COMMISSIONERS

TRICIA PRIDEMORE , Chairman
TIM G. ECHOLS , Vice-Chairman
FITZ JOHNSON
LAUREN "BUBBA" McDONALD
JASON SHAW

FILED
JAN 24 2023
EXECUTIVE SECRETARY
G.P.S.C.

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

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

244 Washington Street, SW
Atlanta, GA 30334-5701

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

DOCKET# 39447
DOCUMENT# 192865

Docket No. 39447

Crisp County Power Commission
202 South 7th St, PO Box 1218
Cordele, GA 31010-1218

REF: Inspection of Right-of-Way Inspection # DJ22-051

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Ms. Becky Fitzgibbons

On October 17, 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 DJ22-051 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. 39447 in your response.

Please let me know if there are any questions concerning this report at (404) 985-4271 or mthebert@psc.ga.gov. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle Thebert

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

COMMISSIONERS

TRICIA PRIDEMORE , Chairman
TIM G. ECHOLS , Vice-Chairman
FITZ JOHNSON
LAUREN "BUBBA" McDONALD
JASON SHAW

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

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

244 Washington Street, SW
Atlanta, GA 30334-5701

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

REPORT OF NATURAL GAS SAFETY

INSPECTION NO: DJ22-051

OPERATOR: Crisp County Power Commission

INVESTIGATOR: Daphne Jones

INSPECTION DATE: October 17, 2022 REPORT MAILED DATE: January 23, 2023

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

1. PURPOSE OF INSPECTION

To perform a specialized inspection on the Operator's transmission pipeline right-a-way at 1064 Flournoy Rd., Warwick, Ga.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
Under Consent Agreement	Operator is under a Consent Agreement.	AT18-044	11/14/2018

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CRISP COUNTY POWER COMMISSION / SPECIAL PROJECT INSPECTION
INSPECTION NUMBER DJ22-051 / DOCKET NUMBER 39447

From October 17-20, 2022, Commission Staff reported to Crisp County Power Commission to perform a specialized inspection concerning the transmission right-of-way (ROW) at 1064 Flournoy Rd, Warwick, Ga.

During the inspection, the Operator was represented by:
Ms. Tina Bearden – Gas Superintendent Cordele / Consultant
Mr. William Gibbs – Distribution Mechanic/ Transmission ROW
Mr. Bobby Patterson – Transmission Technician CCPC
Mr. Brain Fennel – Transmission Technician CCPC

Commission Staff was represented by:
Ms. Daphne Jones – Lead Inspector
Mr. Daniel Clemmons – Pipeline Safety Inspector

At the time of this inspection the Crisp County Power Commission (Operator) transmission system had two (2) previously existing probable violations; Staff has reviewed theses violations under Review of Operator Response report (Ref: Inspection Number DJ22-048).

ITEMS OF CONCERN

1. CODE REQUIREMENT: 49CFR §192.705 Transmission lines: Patrolling.
   (a) Each operator shall have a patrol program to observe surface conditions on and adjacent to the transmission line right-of-way for indications of leaks, construction activity, and other factors affecting safety and operation.

2. CODE REQUIREMENT: 49CFR §192.613 Continuing surveillance.
   (a) Each operator shall have a procedure for continuing surveillance of its facilities to determine and take appropriate action concerning changes in class location, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions.

   STAFFS COMMENTS: On September 26, 2022, the Operator emailed Staff documentation showing a copy of their revised patrolling procedure in the O&M manual, a blank copy of their revised patrolling documentation form (Appendix V-2), and a work order form for corrective actions. On October 11, 2022, the Operator emailed Staff completed patrolling records for year 2019, 2020, 2021, and 2022 for Crisp County Power.

   In reviewing the documentation sent by the Operator, Staff encountered a concern with the Operators transmission pipeline facility. According to Appendix V-2, Transmission Patrolling Report Form year 2019, the Operator noted that at address 1064 Flournoy Rd, Warwick, Ga the homeowner has built a carport over the existing transmission gas line. This is an existing 4-inch steel transmission pipeline

   During this inspection, Staff reviewed the Transmission Patrolling records from 2019-2022 for Crisp County Power Commission. This is a 13-mile, 4-inch steel transmission pipeline, in a class 3 location, with a Potential Impact Radius of 59.20 feet. The Operator stated on this patrolling form that there was evidence of encroachment at 1064 Flournoy Rd, Warwick, Ga. The homeowner had built a free-standing carport over the transmission gas pipeline. Staff travelled to the site to investigate the carport encroachment over the transmission pipeline to see if it is affecting safety and operation of the transmission pipeline and if it restricts access to the pipeline in case of an emergency.

Additional questions were discussed onsite with the CCPC:

1. When was the house at 1064 Flournoy Rd built?
2. When was the carport built? Did the homeowner call 811 before they started digging for a new carport?
3. Is the carport actually built over the existing transmission line? Was the homeowner aware that a transmission line existed on their property?
4. Are there any clear pipeline markers across the property?
5. How close is the transmission line to the house at 1064 Flournoy Rd?
6. What Class location?
7. What is Crisp County Power Commission going to do about this issue?

The following information was noted:

- The house was constructed in 1996.
- The carport was constructed in 2019. The carport is not attached to the residence. It is not clear if 811 was contacted prior to the excavation for the carport beginning.
- The Operator stated that this location is in a Class 3 area with a potential impact radius of 59.20 feet.
- The transmission gas pipeline runs diagonally under the concrete driveway, through the yard, and across Blackshear Lake. It appears that the majority of the house is within the Operators stated potential impact radius. There are pipeline markers in place, but Staff could not determine if markers were present at the time the house and carport were constructed.
- In case of an emergency, the transmission pipeline near the driveway can only be accessed by breaking up the concrete and/or removing the carport.
- Total feet of concrete covering the transmission pipeline is about 4-6 feet.
- Carport distance from the house was not measured but appears to be about 4-5 feet.
- The Operators records indicate that once this carport was discovered it was noted that someone would need to check their easement to determine if any action should be pursued; however, there is no indication that any action has ever been taken.

The Operator is advised that Staff will return at a later date to review their class location study and high consequence area determinations to see if the Operator is subject to the requirements of 49CFR, Subpart O - Gas Transmission Pipeline Integrity Management.

STAFFS CONCERN: Staff is concerned that the Operators patrolling, and continuing surveillance programs are deficient. Staff is concerned with the fact that this carport was apparently constructed over the Operators transmission pipeline facility, and they had no knowledge of it happening until it was completed. Staff is also concerned that it is not clear if this line was subjected to any damage which could potentially affect its operation, or if the Operator has pursued any actions to make these determinations.

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:	)	
	)	
Letter of Concern	)	**DOCKET NO. 39447**
Crisp County Power Commission	)	
Inspection DJ22-051 on October 17, 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 *Crisp County Power Commission* 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

*Becky Fitzgibbons, Interim General Manager
Crisp County Power Commission
202 South 7th Street
P.O. Box 1218
Cordele, GA 31010-1218
mivey@crispcountypower.com

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

Respectfully Submitted this 26th day of January 2023:

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