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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# 37024
DOCUMENT# 192920

Docket No. 37024

AGL - Operations and Engineering
Ten Peachtree Place, NE Suite 1000
Location 1365
Atlanta, GA 30309

REF: Comprehensive Inspection # JH22-001

☒ Certified Mail ☐ Regular Mail ☐ Email

Attention: Mr. Pedro Cherry

On January 10, 2022, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JH22-001 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. 37024 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

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JH22-001

OPERATOR: AGL - Atlanta

INVESTIGATOR: Jack Hewitt

INSPECTION DATE: January 10, 2022 REPORT MAILED DATE: January 25, 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 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
192.465	External corrosion control: Monitoring	JL15-014	3/2/2015
192.615(a)(3)(ii)	Prompt and effective response to a notice of each type of emergency, including the following...	JB21-021	8/5/2021

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JH22-001	1/10/2022
192.615(c)	Each operator shall establish and maintain liaison with appropriate fire, police, and other...	JH22-001	1/10/2022
192.181(b)	Each regulator station controlling the flow or pressure of gas in a distribution system must have...	JH22-001	1/10/2022

5. OTHER RECOMMENDATIONS/COMMENTS

See attached Inspection Report

AGLC ATLANTA SERVICE CENTER/ COMPREHENSIVE INSPECTION
INSPECTION NUMBER JH22-001 / DOCKET NUMBER 37024

On January 10, 2022 Staff and management at AGLC-Atlanta exchanged questions and information to inspect on the comprehensive inspection. During the periods of January 10-13, January 18-20, Staff reviewed AGLC Atlanta Service Center Operator's manuals, records, and field operations. Staff reported to AGLC-SE-GA Service Center on January 24-27, 2022 to conduct the field inspection of AGLC Atlanta facilities.

During this inspection the Operator was represented by:
Rick Slagle - Director of Compliance and Quality Assurance
Ralph McCollum - Lead Compliance Engineer
James Bray - Region Director
Tawanna Hines – Operations Supervisor
Ian Reinhart – Operations Supervisor
Jimmy McKelvey – Operations Manager
Ralph McCollum – Compliance Engineer
Rick Slagle – Director Of Compliance
Melody Morrow – Manager Construction Ops.
Julian Smith - Corrosion Tech
Jeramie Edwards – Corrosion Tech
Roger Jochun - Supervisor Corrosion
Nick Kitzmiller- Supervisor Corrosion

Commission Staff was represented by:
Jack Hewitt – Lead Inspector
Alan Towe – Pipeline Safety Inspector
David Lewis – Pipeline Safety Inspector
Jason Smith – Pipeline Safety Inspector
Kenny Rowe – Pipeline Safety Inspector
Brandt Sweat – Pipeline Safety Inspector

At the time of this inspection Atlanta Gas Light Company Atlanta-GA Service Center was under no previously existing probable violations.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that Atlanta Gas Light Company Atlanta-GA was in probable violation of the minimum federal safety standards; specifically:

1. 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: The Atlanta Gas Light Company Atlanta Service Center failed to follow their procedures required under §192.605(a).

   a. 49CFR §192.465 - External corrosion control: Monitoring.

(d) Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.

COMMENTS: In Division II, Section 8, Item 8.2.2, of the Operators OPM it states: "(a) Potential - Impressed Current (Rectifier) Systems - This criterion is achieved when there is a cathodic potential of at least -0.85 V or more negative as measured between the structure and a saturated copper-copper sulfate reference cell in contact with the soil. Impressed current systems shall be interrupted to obtain both an On and Instant Off reading. Instant Off readings more positive than -0.85 V are inadequate. Steps shall be taken to bring Instant Off readings to at least -0.85 V."

Staff reviewed annual corrosion record readings and found the Sewell Rd. Rect. System, Wharton Rd. Rectifier System, Gilbert Rd. Rect. System, and the Tulane Rd. and Cocklebur at Rainbow anode systems; all had CP readings that did not meet the Operators established CP criteria for over one year. The Operator provided no evidence that they had taken any actions to correct the identified deficiencies.

PROBABLE VIOLATION: The Atlanta Gas Light Company - Atlanta Service Center failed to follow the procedures required by §192.465(d) and their OPM procedures to take steps to bring deficient readings up to the minimum level required by their CP criteria.

b. 49CFR §192.455 - External corrosion control: Buried or submerged pipelines installed after July 31, 1971.
   (a) Except as provided in paragraphs (b), (c), (f) and (g) of this section, each buried or submerged pipeline installed after July 31, 1971, must be protected against external corrosion, including the following:
      (2) It must have a cathodic protection system designed to protect the pipeline in accordance with this subpart, installed and placed in operation within 1 year after completion of construction.

COMMENTS: In Division III, Section 7, Page 4 Item 7.2.2, of the Operators OPM it states: b. For distribution pipelines, it must have a cathodic protection system designed to protect the pipeline in accordance with this Section, installed and placed in operation within 1 year after completion of construction. For all new steel transmission pipelines (buried or submerged), cathodic protection shall be installed and placed in service within 6 months after construction. However, it is preferred that cathodic protection for all steel piping be installed in less than three (3) months after completion of construction."

During this inspection Staff found 5 isolated steel services at The Fulton Mill Lofts located at 170 Boulevard (4 services), installed December 17, 1997 and the Hickory Ridge Landfill service line at Coca Cola Syrup Plant on Browns Mill Rd. installed February 10, 2012., that the corrosion department was not aware of and did not have cathodic protection applied.

PROBABLE VIOLATION: The Atlanta Gas Light Company Atlanta-GA Service Center failed to follow the procedures required by §192.455 and their OPM procedures to take steps to bring readings to meet cp criteria as required.

c. 49CFR, §192.479 - Atmospheric corrosion control; General.
   (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

STAFFS COMMENTS: In Division II, Section 8, Item 8.22, of the Operators OPM it states Each pipeline or portion of pipeline that is exposed to the atmosphere must be cleaned and applied with a coating suitable for the prevention of atmospheric corrosion. Coatings shall be in accordance with Division III, Section "7.5 Protective Coating Requirements" on page 9. Remedial action shall be taken whenever necessary to maintain protection against atmospheric corrosion.

During this inspection Staff performed field audits of the Operator's pipeline facilities and found that they failed to clean and coat their facilities that are exposed to the atmosphere at the 3791 Browns Bridge Rd. (Coca Cola Syrup Plant) meter set, and at three (3) Meter bank locations at The Stacks at 170 Boulevard. Staff notes that in the areas where the meter banks are installed they observed approximately 52 meters installed on one meter bar. When Staff requested atmospheric corrosion inspection records they observed that inspection had been documented, however the dates were for individual meter sets and not the entire aboveground facility. However, while some meter sets on the header had been cleaned and coated, Staff observed that there was atmospheric corrosion present on other meter sets that had not been addressed.

PROBABLE VIOLATION: The Atlanta Gas Light Company Atlanta Service Center failed to clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, as required by §192.479(a) and their OPM procedures.

d. 49CFR §192.481 - Atmospheric corrosion control: Monitoring.
(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

If the pipeline is located:	Then the frequency of inspection is:
Onshore:	At least once every 3 calendar years, but with intervals not exceeding 39 months.

STAFFS COMMENTS: In Division II, Section 8, Item 8.22, of the Operators OPM it states: " All aboveground facilities that transport gas, including pipe, valves, compressor units, metering stations, regulator and odorizer stations, storage tanks, holders, and fabricated assemblies, shall be inspected for evidence of active corrosion at least once every 3 calendar years, but with intervals not exceeding 39 months.

Staff conducted random field inspections for atmospheric corrosion and found four (4) isolated services located at 170 Boulevard in the Fulton Cotton Mill Lofts. The Operator produced records for the inspection of the meters that are located inside the facility, however the documentation reviewed by Staff did not address the above ground portion of the service line which was on the other side of the building wall and which was found to have atmospheric corrosion.

PROBABLE VIOLATION: The Atlanta Gas Light Company Atlanta Service Center failed to inspect portions of pipeline exposed to the atmosphere as required under 49CFR §192.481(a) and their OPM procedure.

e. 49CFR §192.625 Odorization of gas
(f) To assure the proper concentration of odorant in accordance with this section, each operator must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.

COMMENTS: In Division II, Section 15, Page 5 of the Operators OPM it states: "For odorant testing of landfill gas that may contain H2S, an odorant detection instrument that has been Company-

approved for this application will be used for sampling odorant concentrations. As indicated above for natural gas, odorant checks on landfill gas will be performed at 3-month intervals."

During this inspection Staff requested documentation for the Operators odorant sampling program. The Operator advised Staff that the Atlanta Gas Light Company Atlanta Service Center has not tested for odorant in the landfill gas line that feeds the Coca Cola Syrup plant on Browns Mill Rd. since 2018.

PROBABLE VIOLATION: Atlanta Gas Light Company – Atlanta Service Center failed to conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable in the landfill gas line that feeds the Coca Cola Syrup plant on Browns Mill Rd. since 2018, as required by §192.625(f) and their OPM procedure.

f. 49CFR §192.707; Line Markers for mains and transmission lines
(a) Buried Pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:
(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference.

COMMENTS: The Operator's Operations Procedure Manual states in Division III, section 10: Pipeline Markers under 10.1 Pipeline Markers Buried Transmission Lines that; A standard pipeline marker (See Division III, Section "10.4 Pipeline Marker Installation" on the next page below) Shall be placed and maintained as close as practical over each buried transmission line at each crossing of a public road and railroad, and wherever necessary to identify the location of the transmission line to reduce the possibility of damage or interference. A rule of thumb is to place markers at such intervals that when standing at one marker another marker can be seen in each direction of the run of the pipeline. Consideration should also be given to installing markers at bends or angles changing the direction of the horizontal run of the pipe.

During this inspection Staff identified an area in the Scott Boulevard to Buford Hwy right of way where a 24-inch transmission line goes under a creek in a residential back yard at 2237 Creek Park Rd. that has no pipeline markers at the creek where the transmission line goes under. The closest sign to the creek is on the edge of the property in the front yard where the line runs under Creek Park Rd. from here there is not another visible sign at the creek crossing or in the direction of the run of the pipeline to the back of the property along the right of way.

PROBABLE VIOLATION: Atlanta Gas Light Company – Atlanta Service Center failed to place and maintain pipeline markers over their transmission lines as required by §192.707(a)(2) and their OPM procedures.

g. 49CFR §192.614 – Damage prevention program.
(c) The damage prevention program required by paragraph (a) of this section must, at a minimum:
(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.

COMMENTS: Operator's procedures in Division II, Section 3.3.1(B), of their Operations and Procedural Manual (Regular Locate Requests) which states: "Within forty-eight (48) hours (beginning at 7:00 A.M.) the next business day after the locate request has been received excluding Saturdays, Sundays, or holidays), Atlanta Gas Light or its contractor shall locate any underground

facilities in the area described on the locate ticket, or notify the excavator that there no underground facilities in the area.

Staff determined that the Atlanta Gas Light Company Atlanta service center failed to identify and mark their facilities as required by their Operations and Procedural Manual on numerous locate requests that were due. An example is ticket number 211222-002516 with a legal date to dig on 12/29/2021 and was answered to 3N: Unmarked: Late on 12/28/2021. Another example is ticket number 220112-003736 with a legal date to dig on 1/18/2022 and was answered to 3N: Unmarked: Late.

PROBABLE VIOLATION: Atlanta Gas Light Company - Atlanta service center failed to follow their procedures required under §192.605(a) and their Operations and Procedural Manual for conducting their damage prevention program required under §192.614(c).

h. 49CFR, §192.469 External corrosion control: Test stations.
Each pipeline under cathodic protection required by this subpart must have sufficient test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection.

COMMENTS: The Operator's Operations Procedure Manual states in Division III Section 7 Page 50 on Table 7.12.4-1 "Corrosion Leak Anode Installation Criteria Summary Table" requires a test station and anode are required to be installed on a galvanic system when a corrosion leak is found. An example of this is on 1111 Clairemont Ave. Decatur. WR# 2580209 where a corrosion leak was found on the main and no record of an anode or test station installation could be found.

PROBABLE VIOLATION: Atlanta Gas Light Company Atlanta service center failed to follow their procedures required under §192.605(a) and their Operations and Procedural Manual for installing test wires in anodes systems when a corrosion leak is found.

i. §192.147 Flanges and flange accessories.
(a) Each flange or flange accessory (other than cast iron) must meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP-44 (incorporated by reference, see §192.7), or the equivalent.

AGL's OPM - Div. III Section 4.8.4 #B 'Bolting' states "For all flanged joints the machine bolts or stud bolts used should extend completely through the nuts."

COMMENTS: During field review of the Operator's facilities, Staff observed regulator stations with flanged joints that the bolts did not extend through the nuts. One station where this was particularly noted was located at Oxford Village Townhomes. Staff also noted this issue on the meter set at 3791 Browns Mill Road (Coca Cola Syrup plant).

PROBABLE VIOLATION: The Operator failed follow their procedure to ensure that for all flanged joints the machine bolts or stud bolts used should extend completely through the nuts as required by their OPM procedure.

2. 49CFR §192.181 - Distribution line valves.
(b) Each regulator station controlling the flow or pressure of gas in a distribution system must have a valve installed on the inlet piping at a distance from the regulator station sufficient to permit the operation of the valve during an emergency that might preclude access to the station.

COMMENTS: During field review of the Operator's facilities, Staff observed regulator stations that did not have inlet valves at a reasonable distance from the station sufficient to permit the operation of the valve during an emergency that might preclude access to the station. The regulator stations observed with this are:

a) 808 Park North Blvd - no inlet valve located during the field review.
b) Master-meter - Wildwood Park Townhomes (405 Fairburn Rd) - the inlet valve is not in a box or enclosure, and was not located during the field review.
c) Master-meter - Bent Creek Colony apartments (2085 Bent Creek Way SW) - the inlet valve is not in a box or enclosure, and was not located during the field review.

PROBABLE VIOLATION: The Operator failed to have a valve installed on the inlet piping at a distance from their regulator station(s) sufficient to permit the operation of the valve during an emergency.

3. 49CFR, §192.615(c) – 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.

STAFFS COMMENTS: During this inspection Staff found that the Operator has not included all public officials that may be needed in a pipeline emergency. Some of these in their service area are Kinder Morgan, Plantation pipeline, and Colonial pipeline as well as Comcast and Google fiber Also, Operators records and personnel indicated that emergencies involving natural disasters is not being covered during liaison meetings with their fire, police and current public officials.

PROBABLE VIOLATION: Operator has failed to provide the required liaison as required under 49CFR, §192.615(c).

ITEMS OF CONCERN

1. 49 CFR, §192.615 - Emergency plans.
   (b) Each Operator shall:
   (3) Review employees activities to determine whether the procedures were effectively followed in each emergency

STAFFS CONCERN: During this inspection Staff found no evidence that the Operator had reviewed their emergency responses caused by 3rd party damage to ensure that squeezing off was a more prompt and effective response than turning emergency valves to shut off the flow of gas. Staff interviewed Operators personnel in charge of emergency response and asked if they knew approximately how long it would take to shut off any one of their designed emergency valve districts. Operator personnel stated they had no idea. Operator should evaluate their emergency valve districts for time required to shut off gas using emergency valves before an emergency occurs so that they know which course of action will be the most effective in providing a prompt and effective response. Also, Staff reviewed the Operators

emergency plan which has some emergency shut off districts that have over 7,500 customers in them with upwards to 15 valves that would have to use in order to shut off the flow of gas.

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:
      (2) Establishing and maintaining adequate means of communication with appropriate fire, police and other public officials.

   STAFFS CONCERN: Staff could not find the Operators process for maintaining communication in the event of a natural disaster in their emergency plan. Staff was later provided a separate document from Operators personnel of a backup communication plan and was told they will add it to their service center emergency plan for maintaining communication during natural disasters.

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, Atlanta Gas Light Company 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 violation 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
1(e)	§192.625(f)	Odorization	$15,000.00
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: ATLANTA GAS LIGHT COMPANY

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37024

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	$_____ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ 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:	)	
	)	
Violation(s) Report with Proposed Civil Penalty and Letter of Concern Atlanta Gas Light Company-Atlanta Inspection JH22-001 on January 10, 2022	)	**DOCKET NO. 37024**

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 *Atlanta Gas Light Company* 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

* Pedro Cherry, President and CEO
Southern Company Gas
Ten Peachtree Place, NE,
Atlanta, GA 30309
ppcherry@southernco.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