

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Harvey Ivey

On August 9, 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 DL22-036 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. 37617 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: DL22-036

OPERATOR: Southern Company (Plant McDonough)

INVESTIGATOR: David Lewis

INSPECTION DATE: August 9, 2022 REPORT MAILED DATE: October 19, 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 July 18, 2022, Staff requested Southern Company (Plant McDonough) Methane Emissions O&M Plans (transmission), along with documentation to support the plans and other relevant documentation for hazardous leaks and releases of gas. On July 25, 2022, Southern Company (Plant McDonough) replied with the requested information and Staff began the inspection on August 8-9, 2022.

During this inspection, the Operator was represented by Jim Denham, OPS – Compliance Engineer, Sr.

Commission Staff was represented by David Lewis, Lead Pipeline Safety Inspector.

At the time of this inspection, Southern Company (Plant McDonough) was under zero (0) 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 these inspections (DL22-036) Staff examined the Southern Company (Plant McDonough's) Methane Emissions Mitigation Plans for transmission and documented the findings on the Form 26- section 114 inspection and, ten years of leak history by cause (if chart is not included in data base then there were no leaks by cause), five years of PHMSA 7100. Reports, mitigation action plan, lost and unaccounted for gas, gas leak surveys, right-of-way patrolling.

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. 37617**
Southern Company (McDonough)	)	
Inspection DL22-036 on August 9, 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 *Southern Company* 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

*Jim Denham, Operation Compliance
Southern Company
42 Inverness Center Parkway
Birmingham, AL 35242
jhdenham@southernco.com

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

*Stan Connally, President & CEO, SCS
Southern Company
600 18th Street North
P.O. Box 2641
Birmingham, AL 35203
swconnal@southernco.com

Respectfully Submitted this 3rd day of November 2022:

Cathy Nesbitt

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