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FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

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Atlanta, GA 30334-5701

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DOCKET# 37038
DOCUMENT# 191926

Docket No. 37038

City of Commerce Gas System
P. O. Box 348 27 Sycamore Street
Commerce, GA 30529

REF: Methane Emission Plan Inspection # JH22-008

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. James Wascher

On September 15, 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 JH22-008 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. 37038 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: JH22-008

OPERATOR: City of Commerce Gas System

INVESTIGATOR: Jack Hewitt

INSPECTION DATE: September 15, 2022 REPORT MAILED DATE: October 25, 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 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.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.805(a)	Each operator shall have and follow a written qualification program. The program shall include...	DJ18-054	12/3/2018
192.13(c)	Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and...	JB19-011	9/4/2019
192.805(b)	Ensure through evaluation that individuals performing covered tasks are qualified.	JB19-011	9/4/2019
192.605(b)(9)	Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe...	JB19-011	9/4/2019
192.805(d)	Evaluate an individual if the operator has reason to believe that the individual's performance of...	JB19-011	9/4/2019
192.805(e)	Evaluate an individual if the operator has reason to believe that the individual is no longer...	JB19-011	9/4/2019
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JB20-001	3/10/2020

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On September 14, 2022 Staff reported to the City of Commerce to perform an inspection of The City of Commerce's Methane Emissions Plan for compliance with The Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020.

During this inspection, the Operator was represented by:
Lonnie Robinson – Natural Gas Director
Bruce Bagnasco - MGAG/SRCS (Consultant)
Tim Franklin - MGAG/SRCS (Consultant)

Commission Staff was represented by Jack Hewitt, Lead Pipeline Safety Inspector.

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 (JH22-008), Staff examined the City of Commerce's Methane Emissions Mitigation Plan and documented the findings on the Form 27- section 114 inspection form, 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, list of regulator stations, procedures for purging, regulator inspection, 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. 37038**
City of Commerce Gas System	)	
Inspection JH22-008 on September 15, 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 Commerce 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

*James Washer, City Manager
City of Commerce Gas System
P.O. Box 348
27 Sycamore Street
Commerce, GA 30529
jamesw@commercega.org

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

Respectfully Submitted this 3rd day of ~~October~~ November 2022:

Cathy Nesbitt

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