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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# 192921

Docket No. 37024

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

REF: Comprehensive Inspection # JH22-007

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Pedro Cherry

On February 28, 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 JH22-007 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

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JH22-007

OPERATOR: AGL - Gwinnett

INVESTIGATOR: Jack Hewitt

INSPECTION DATE: February 28, 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
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT15-029	6/25/2015

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...	JH22-007	2/28/2022
192.615(c)	Each operator shall establish and maintain liaison with appropriate fire, police, and other...	JH22-007	2/28/2022

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

AGLC GWINNETT SERVICE CENTER/ COMPREHENSIVE INSPECTION
INSPECTION NUMBER JH22-007 / DOCKET NUMBER 37024

On February 10, 2022 Staff provided questions to AGLC-Gwinnett regarding the upcoming comprehensive inspection. During the periods of February 28-March 3, 2022. Staff reviewed AGLC Gwinnett / Hall County Service Center Operator's manuals, records, and field operations. Staff reported to AGLC-Gwinnett Service Center on various dates between March 7, 2022 and March 17, 2022 to conduct the field inspection of AGLC Gwinnett / Hall County facilities.

During this inspection the Operator was represented by:
Rick Slagle - Director of Compliance and Quality Assurance
Ralph McCollum - Lead Compliance Engineer
Mike Hearn - Region Director
Ken Born– Operations Supervisor
Melody Morrow – Manager Construction Ops.
Nick Kitzmiller - Supervisor Corrosion

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

At the time of this inspection Atlanta Gas Light Company Gwinnett Service Center was under one previously existing probable violation. The FPU Supervisor advised that he is addressing this item with the Operator

As a result of this inspection Staff noted the following probable violations of the minimum federal safety standards.

NOTICE OF PROBABLE VIOLATION

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.

   a. 49CFR, §192.353 Customer meters and regulators: Location.
      (a) Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated. However, the upstream regulator in a series may be buried.

      STAFFS COMMENTS: In Division II section 13.4 'General Maintenance of Meter and Regulator Installations' under #c 'Atmospheric corrosion (risers, meter sets & regulator stations)' states: "When approaching aboveground facilities, Field Service Representatives should perform a visual inspection of the area for signs of conditions that may contribute to atmospheric corrosion."

COMMENTS: During this inspection Staff encountered a meter set on Belmont Hwy (at mailbox #4041) that appeared to have no sort of separation between the bottom of the meter on the soil (the meter set is located near the Belmont Hwy & Talmo Rd emergency valve).

PROBABLE VIOLATION: The Operator failed to follow their procedures by visually inspecting aboveground facilities for signs of conditions that could contribute to atmospheric corrosion.

b. 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 8.1.3 of the Operator OPM it states: "Prompt action shall be taken to correct any deficiencies indicated by these monitoring and inspection procedures."

Staff reviewed annual corrosion record readings and found test points in the Buford Hwy Rectifier System (9/27/2019-9/10/2021) Stonecypher Rd System (3/31/2017-7/17/2018) Suwannee Creek Rectifier (3/31/2017 - 7/26/2018) and Britt Rd. (6/20/2019 - 4/28/2021) Rectifier Systems that 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 – Gwinnett / Hall Co. 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.

c. 49CFR, §192.465 External corrosion control: Monitoring.
(a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.

COMMENTS: In Division II Section 8, Item 8.2, of the Operator's OPM it states: "Each piping system or other gas facility that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine if the cathodic protection meets established criteria for protection as defined in this section. However, separately protected steel service risers on plastic services, protected service lines which are insulated from the main, and short isolated sections of the mains not over 100 feet in length, shall be surveyed each year, with a different ten percent checked each year so that all are tested within a ten-year period."

During this inspection (JH22-007) the records provided by the Operator indicated that isolated services were scheduled to be checked during August 2021, however no readings were taken at 3264 Brookshire Way, 3221 Bunten Rd., 6395 Spalding Dr., 231, 232, 241, & 251 Cathy Lane.

PROBABLE VIOLATION: The Operator failed to monitor cathodically protected isolated services as required by their O & M procedure.

d. 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.

COMMENTS: The Operator's OPM Div. II Section 8 'Atmospheric Corrosion Control' 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. Minor oxidation that occurs on most metal surfaces exposed to the atmosphere is not considered to be the type of corrosion that requires remedial action. However, it is considered good practice to recoat aboveground facilities before the coating has deteriorated to the extent that extensive cleaning or other surface preparation is required."

The Operator's OPM Div. II Section 8.22 also states:

> "Remedial action shall be taken whenever necessary to maintain protection against atmospheric corrosion. Light surface oxidation or minor atmospheric corrosion that does not affect the safe operation of the pipeline before the next scheduled inspection does not require remedial action. However, it is considered good practice to recoat aboveground facilities before the coating further deteriorates and more extensive remediation is required.
>
> If atmospheric corrosion is found, remedial measures must be taken to the extent required by Division II, Section "8.24 Corrosion Remedial Measures" on page 91, and the facility exposed to atmospheric corrosion cleaned and either coated or jacketed with an approved material suitable for the prevention of atmospheric corrosion as indicated above. Inspection and maintenance information should be recorded as appropriate."

During field inspection, Staff discovered atmospheric corrosion on the meter set at 2100 Pleasant Hill Rd., The Operator provided records that indicated that these aboveground facilities had been inspected on March 30, 2020 and April 7, 2021 however no noted issues were observed;

Staff also observed that the header bar for the meter set at 3455 Peachtree Industrial Blvd had atmospheric corrosion. Records provided by the Operator indicated that this meter set had been inspected on October 9, 2020 and February 3, 2021, and another record indicated that this meter set had been brushed and painted on October 9, 2020. However, the meter bar had not been cleaned and painted and was found to have atmospheric corrosion.

Staff also found that the commercial meter set at 2800 Mechanicsville Rd. had atmospheric corrosion, but the Operator could not produce a record where this meter was inspected for atmospheric corrosion.

PROBABLE VIOLATION: The Operator failed to clean and coat the pipeline at numerous meter sets as required under 192.479(a) and as required in their O & M Procedure.

e. CODE REQUIREMENT §192.721 - Distribution systems: Patrolling.
(a) The frequency of patrolling mains must be determined by the severity of the conditions which could cause failure or leakage, and the consequent hazards to public safety.

COMMENTS: The Operator's OPM Div. II, Section 2.6 'Patrolling Records' states:

"A record shall be made of the time of each patrol or inspection identifying the portion of pipeline or distribution system covered and the conditions found. If maintenance or repair is necessary, the work performed and the date of completion shall be made part of the patrol record. See Division II, Section "Section 21: Record Keeping" on page 1 for retention of records."

The Operator's OPM Div. III, Section 10.2 'Buried Mains' states:

"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 main at each crossing of a public road and railroad in Class 1 and 2 locations, or wherever necessary to identify the location of the main to reduce the possibility of damage or interference. Company personnel will complete investigations of markers along public rights-of way in rural areas (Class 1 and 2 locations) during regular patrolling exercises on an annual basis, with inspection intervals not to exceed 15 months. The inspection of pipeline markers should be tracked as appropriate in the Compliance Tracking System. A detailed procedure for this process is provided in Division III, Section 10.6."

During field inspections of the Operator's Class 1 and Class 2 locations, markers were found to be in good condition. The Operator stated that they maintained their Class 1 and Class 2 patrolling areas through AGL continuing surveillance program; however, the Operator currently has no records being completed or retained as required by their OPM which requires the Operator to do annual inspections and retain documentation of the inspections performed.

PROBABLE VIOLATION: The Operator failed to follow their procedures by not documenting their patrols in Class 1 and Class 2 areas.

f. 49CFR §192.469 External corrosion control: Test stations.
Each pipeline under cathodic protection required by this subpart must have sufficient test stations 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" states that a test station and anode are required to be installed on a galvanic system when a corrosion leak is found."

During this inspection Staff found that the Operator had documented a corrosion leak on the main 599 Goshen Springs (WR# 2197729) and there was no record of an anode or test station being installed as required.

PROBABLE VIOLATION: The Operator failed to follow their procedures required under §192.605(a) and their Operations and Procedural Manual for installing a test station and anode when a corrosion leak is found.

f. 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

COMMENTS: The Operator's Operations Procedure Manual in Division II Section 2 states

> "Observe surface conditions on and adjacent to the gas pipelines for: Atmospheric corrosion or physical deterioration of exposed piping, pipeline spans, and pipe supports such as on bridge crossings, pilings, headwalls, casing, and foundations." And the procedures also state: "Take appropriate actions or schedule work for any abnormal conditions found using the Company's Work Management System (WMS). Locations or areas that are found to be potentially hazardous during patrolling may be patrolled more frequently based on the probable severity, timing, and duration of the hazard."

PROBABLE VIOLATION: Operator provided records indicating exposed pipe was found during patrols, however no records were provided to show appropriate action was taken as required by 192.705(a) and their procedures.

g. 49CFR, §192.615 - Emergency plans.
(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
(6) Taking necessary actions, including but not limited to, emergency shutdown, valve shut-off, or pressure reduction, in any section of the operator's pipeline system, to minimize hazards of released gas to life, property, or the environment.

COMMENTS: During this inspection Staff did not find in the Operators emergency plan any transmission valves listed for shutting down sections of their system necessary to minimize hazards to life or property.

PROBABLE VIOLATION: The Operator failed to establish an emergency shutdown and pressure reduction procedure for any section of their transmission pipeline system necessary to minimize hazards to life or property.

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

COMMENTS: 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 192.615(c).

ITEMS OF CONCERN

1. 49 CFR, Part §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 the appropriate public safety answering point (i.e., 9-1-1 emergency call center), where direct access to a 9-1-1 emergency call center is available from the location of the pipeline, and fire, police, and other public officials. Operators may establish liaison with the appropriate local emergency coordinating agencies, such as 9- 1-1 emergency call centers or county emergency managers, in lieu of communicating individually with each fire, police, or other public entity. An operator must determine the responsibilities, resources, jurisdictional area(s), and emergency contact telephone number(s) for both local and out-of-area calls of each Federal, State, and local government organization that may respond to a pipeline emergency, and inform such officials about the operator's ability to respond to a pipeline emergency and the means of communication during emergencies.

   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.

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 Report and Letter of Concern	)	**DOCKET NO. 37024**
Atlanta Gas Light Company-Gwinnett	)	
Inspection JH22-007 on February 28, 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 *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