FILED
FEB 07 2023
EXECUTIVE SECRETARY
G.P.S.C.

DOCKET# 44940
DOCUMENT# 193157

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: ATLANTA GAS LIGHT CO } DOCKET NO. 44940

STAFF'S FIRST SET OF DATA REQUESTS TO
ATLANTA GAS LIGHT COMPANY
REGARDING THE NATURAL GAS EXPLOSION IN CANTON, GEORGIA

TO: PEDRO CHERRY
PRESIDENT
ATLANTA GAS LIGHT COMPANY
TEN PEACHTREE PLACE 19th FLOOR
ATLANTA, GEORGIA 30309

COMES NOW the Georgia Public Service Commission Staff ("Staff") and, pursuant to the authority vested in it by the Georgia Public Service Commission (Commission) pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, "data requests"), to be answered under oath by Atlanta Gas Light Company, ("AGLC" or "Company") or its designated representatives. Pursuant to Commission Utility Rule 515-2-1-.04, Staff requests that an original and five (5) copies be filed with the Executive Secretary of the Commission. If there are any **Trade Secret responses**, please provide an original and five (5) copies in accordance with the procedures under Commission Utility Rule 515-3-1-.11. **Accompanied therewith shall be an electronic version of the filing, which shall be made on a CD ROM containing an electronic version of its filing in Microsoft Word® for text documents or Excel® for spreadsheets.**

Please provide responses on or before 4:00 p. m. on March 9, 2023.

INSTRUCTIONS

a) These requests shall be deemed to be continuing. The Respondent is obliged to change, supplement, and correct all answers to requests to conform to available information; including such information as first comes available to the Respondent after the answers are hereto filed.

b) The answers provided should first restate the question asked and also identify the person(s) supplying the information.

c) All information is to be divulged that is within the knowledge, possession, control, or custody of the Respondent or may be reasonably ascertained thereby.

d) As used herein the "document" included, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, work sheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

Information Request

Docket Number 44940

STAFFS INVESTIGATION OF THE NATURAL GAS EXPLOSION IN CANTON, GEORGIA.

STF-1-1 Please provide a copy of the Meter Activation procedure that was referenced in the Company's January 6, 2023, response to STF-1-3 in Staffs First Set of Data Requests to Atlanta Gas Light Company (Ref. Docket Number 37024) regarding the natural gas explosion which occurred at 11061 East Cherokee Drive in Canton, Georgia on October 16, 2022.

STF-1-2 Please provide a copy of the OQ Procedures referenced in the Company's January 6, 2023, response to STF-1-4 in Staff's First Set of Data Requests to Atlanta Gas Light Company (Ref. Docket Number 37024) regarding the natural gas explosion which occurred at 11061 East Cherokee Drive in Canton, Georgia on October 16, 2022. The procedures identified were:

a. 019A Hazard Control
b. 032E Leak Investigation (Aboveground)
c. 033C AG leak repair
d. 059A Abnormal operating conditions
e. 005B Corrosion control meter sets

STF-1-3 Please provide a copy of the Company's "procedures for Field Services Representatives (FSR)" that are referenced in Div II, Section 22, Item 22.3.11 Gas Service Restoration Procedures.

STF-1-4 Please provide a copy of the Company's meter activation (turn-on) procedures that are referenced in DIV II, Sec 22, Item 22.3.11(b) of the AGLC OPM for compliance with the requirements of 192.615(a)(9).

STF-1-5 Please provide a copy of the complete work order for the leak call which was received for 11061 East Cherokee Drive in Canton, GA on October 16, 2022.

STF-1-6 Please provide documentation for any internal investigations that the company performed at 11061 East Cherokee Drive in Canton, GA:

a. On the date of the incident. (Oct 16, 2022)
b. The day following the incident. (Oct 17, 2022)
c. The investigation that occurred on Oct 31, 2022.

STF-1-7 Please provide copies of any and all phone recordings or transcripts to and/or from the Field Service Representative employee ("Employee") who performed the initial service call and leak repair at this location for the time period following the explosion on October 16 through October 17, 2022.

STF-1-8 Did the Employee enter the residence at any time?

a. If the Employee did not enter the residence, what explanation was provided as to why the Company's procedures were not followed?

b. If the Employee did not enter the residence, when specifically did the company become aware that he did not enter the residence?
c. If the Employee did enter the residence, what specific tasks were performed in order to safely restore the service outage.

STF-1-9 Please provide documentation where the Company reviewed the Employee's leak response activities that were used to determine whether the Company's procedures were promptly and effectively followed as required by 192.615(b)(3).
a. Please identify who performed this review?
b. Please indicate the date and time this review was conducted.

STF-1-10 During the company's telephone conference with Staff on January 11, 2023, they advised that the Employee was no longer employed with the company.
a. Was the Employee terminated by the company or did the Employee resign from the company?
b. What was the Employee's last date of employment?

STF-1-11 Staff is aware that the Employee is no longer employed by the company, however, he is being represented by the company's legal staff. Staff's attorney was advised by the Employee's legal counsel not to contact the Employee.
a. Does the Company have any objection to Staff talking with the Employee regarding this incident. Please explain any objections.
b. If not, please provide any available dates/times where an interview can take place.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE: Atlanta Gas Light Company	)	DOCKET NO. 44940

CERTIFICATE OF SERVICE

I hereby certify that the Staff's First Set of Data Requests in Docket No 44940 were filed with the Commission's Executive Secretary 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 Atlanta Gas Light Company was served a hard copy of the above-stated document by United States Mail.

*Sallie Tanner, Executive Secretary
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Respectfully Submitted this 7 day of February 2023:

Cathy Nesbit

Cathy Nesbit, Administrative Assistant
Georgia Public Service Commission
Facilities Protection Unit
244 Washington Street, SW
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