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

FILED
FEB 01 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 No. 37090

DOCKET# 37090
DOCUMENT# 193089

City of Thomson Gas System
210 Railroad Street
Thomson, GA 30824

REF: Follow Up Inspection # JS22-006

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Kenneth Usry

On March 22, 2022, a representative of the Georgia Public Service Commission Pipeline Safety/Facilities Protection Office conducted an on-site inspection of your gas system and found that previously identified probable violation(s) of the Pipeline Safety Regulations have either been cleared or are continuing, as identified below.

- ☐ Previously existing probable violation(s) has/have been cleared.
- ☒ Previously existing probable violation(s) still exist.
- ☐ Additional Enforcement
  - ☐ Notice of Proposed Violation
  - ☐ Notice of Proposed Violation with Proposed Civil Penalty
  - ☐ Warning Letter
  - ☐ Letter of Concern
  - ☐ Observed Issue
- ☐ Consent Agreement Pending

The enclosed inspection report numbered JS22-006 is provided for your information and file.

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. 37090 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: JS22-006

OPERATOR: City of Thomson Gas System

INVESTIGATOR: Jason Smith

INSPECTION DATE: March 22, 2022 REPORT MAILED DATE: January 31, 2023

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 follow-up inspection of the Operator's previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.195(a)	General requirements. Except as provided in §192.197, each pipeline that is connected to a gas...	JS17-013	5/8/2017
192.473(a)	Each operator whose pipeline system is subjected to stray currents shall have in effect a...	JS17-013	5/8/2017
192.473(b)	Each impressed current type cathodic protection system or galvanic anode system must be designed...	JS17-013	5/8/2017
Under Consent Agreement	Operator is under a Consent Agreement.	AT20-002	1/8/2020
192.616	Public education.	JH20-010	2/24/2020

3. CLEARED VIOLATIONS

Cleared on 3/22/2022

Violation	Description	Inspection#	Date
192.463(a)	Each cathodic protection system required by this subpart must provide a level of cathodic...	JS17-013	5/8/2017

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On March 22, 2022 Pipeline Safety Staff reported to the City of Thomson Gas System to perform a follow-up inspection of the Operator's previously existing probable violations.

During this inspection, the Operator was represented by:
Rodney Dunaway - Natural Gas Director
Chris Cawley - MGAG/SRCS (Consultant)

Commission Staff was represented by:
Jason Smith - Lead Inspector
Daphne Jones - Pipeline Safety Inspector

At the time of this inspection, the City of Thomson Gas System was under five (5) previously existing probable violations. Staff reviewed these probable violations the Operator and determined that:

PROBABLE VIOLATIONS CONTINUING

1. In regard to the probable violation of 49CFR §192.195(a) which was cited under inspection #JS17-013, in that inspection Staff stated that: "The Operator does not have pressure relieving and/or pressure limiting devices off its tap station line, with Southern Natural, which is the City's take point."

   OPERATOR RESPONSE: In their response letter to Inspection Number JS17-013, dated October 5, 2017 the City of Thomson stated that: "Thomson will install overpressure protection at its take point by March 30, 2018."

   1st FOLLOW-UP INSPECTION: On May 21, 2018, Staff conducted follow-up inspection #DJ18-018. In that inspection report Staff stated: Staff verified that no overpressure protection has been installed at the take point. The Operator stated that their cathodic protection contractor has found interference with Southern Natural/Kinder Morgan's piping. As a result, the contractor has recommended that the Operator do further testing; after the completion of this testing, the Operator will approach Southern Natural with the prospect of moving the gate station north of its current location. Operator stated this would eliminate not only the interference issue, but also give them a new station with relief.

   OPERATOR RESPONSE: In their response letter to Inspection Number DJ18-018, dated February 28, 2019 the City of Thomson stated that: "By May 15, Thomson will complete the design of its new gate station, after which a schedule for bidding, contracting, and construction will be developed. Thomson will provide this schedule to Staff by June 1."

   2nd FOLLOW-UP INSPECTION: On January 13, 2020, Staff conducted follow-up inspection #AT20-002. In that inspection report Staff stated: "During this inspection, (AT20-002) Staff found that the Operator is still in progress of completing the new City take point station."

   OPERATOR RESPONSE: In their response letter to Inspection Number AT20-002, dated July 29, 2020 the City of Thomson stated: "As reported in Thomson's quarterly update of June 2, 2020, Thomson is waiting for Southern Natural/Kinder Morgan to approve an easement, which, according to Southern Natural, should happen soon. Upon approval of the easement, Thomson's contractor will be released to begin work."

3rd FOLLOW-UP INSPECTION: On October 22, 2020 Staff completed an inspection on the City of Thomson Natural Gas System's drug & alcohol plan under inspection #DJ20-028. Since this inspection was not conducted with gas department employees, but with the city's Designated Employer Representative (DER) Pipeline Safety Staff did not follow-up with the Operator's previously existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection #DJ20-028, dated December 22, 2020 the Operator stated that: "As reported in Thomson's quarterly update during the virtual Informal Conference held on December 17, 2020, with the Director, Thomson's contractor is in the process of submitting the final paperwork to Kinder Morgan in preparation for commencement of the take station replacement project. Thomson's contractor will begin this project after the first of the year with completion expected by May 1, 2021. Thomson will notify the Director when the official start date is determined."

OPERATOR UPDATE: On November 5, 2021, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give an update. The Operator had a pre-construction meeting with Southern Natural (a/k/a Kinder Morgan) about the take station replacement project. It is Thomson's hope that the project could get completed in a few weeks.

OPERATOR UPDATE: On January 18, 2022, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give their first 2022 status update. The Operator states: "Now that we have Southern Natural's requested paper work completed, we are waiting for our contractor to schedule the take station replacement project. He is trying to finish up another large project in a sister city; he hopes to begin our project in April. As you know, this project will correct the need for a relief and the cathodic protection interference issues that we have with Southern Natural."

4th FOLLOW-UP INSPECTION: On March 22, 2022 Pipeline Safety Staff reported to the city of Thomson to perform a follow-up inspection. (JS22-006) During this inspection the Operator informed Staff that as their January 2022 quarterly update stated, they anticipate the take station project will begin in the coming weeks (May/June 2022). Pipeline Safety Staff will be kept updated.

Staff determined that this violation could not be cleared at this time.

2. In regard to the probable violation of 49CFR §192.463(a) which was cited under inspection #JS17-013, in that inspection Staff stated: "The Operator failed to ensure that its cathodic protection system provided a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D as required by §192.463(a), and with the stated criteria from their O&M Procedures Manual."

   OPERATOR RESPONSE: In their response letter to Inspection Number JS17-013, dated September 27, 2017, the City of Thomson stated that: "Thomson personnel have worked with two cathodic protection contractors over the past two years to address low readings; however, problems remain. Thomson recently authorized additional funds for contract services with a different contractor and is currently locating and clearing shorts, after which Thomson will determine the next steps to be taken. Thomson will develop an overall cathodic protection improvement plan by October 31, 2017, and will provide an update to Staff."

   1st FOLLOW-UP INSPECTION: On May 21, 2018, Staff conducted follow-up inspection #DJ18-018. In that inspection report Staff stated: Staff reviewed O&M manual, section 9 and Appendix J-1,

showing CP criteria of -850mV and 100mV. The Operator revised its O&M manual on May 3, 2018 stating that both -850 and 100mV shift criteria will be used. The areas using the 100mV shift criteria have been identified and noted in O&M Manual and Appendix J-1. The City of Thomson Contracted with C&C Coating/Corrosion Solutions to develop a Cathodic Protection Improvement Plan. Staff reviewed the Cathodic Protection improvement plan submitted October 9, 2017, and the annual corrosion survey and observed that according to the Operators records, all test points meet the Operators established cathodic protection criteria, with the exception of the readings of the area at the Wrens/Southern Gas Take Station, which are being affected by apparent interference from Southern Co. Gas.

OPERATOR RESPONSE: In their response letter, dated February 28, 2019 the City of Thomson stated that: "As stated in this Report, the remaining low cathodic protection readings are in the area of Thomson's take station and are being affected by interference currents. The upcoming replacement of Thomson's take station will address the interference currents and low CP. By May 15, Thomson will complete the design of its new gate station, after which a schedule for bidding, contracting, and construction will be developed. Thomson will provide this schedule to Staff by June 1."

2nd FOLLOW-UP INSPECTION: On January 13, 2020, Staff conducted follow-up inspection. (AT20-002) In that inspection report Staff stated: "During this inspection, (AT20-002) Staff found that the Operator is currently working to complete their new Take Station which will help in bringing their low cathodic protection readings into compliance."

OPERATOR RESPONSE: In their response letter to Inspection Number AT20-002, dated July 29, 2020 the City of Thomson stated: "As reported in Thomson's quarterly update of June 2, 2020, Thomson is waiting for Southern Natural/Kinder Morgan to approve an easement, which, according to Southern Natural, should happen soon. Upon approval of the easement, Thomson's contractor will be released to begin work."

3rd FOLLOW-UP INSPECTION: On October 22, 2020 Staff completed an inspection on the City of Thomson Natural Gas System's drug & alcohol plan under inspection #DJ20-028. Since this inspection was not conducted with gas department employees, but with the city's Designated Employer Representative (DER) Pipeline Safety Staff did not follow-up with the Operator's previously existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection Number DJ20-028, dated December 22, 2020 the Operator stated that: "As reported in Thomson's quarterly update during the virtual Informal Conference held on December 17, 2020, with the Director, Thomson's contractor is in the process of submitting the final paperwork to Kinder Morgan in preparation for commencement of the take station replacement project. Thomson's contractor will begin this project after the first of the year with completion expected by May 1, 2021. Thomson will notify the Director when the official start date is determined."

OPERATOR UPDATE: On November 5, 2021, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give an update. Apparently, the Operator had a pre-construction meeting with Southern Natural (a/k/a Kinder Morgan) about the take station replacement project. It is Thomson's hope that the project could get completed in a few weeks.

OPERATOR UPDATE: On January 18, 2022, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give their first 2022 status update. The Operator states: "Now that we have Southern Natural's requested paper work completed, we are waiting for our contractor to

schedule the take station replacement project. He is trying to finish up another large project in a sister city; he hopes to begin our project in April. As you know, this project will correct the need for a relief and the cathodic protection interference issues that we have with Southern Natural."

4th FOLLOW-UP INSPECTION: On March 22, 2022 Pipeline Safety Staff reported to the city of Thomson to perform a follow-up inspection. (JS22-006) During this inspection the Operator informed Staff that as their January 2022 quarterly update stated, they anticipate the take station project will begin in the coming weeks (May/June 2022). Pipeline Safety Staff will be kept updated.

Staff determined that this violation could not be cleared at this time.

3. In regard to the probable violation 49CFR §192.473(a) which was cited under inspection #JS17-013, in that inspection Staff stated that: the "Operator failed to demonstrate that it performed testing to ensure its pipeline system is not subjected to stray currents from potential sources of interference as required by §192.473(a)."

   OPERATOR RESPONSE: In their response letter to Inspection Number JS17-013, dated October 5, 2017 the City of Thomson stated that: "In the fall of 2016, Thomson performed testing for interference currents in the area where its facilities cross Wrens' facilities. Thomson's cathodic protection professional will evaluate these test results and will also consult with Kendell-Morgan personnel to determine if data is available for the area around Thomson's take station. Based on the previous testing and availability of other data, Thomson will determine whether additional testing is necessary and, if so, conduct the testing by December 31, 2017."

   1st FOLLOW-UP INSPECTION: On May 21, 2018, Staff conducted follow-up inspection #DJ18-018. In that inspection report Staff stated: "Operator provided no records to demonstrate that it had tested for the presence of interference currents in Jefferson County where its pipeline interconnects with the Southern Natural Gas pipeline on Hwy 17, and which runs in parallel with the City of Wrens' pipeline on Hwy 17 and Howard Mill Rd. Staff reviewed an email dated April 5, 2018 requesting a meeting with Southern Natural Gas to review interference issues at the Thomson/Southern Gas Co. Station. Southern Gas has not responded, and testing cannot be completed until Southern Gas Cooperates. Operator stated that C&C Services is developing a plan to address stray current issues attacking the natural gas system."

   OPERATOR RESPONSE: In their response letter to Inspection Number DJ18-018, dated February 28, 2019 the City of Thomson stated that: "Thomson has tested for the presence of interference currents and determined that these currents exist. The upcoming replacement of Thomson's take station will address the interference currents and low CP. By May 15, Thomson will complete the design of its new gate station, after which a schedule for bidding, contracting, and construction will be developed. Thomson will provide this schedule to Staff by June 1."

   2nd FOLLOW-UP INSPECTION: On January 13, 2020, Staff conducted follow-up inspection. (AT20-002) In that inspection report Staff stated: "During this inspection, (AT20-002) Staff found that the Operator is in progress of completing the new City take point station."

   OPERATOR RESPONSE: In their response letter to Inspection Number AT20-002, dated July 29, 2020 the City of Thomson stated: "As reported in Thomson's quarterly update of June 2, 2020, Thomson is waiting for Southern Natural/Kinder Morgan to approve an easement, which, according to

Southern Natural, should happen soon. Upon approval of the easement, Thomson's contractor will be released to begin work."

3rd FOLLOW-UP INSPECTION: On October 22, 2020 Staff completed an inspection on the City of Thomson Natural Gas System's drug & alcohol plan under inspection #DJ20-028. Since this inspection was not conducted with gas department employees, but with the city's Designated Employer Representative (DER) Pipeline Safety Staff did not follow-up with the Operator's previously existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection #DJ20-028, dated December 22, 2020 the Operator stated that: "As reported in Thomson's quarterly update during the virtual Informal Conference held on December 17, 2020, with the Director, Thomson's contractor is in the process of submitting the final paperwork to Kinder Morgan in preparation for commencement of the take station replacement project. Thomson's contractor will begin this project after the first of the year with completion expected by May 1, 2021. Thomson will notify the Director when the official start date is determined."

OPERATOR UPDATE: On November 5, 2021, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give an update. Apparently, the Operator had a pre-construction meeting with Southern Natural (a/k/a Kinder Morgan) about the take station replacement project. It is Thomson's hope that the project could get completed in a few weeks.

OPERATOR UPDATE: On January 18, 2022, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give their first 2022 status update. The Operator states: "Now that we have Southern Natural's requested paper work completed, we are waiting for our contractor to schedule the take station replacement project. He is trying to finish up another large project in a sister city; he hopes to begin our project in April. As you know, this project will correct the need for a relief and the cathodic protection interference issues that we have with Southern Natural."

4th FOLLOW-UP: On March 22, 2022 Pipeline Safety Staff reported to the city of Thomson to perform a follow-up inspection. (JS22-006) During this inspection the Operator informed Staff that as their January 2022 quarterly update stated, they anticipate the take station project will begin in the coming weeks (May/June 2022). Pipeline Safety Staff will be kept updated.

Staff determined that this violation could not be cleared at this time.

4. In regard to the probable violation of 49CFR §192.473(b) which was cited under inspection #JS17-013, in that inspection Staff stated that the: "Operator could not demonstrate that it performed testing on its impressed current rectifiers to minimize any adverse effects on existing adjacent underground metallic structures as required by §192.473(b)."

OPERATOR RESPONSE: In their response letter to Inspection Number JS17-013, dated October 5, 2017 the City of Thomson stated that: "Thomson's cathodic protection professional will evaluate the rectifiers by December 31. 2017."

1st FOLLOW-UP INSPECTION: On May 21, 2018, Staff conducted a follow up inspection. (DJ18-018) In that inspection Staff stated; "Operator provided no record of testing performed on its impressed current rectifiers to minimize any adverse effects on existing adjacent underground

metallic structures. Per Operator, C&C Services is planning to conduct interference testing in the future."

OPERATOR RESPONSE: In their response letter to Inspection Number DJ18-018, dated February 28, 2019 the City of Thomson stated that: "Thomson has performed tests and determined that its rectifiers have no adverse effect on existing adjacent underground metallic structures. Documentation is available for review."

2nd FOLLOW-UP INSPECTION: On January 13, 2020, Staff conducted follow-up inspection. (AT20-002) In that inspection report Staff stated: "During this inspection, (AT20-002) Operator provided records indicating C&C Services had performed rectifier evaluation and inference testing at Wrens Highway Take Station. As a result Operator found that interference with Southern Natural is occurring at this time. The Operator will resolve this issue by replacing their Take Station and installing 800 foot of 8-inch steel and placing an electro stop. In addition Operator will obtain a bond to Southern Natural pipeline."

OPERATOR RESPONSE: In their response letter to Inspection Number AT20-002, dated July 29, 2020 the City of Thomson stated: "As reported in Thomson's quarterly update of June 2, 2020, Thomson is waiting for Southern Natural/Kinder Morgan to approve an easement, which, according to Southern Natural, should happen soon. Upon approval of the easement, Thomson's contractor will be released to begin work."

3rd FOLLOW-UP INSPECTION: On October 22, 2020 Staff completed an inspection on the City of Thomson Natural Gas System's drug & alcohol plan under inspection #DJ20-028. Since this inspection was not conducted with gas department employees, but with the city's Designated Employer Representative (DER) Pipeline Safety Staff did not follow-up with the Operator's previously existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection #DJ20-028, dated December 22, 2020 the Operator stated that: "As reported in Thomson's quarterly update during the virtual Informal Conference held on December 17, 2020, with the Director, Thomson's contractor is in the process of submitting the final paperwork to Kinder Morgan in preparation for commencement of the take station replacement project. Thomson's contractor will begin this project after the first of the year with completion expected by May 1, 2021. Thomson will notify the Director when the official start date is determined."

OPERATOR UPDATE: On November 5, 2021, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give an update. Apparently, the Operator had a pre-construction meeting with Southern Natural (a/k/a Kinder Morgan) about the take station replacement project. It is Thomson's hope that the project could get completed in a few weeks.

OPERATOR UPDATE: On January 18, 2022, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give their first 2022 status update. The Operator states: "Now that we have Southern Natural's requested paper work completed, we are waiting for our contractor to schedule the take station replacement project. He is trying to finish up another large project in a sister city; he hopes to begin our project in April. As you know, this project will correct the need for a relief and the cathodic protection interference issues that we have with Southern Natural."

4th FOLLOW-UP: On March 22, 2022 Pipeline Safety Staff reported to the city of Thomson to perform an inspection. At this time the Operator informed Staff that as their January 2022 quarterly

updated stated, they anticipate the take station project will begin in the coming weeks (May/June 2022). Pipeline Safety Staff will be kept updated.

Staff determined that this violation could not be cleared at this time.

5. In regard to the probable violation of 49CFR §192.616 which was cited in Inspection Number JH2O-010, that took place on February 24, 2020; in that inspection Staff stated: "Based on the deficiencies identified under Questions 11, 20 and 22 of the Public Awareness Program Effectiveness Inspection Form, the City of Thomson has failed to conduct a Public Awareness Program as required by 49CFR §192.616."

PROGRAM DEFICIENCIES

a) Question #11 - Liaison with Public Officials;

Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?

COMMENTS: Staff stated that "A review of records for the last 4 years indicated that not all 4 counties that the City of Thomson has facilities in were included in the liaison records. Operator is a GPERI member, but did not perform liaison with all other emergency responders in Jefferson County."

OPERATOR RESPONSE: In their response letter to Inspection Number JH20-010, dated July 29, 2020 the Operator stated: "Thomson will ensure that liaison is conducted with Public Officials in all four counties in which Thomson has facilities in the future."

1ST FOLLOW-UP INSPECTION: On August 26, 2020 Pipeline Safety Staff conducted an inspection of the city of Thomson Gas System's drug and alcohol misuse plan for compliance with the minimum federal safety standards under Inspection #DJ20-028. Since this inspection was conducted with the city's Designated Employer Representative and not the gas system personnel, Staff did not review existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection Number DJ20-028, dated December 22, 2020 the Operator stated: "Thomson will ensure that liaison is conducted with Public Officials in all four counties in which Thomson has facilities in the future."

REVIEW OF THOMSON RESPONSE: On January 19, 2021, Staff sent an email to Operator requesting documentation from Thomson Gas System in order to clear this violation under Inspection #DJ21-002. On January 21, 2021, the Operator emailed some documentation to Staff. Staff has reviewed the Operator's response and found that it was not sufficient to address this violation.

2ND FOLLOW-UP INSPECTION: On March 22, 2022 Pipeline Safety Staff reported to the city of Thomson Gas System to follow-up on their previously existing probable violations; under Inspection #JS22-006. The Operator reminded Staff of the documentation they previously sent responding to inspection #DJ21-002. Staff reviewed this documentation, which was e-mail communication from 2020 Thomson Natural Gas had with the city of Wrens Fire Department

Chief; giving a brief description and a map showing the location of their gas system in Jefferson County.

On March 31, 2022 the Operator provided Staff with further documentation that they believe would help in addressing the deficiency. Staff reviewed this information, which was e-mail communications of Thomson Natural Gas providing a brief description and a map showing the location of their gas system in Jefferson County to the five County Commissioners and the City of Wrens Fire Department Chief.

While the communication between Thomson Natural Gas and the city of Wrens Fire Department Chief is a step in the direction to clearing up this particular deficiency, Staff questioned if the Operator has more emergency response officials they need to share information with (ex. Jefferson Co. Office of Emergency Management/Homeland Security, Jefferson Co. 911 Emergency Services, Jefferson Co. Sheriff's Office). In order to help determine what Jefferson County officials Thomson Natural Gas should be communicating with Staff asked the Operator to review their emergency responders and public officials contact list for entities in the Jefferson County area. This contact list would include entities such as the Jefferson Co. EMA Director; the City of Stapleton Mayor; and the City of Wrens Utility Director & City Administrator.

Staff advised the Operator that it appears they have more emergency response officials in Jefferson County to conduct liaison with.

Staff determined that this deficiency could not be cleared at this time.

b) Question #20 - Measure Understandability of Message Content;

Has the operator determined the percentage of each audience that understood and retained the key information?

COMMENTS: Staff stated that "A review of the records indicate the Operator did not include Emergency Officials in their 2019 four year evaluation. Operator is a GPERI member, but did not perform liaison with all other emergency responders in Jefferson County."

OPERATOR RESPONSE: In their response letter to Inspection Number JH20-010, dated July 29, 2020 the Operator stated: "Thomson will ensure that Emergency Officials in all four counties in which Thomson has facilities are included in future."

1st FOLLOW-UP INSPECTION: On August 26, 2020 Pipeline Safety Staff conducted an inspection of the city of Thomson Gas System's drug and alcohol misuse plan for compliance with the minimum federal safety standards under Inspection #DJ20-028. Since this inspection was conducted with the city's Designated Employer Representative and not the gas system personnel, Staff did not review existing probable violations.

OPERATORS RESPONSE: In their response letter to Inspection Number DJ20-028, dated December 22, 2020 the Operator stated: "Thomson will ensure that Emergency Officials in all four counties in which Thomson has facilities are included in future Effectiveness Evaluations."

REVIEW OF THOMSON RESPONSE: On January 19, 2021, Staff sent an email to Operator requesting documentation from Thomson Gas System in order to clear this violation under Inspection #DJ21-002. On January 21, 2021, the Operator emailed some documentation to Staff.

Staff could not verify how the Operator determined the percentage of Understandability for Emergency Officials. Staff has reviewed the Operators response and found that it was not sufficient to address this violation.

2nd FOLLOW-UP INSPECTION: On March 22, 2022 Pipeline Safety Staff reported to the City of Thomson Gas System to follow-up on their previously existing probable violations; under Inspection #JS22-006. As stated above for the deficiency for question #11, Thomson Natural Gas did not conduct a through liaison with all necessary emergency response officials.

Based on this Staff determined that this deficiency could not be cleared at this time.

c) Question #22 - Measure Bottom Line Results;

Has the Operator considered other bottom line measures to determine the affected public's perception of the safety of pipelines?

COMMENTS: Staff stated that "A review of the records indicate the Operator failed to measure the affected public's perception of the safety of pipelines. The Operator advised that their contract survey service (APGA Goal program) revised their survey and failed to include this question. Operator advised that this issue is being addressed with their contractor."

OPERATOR RESPONSE: In their response letter to Inspection Number JH20-010, dated July 29, 2020 the Operator stated: "Thomson has advised APGA GOAL Program personnel of this issue and will work with APGA to resolve the problem."

1st FOLLOW-UP: On August 26, 2020 Pipeline Safety Staff conducted an inspection of the City of Thomson Gas System's drug and alcohol misuse plan for compliance with the minimum federal safety standards under Inspection #DJ20-028. Since this inspection was conducted with the city's Designated Employer Representative and not the gas system personnel, Staff did not review existing probable violations.

OPERATOR RESPONSE: In their response letter to Inspection Number DJ20-028, dated December 22, 2020 the Operator stated: "Thomson has advised APGA GOAL Program personnel of this issue and will work with APGA to resolve the problem."

REVIEW OF THOMSON RESPONSE: On January 19, 2021, Staff sent email to Operator requesting documentation from Thomson Gas System in order to clear this violation under Inspection #DJ21-002. On January 21, 2021, the Operator emailed some documentation to Staff. Staff has reviewed the Operators response and found that it was not sufficient to address this violation.

2nd FOLLOW-UP: On March 22, 2022 Pipeline Safety Staff reported to the city of Thomson Gas System to follow-up on their previously existing probable violations; under Inspection #JS22-006. At the time of this inspection the Operator did not provide a status update on the bottom line measures to determine the affected public's perception of the safety of pipelines.

Staff determined that this deficiency could not be cleared at this time.

FOLLOWUP ON TERMS OF CONSENT AGREEMENT

On December 11, 2019 the Commission approved an order for the Consent Agreement with the City of Thomson recommending a resolution to the issues as discussed in JL14-048, DL15-007, and JS17-013.

Under the terms of the consent agreement:

1. The City of Thomson shall provide quarterly updates to the Director regarding the status of the cathodic protection system.

   FOLLOWUP INSPECTION: During this inspection (JS22-005) Staff determined that the Operator has been submitting updates to the Director as required.

   Staff determined this item is on-going at this time.

2. The City of Thomson shall construct an underground leak survey station, an inside leak survey station, and a residential meter set station at Thomson's training center.
   a. Approximate cost - $5,000
   b. Projected completion date — 120 days after Commission approval of the Consent Agreement

   This item was noted as being complete during Inspection Number AT20-002.

3. The City of Thomson shall become a member of the Georgia Pipeline Emergency Responders Initiative ("GPERI")
   a. Cost - $1,200 per year for 3 years = $3,600
   b. Status — On-going

   This item was noted as being complete during Inspection Number AT20-002.

4. The City of Thomson shall conduct a one-day basic corrosion class for all Thomson gas department employees. The session would be presented by Thomson's cathodic protection contractor, who is a NACE-Certified Technologist and Inspector, using NACE materials. Thomson agrees to invite the Commission Staff to participate in this class.
   a. Approximate cost - $1,000.00
   b. Projected completion date — 90 days after Commission approval of the Consent Agreement

   FOLLOWUP INSPECTION: During this inspection (JS22-006) Staff noted that this training was conducted in Jan of 2020, and several Staff members attended the training.

   Staff determined that this item has been addressed.

5. The City of Thomson shall construct a cathodic protection training facility at Thomson's training center.
   a. Approximate cost - $5,000
   b. Projected completion date — One year after Commission approval of the Consent Agreement

FOLLOWUP INSPECTION: During this inspection (JS22-006) Staff was advised that the Operator has completed the construction of their cathodic protection training facility. Staff requested documentation which demonstrated that the Operator had expenditures in excess of $5,000.00. The Operator provided Staff with documentation for purchase orders, but not for expenditures.

Staff determined that this item has not been addressed.

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 THOMSON GAS SYSTEM

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37090

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:	)	
	)	
Continuing Violation Report	)	**DOCKET NO. 37090**
City of Thomson Gas System	)	
Inspection JS22-006 on March 22, 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 Thomson 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

*The Honorable Kenneth Usry, Mayor
City of Thomson Gas System
210 Railroad Street
Thomson, GA 30824
kenneth.usry@thompson.mcduffie.net

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

Respectfully Submitted this 1st day of February 2023:

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