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Georgia Public Service Commission

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Atlanta, GA 30334-5701

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DOCKET# 37077
DOCUMENT# 192076

Docket No. 37077

City of Quitman Gas Department
PO Box 208
Quitman, GA 31643-0208

REF: Comprehensive Inspection # AT22-013

☑ Certified Mail ☐ Regular Mail ☐ Email

Attention: Mr. Raphel Maddox

On March 21, 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 AT22-013 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. 37077 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

COMMISSIONERS

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: AT22-013

OPERATOR: City of Quitman Gas Department

INVESTIGATOR: Alan Towe

INSPECTION DATE: March 21, 2022 REPORT MAILED DATE: November 8, 2022

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

1. PURPOSE OF INSPECTION

To conduct a comprehensive inspection of the Operators plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JS19-052	12/16/2019

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.615(b)(2)	Train the appropriate operating personnel to assure that they are knowledgeable of the emergency...	AT22-013	3/21/2022
192.615(c)	Each operator shall establish and maintain liaison with appropriate fire, police, and other...	AT22-013	3/21/2022
192.615(b)(3)	Review employee activities to determine whether the procedures were effectively followed in each...	AT22-013	3/21/2022
192.805(b)	Ensure through evaluation that individuals performing covered tasks are qualified.	AT22-013	3/21/2022
192.615(b)(1)	Each operator shall: Furnish its supervisors who are responsible for emergency action a copy of...	AT22-013	3/21/2022
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	AT22-013	3/21/2022
192.615(a)(3)	Each operator shall establish written procedures to minimize the hazard resulting from a gas...	AT22-013	3/21/2022
192.605(b)(3)	Maintenance and normal operations. The manual required by paragraph (a) of this section must...	AT22-013	3/21/2022
192.615(a)(8)	Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and...	AT22-013	3/21/2022
192.615(a)(6)	Emergency shutdown and pressure reduction in any section of the operator's pipeline system neces...	AT22-013	3/21/2022
192.615(a)(4)	The availability of personnel, equipment, tools, and materials, as needed at the scene of an...	AT22-013	3/21/2022
192.615(a)(10)	Beginning action under §192.617, if applicable, as soon after the end of the emergency as possible.	AT22-013	3/21/2022

5. OTHER RECOMMENDATIONS/COMMENTS

AEE ATTACHED INSPECTION REPORT

CITY OF QUITMAN / COMPREHENSIVE INSPECTION
INSPECTION NUMBER AT22-013 / DOCKET NUMBER 37077

From March 21 to 24, 2022, Staff reported to the City of Quitman to perform a comprehensive inspection. The inspection consisted of an examination of the Operators O&M Manual, emergency plan, records and pipeline facilities for compliance with the minimum federal safety standards.

During the inspection, the Operator was represented by:
Willie Cody – Quitman Gas Supervisor
Rannada Goss – Quitman Gas Clerk
Sam Yarley – MGAG/SRCS (Consultant)

Commission Staff was represented by:
Alan Towe - Lead inspector
Jack Hewitt – Pipeline Safety Inspector

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

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that the Operator was in probable violation of the minimum federal safety standards; specifically:

1. 49CFR, §192.615 - Emergency plans.
   (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
      (6) Emergency shutdown and pressure reduction in any section of the operator's pipeline system necessary to minimize hazards to life or property.

   COMMENTS: During this inspection the Operator was unable to provide a process in their emergency plan for how, when or where an emergency shutdown would take place in any section of their system. Also, the Operators emergency valves listed in their emergency plan do not identify which valve or valves shuts off a particular pipeline section in the event of an emergency.

   PROBABLE VIOLATION: The City of Quitman has not planned and developed a shutdown process for any section of their system as needed in the event of an emergency.

2. 49CFR, §192.615 - Emergency plans.
   (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
      (4) The availability of personnel, equipment, tools, and materials, as needed at the scene of an emergency.

   COMMENTS: During this inspection the Operators Emergency Plan could not provide a list of materials available as needed at the scene of an emergency. Also, Operator needs to add valve wrench to equipment list.

   PROBABLE VIOLATION: The City of Quitman has failed to include procedures for the availability of materials and equipment available if needed at the scene of an emergency.

3. 49CFR, §192.615 - Emergency plans

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
(10) Beginning action under §192.617, if applicable as soon as after the end of the emergency as possible.

COMMENTS: Operator failed to perform accident investigations into two pipeline emergencies that occurred due to excavation damages in years 2018 and 2020. Operator has a process and a records form to be used in appendix Q called "After Action Review Guidance" to document their emergency investigations.

PROBABLE VIOLATION: Operator failed to perform an accident investigation for the purpose of determining the causes of the failure and minimizing the possibility of recurrence.

4. 49CFR, §192.615 - Emergency plans
(b) Each operator shall:
(1) Furnish its supervisors who are responsible for emergency action a copy of that portion of the latest edition of the emergency procedures established under paragraph (a) of this section as necessary for compliance with those procedures.

COMMENTS: Operator has not provided its personnel listed in appendix O a copy of their emergency plan as stated in their procedures Section IX page 19. In addition the Operator has not listed in appendix O their contract personnel who may be responsible to perform emergency response as ever having received a copy of their emergency plan.

PROBABLE VIOLATION: Operator failed to provide those responsible for emergency response a copy of their procedures as required under Part 192.615(b)(1).

5. 49CFR, §192.615 - Emergency plans
(b) Each operator shall:
(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

COMMENTS: Operator has not provided training for all of their personnel who receive after hour emergency calls on their process of notifying the caller of the safety precautions to take if gas is inside or outside a building. Also, the Operator has not provided training to their contract personnel who are on call and provide emergency response.

PROBABLE VIOLATION: Operator has failed to meet the requirements of emergency plan training as stated in Part 192.615(b)(2).

6. 49CFR, §192.615 - Emergency plans
(b) Each operator shall:
(3) Review employee activities to determine whether the procedures were effectively followed in each emergency.

COMMENTS: The Operator failed to follow their Emergency Plan in Section VIII, Paragraph 1, after a 3rd party damages occurred on their system in calendar years 2018 and 2020. Operator had no

documentation during this inspection that they had reviewed their employee's actions to determine if their procedures were followed.

PROBABLE VIOLATION: The City of Quitman failed to perform the requirements of Part 192.615(b)(3) and their emergency procedures.

7. 49CFR, §192.615 - Emergency plans
   (c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:
      (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;
      (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;
      (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and,
      (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

   COMMENTS: Operator has not provided liaison to all the public officials in their service area. Such as electric, water, telecom, and cable. Also, interviews conducted with the Fire Chief of Quitman indicated that they have not receive liaison as required under 192.615 (c) from the Operator. Operator provided a document with the requirements of 192.615(c) but it does not identify the types of emergencies that are to be communicated with the emergency officials.

   PROBABLE VIOLATION: The City of Quitman failed to perform liaison with all required public officials in their service area for emergency preparedness.

NOTICE OF AMENDMENT

As a result of this inspection Staff found that the Operator was in probable violation of the minimum federal safety standards; specifically,

49CFR §192.605 - Procedural manual for operations, maintenance, and emergencies
(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

PROBABLE VIOLATION: Based on the observed deficiencies indicated in this report, Staff determined that the Operator has failed to prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response.

The specific code sections, and noted deficiencies are identified below:

1. 49 CFR, §192.181- Distribution line valves.
   (a) Each high-pressure distribution system must have valves spaced so as to reduce the time to shut down a section of main in an emergency. The valve spacing is determined by the operating pressure, the size of the mains, and the local physical conditions.

STAFFS COMMENTS: During this inspection the Operator was unable to provide a process for the placement of distribution line valves in accordance with Part 192.181. Because the Operator could not define where these valves are required Staff could not determine if the Operator could perform an emergency shutdown and/or pressure reduction in any section of their pipeline system if it were necessary to minimize hazards to life or property as required by §192.615(a)(6)

Because the Operator could not demonstrate an actual process of how they determine where to install specific valves, Staff cannot determine if the Operator has complied with the requirements of §191.181(a), or if they can meet the requirements of §192.615(a)(6).

REQUIRED AMENDMENT: The City of Quitman must amend their procedures to address the placement of distribution line valves for their system.

2. 49 CFR, §192.615– Emergency Plans
   (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
      (8) Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.

   STAFFS COMMENTS:
   1) During this inspection Staff found no process had been established and planned with the Operators fire, police and public officials in order to maintain communication in the event of a natural disaster as required under 192.615(a)(8). When Staff asked Operator personnel they stated they had no way of maintaining communication if they lost their cell or land line service. They did state that the police department had 2-way radio frequency service and that they possibly could use it if needed. Staff advised Operator personnel to pursue that option and plan with their fire, police and public officials to ensure it would work with them and to implement the process in their emergency plan in section V. of their plan for natural disasters.

   2) Staff found no process for Operator personnel to notify their 911 call center for any community/jurisdiction where the operator's pipelines are located when a possible pipeline rupture is indicated.

   REQUIRED AMENDMENT:
   1) The City of Quitman must amend their procedures to ensure that they are notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.

   2) The City of Quitman must amend their procedures to instruct personnel to notify their 911 call center when a possible pipeline rupture is indicated.

3. 49 CFR, §192.615– Emergency Plans
   (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
      (3) Prompt and effective response to a notice of each type of emergency, including the following:
         (i) Gas detected inside or near a building.
         (ii) Fire located or near or directly involving a pipeline facility.
         (iii) Explosion occurring near or directly involving a pipeline facility.

(iv) Natural disaster.

STAFFS COMMENTS: During this inspection Staff was told by Operator personnel that one person, Mr. Willie Cody, was primarily on call 24-7 for the Operators emergency response. However, Staff found that in the Operators emergency plan for after-hours there was a listing of four persons. The first to be contacted was Mr. Willie Cody, listed as 1A with instructions to attempt contact at 5 minute intervals for a maximum of two tries if no contact then proceed to the next person Mr. Eddie Harp with Harp & Associates listed as 2A with the same instructions on attempting contact. The proceed to a third person who is listed Mr. Raphael Maddox the City Manager as 3A with the same instructions on intervals and instructs to contact person on 4A but no one is listed with same instructions until you get to Ms. Zinda McDaniel who is listed on row 1B. However, Mr. Raphael Maddox or Ms. Zinda McDaniel have been qualified in responding to gas leaks for emergency purposes.

Also, the Operator has no process on what types of equipment they are to respond with to a pipeline emergency. Operator emergency plan contact list for persons on call that was distributed to their receiving personnel for normal work hours and after hours was found not consistent and the plan doesn't have a process for providing to the persons receiving the emergency calls who is currently available for that particular day, night or weekend in the event one of persons on the contact list is not able to respond due to vacation, sickness or doctor appointments etc. Also, Operator has contract personnel who are responsible for emergency response and there was no process for notifying them and confirming that they are available and on standby for emergency response.

REQUIRED AMENDMENT: The City of Quitman must amend their procedures to instruct persons receiving and responding to any type of pipeline emergencies on who will actually be on call for the City of Quitman at any given time if the primary contact Mr. Willie Cody is unavailable. Also, include process for contacting the person who will be covering for Mr. Willie Cody and let them know they are on call so that they are prepared to response promptly.

4. 49 CFR, §192.615– Emergency Plans
   (c) Each Operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:
   (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;
   (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency and means of communication;
   (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and
   (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

   STAFFS COMMENTS: Operator's procedures for public officials does not include other utilities in their service area.

   REQUIRED AMENDMENT: The City of Quitman must amend their procedures to include electric and other utilities in their service area as other public officials for the purpose of liaison.

5. 49CFR, §192.455 External corrosion control: Buried or submerged pipelines installed after July 31, 1971.

(e) Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved.

STAFFS COMMENTS: The City of Quitman's O&M Procedures for buried or submerged pipelines installed after July 31, 1971 do not address the requirements of §192.455(e). Staff notes that Section 9-F of their O&M procedures indicates that they do not have buried or submerged amphoteric metal, however, Staff found no indication that the City of Quitman prevents the installation of aluminum in their system.

REQUIRED AMENDMENT: The City of Quitman must amend their procedures to address the requirements of §192.455(e).

WARNING LETTER

1. 49 CFR, §192.605- Procedural manual for operations, maintenance, and emergencies
   (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
      (3) Making construction records, maps, and operating history available to appropriate operating personnel.

   STAFFS COMMENTS: During this inspection Staff asked the Operators personnel if they had maps of their natural gas distribution system. Operator has not updated their system maps since 1979. Staff found that the Operator has added pipeline to their system since that time.

   PROBABLE VIOLATION: The City of Quitman has failed to provide adequate maps of their system and make them available to all of their appropriate operating personnel for them to use during their operations, maintenance and emergency response under Part 192.605(b)(3).

2. 49 CFR, §192.805 - Qualification program.
   Each operator shall have and follow a written qualification program. The program shall include provisions to:
   (b) Ensure through evaluation that individuals performing covered tasks are qualified.

   STAFFS COMMENTS: During this inspection Staff interviewed the City of Quitman's Fire Chief and discovered that the Operator was using him to perform covered Task #0301 (Manually Opening and Closing Valves) for turning gas on to customers. Staff found no documentation that the Fire Chief had been qualified to perform this covered task.

   PROBABLE VIOLATION: The City of Quitman has failed to follow their qualification plan to ensure thru evaluation that individuals performing covered tasks are qualified in accordance with Part 192.805.

ITEMS OF CONCERN

1. 49 CFR, §192.615 - Emergency plans
   (b) Each operator shall:

(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

STAFFS CONCERN: The Operators process for emergency training of personnel does not include a frequency for individual refresher training. The City of Quitman should require and track individual employee training frequencies.

2. 49CFR, §192.723 – Distribution systems: Leakage surveys.
   (a) Each Operator of a distribution system shall conduct periodic leakage surveys in accordance with this section.
   (b) The type and scope of the leakage control program must be determined by the nature of the operations and the local conditions, but it must meet the following minimum requirements:
      (1) A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in *gas*, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.
      (2) A leakage survey with leak detector equipment must be conducted outside business districts as frequently as necessary, but at least once every 5 calendar years at intervals not exceeding 63 months. However, for cathodically unprotected distribution lines subject to 192.465(e) on which electrical surveys for corrosion are impractical, a leakage survey must be conducted at least once every 3 calendar years at intervals not exceeding 39 months.

   STAFFS CONCERN: Staff found four gas service locations were Operators contractor performing their leakage survey indicated that the residence was locked. The City of Quitman must take remedial action and perform a leakage survey on these residences before monitoring time period expires.

3. 49 CFR, §192.463– External corrosion control: Cathodic Protection
   (a) Each cathodic protection system required by this subpart must provide a level of cathodic protection that complies with one or more of the applicable criteria contained in appendix D of this part.

   STAFFS CONCERN: During this inspection Staff performed a field inspection on the cathodic protection system and found their criteria for measurement of -.850mv was not being achieved at the following locations. 112 N. Jefferson, N. Beulah Church MLK, and Take Station outlet.

Staff also conducted three (3) Protocol nine inspections on Mr. Willie Cody, for the following covered tasks:
1. 1241 - Outside Leak Investigation.
2. 1291 – Gas Line Locating.
3. 1211 - Odorization Periodic Sampling.

Staff found that the Operator's personnel qualification records were up to date and no issues were found during the field observations.

PROPOSED CIVIL PENALTY

Under Commission Rule 515-9-1.01, by virtue of the authority vested in the Commission by law and pursuant to orders issued by the Commission on May 4, 1967, July 6, 1967, April 23, 1968, and October 29, 1970, all Rules and Regulations prescribed by the United States Department of Transportation applicable to the "Transportation of Natural and Other Gas by Pipeline: Minimum Safety Standards" (C.F.R. 49, Parts 191 and 192) are by this Rule made the Rules and Regulations of the Georgia Public Service Commission for the safe installation and operation of all natural gas transmission and distribution facilities by companies subject to the jurisdiction of the Commission within this State.

Under Commission Rule 515-9-3-.08 (Written Formal Notice of Violation), the Commission may propose a civil penalty in conjunction with this notice of probable violation. Further, the City of Quitman is subject to civil penalties under O.C.G.A. § 46-2-91(b) which states that: Any operator which violates any rule or regulation of the commission prescribed pursuant to subsection (i) of Code Section 46-2-20, or which fails, neglects, or refuses to comply with any order after notice thereof, shall be liable to a penalty not to exceed the maximum penalties provided for in 49 C.F.R. Section 190.223.

Staff has reviewed the circumstances surrounding the probable violations cited in this report and has recommended the civil penalty/penalties listed below. Please note that this recommended amount is less than the amount authorized by Georgia law.

Item #	Code / Rule	Description	Proposed Penalty
NOPV #3	192.615(a)(10)	Failure Investigation	$5,000.00
NOPV #4	§192.615(b)(1)	Supervisor Emergency Training	$5,000.00
NOPV #5	§192.615(b)(2)	Emergency Plan Training	$5,000.00
TOTAL PROPOSED PENALTY			$15,000.00

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 QUITMAN GAS DEPARTMENT

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37077

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	
☐ Notice of Probable Violation (NOPV)	☐ New	☐Continuing	☐ Yes	☐ No
☐ Notice of Amendment (NOA)	☐ New	☐Continuing	☐ Yes	☐ No
☐ Warning Letter	☐ New	☐Continuing	☐ Yes	☐ No
☐ Letter of Concern	☐ New	☐Continuing	☐ Yes	☐ No
☐ Observed Issue	☐ New	☐Continuing	☐ Yes	☐ No
☐ 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):
   1. ☐ Written statement indicating that corrective measures have achieved Compliance or
   2. ☐ Written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated.

B. Response for **NOA**:
   1. ☐ 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
   2. ☐ Not Contested: Explanation, information, or other material believed to warrant modification of the NOA in whole or in part; or
   3. ☐ 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: _____ Date:_____
Name / Title

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:_____

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:	)	
	)	
Probable Violation(s) Report with Civil	)	**DOCKET NO. 37077**
Penalty; Notice of Amendment;	)	
Warning Letter; Letter of Concern	)	
City of Quitman Gas Department	)	
Inspection AT22-013 on March 21, 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 Quitman 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

* Raphel Maddox, City Manager
City of Quitman Gas Department
P.O. Box 208
Quitman, GA 31643-0208
maddox@quitmanga.gov

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

Respectfully Submitted this 14th day of November 2022:

Cathy Nesbitt

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