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Georgia Public Service Commission

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Atlanta, GA 30334-5701

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psc.ga.gov

DOCKET# 37078
DOCUMENT# 216303

Docket No. 37078

City of Richland Gas Department
390 Broad Street P. O. Box 126
Richland, GA 31825

REF: Follow Up Inspection # DL23-014

☒ Certified Mail ☐ Regular Mail ☐ Email

Attention: Mr. Kenneth Josey

On May 11, 2023, 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 DL23-014 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. 37078 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: DL23-014

OPERATOR: City of Richland Gas Department

INVESTIGATOR: David Lewis

INSPECTION DATE: May 11, 2023 REPORT MAILED DATE: November 6, 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 Operators previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
515-9-3-.08	Written Formal Notice of Violation	JL16-022	3/14/2016
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	DL19-011	2/12/2019
192.603(c)	General - The Associate Administrator or the State Agency that has submitted a current...	AT22-046	8/31/2022
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	KR23-010	3/6/2023
192.747(a)	Each valve, the use of which may be necessary for the safe operation of a distribution system, m...	KR23-010	3/6/2023
192.723(a)	Each operator of a distribution system shall conduct periodic leakage surveys in accordance with...	KR23-010	3/6/2023
192.605(b)(8)	Periodically reviewing the work done by operator personnel to determine the effectiveness and...	KR23-010	3/6/2023
192.615(b)(3)	Review employee activities to determine whether the procedures were effectively followed in each...	KR23-010	3/6/2023
192.707(d)(2)	Line markers for mains and transmission lines. Marker warning. The following must be written...	KR23-010	3/6/2023
192.625(f)	To assure the proper concentration of odorant in accordance with this section, each operator must...	KR23-010	3/6/2023
192.625(a)	A combustible gas in a distribution line must contain a natural odorant or be odorized so that at...	KR23-010	3/6/2023
192.1007(b)	Identify threats. The operator must consider the following categories of threats to each gas...	DL23-015	5/3/2023

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF RICHLAND/ FOLLOW-UP INSPECTION
INSPECTION NUMBER DL23-014 / DOCKET NUMBER 37078

On May 16, 2023, Staff reported to City of Richland to perform a follow-up inspection of the Operator's previously existing probable violations.

During this inspection the Operator was represented by:
Corui Josey Public Works Supervisor
Kenneth Josey - Mayor
Wanda Wilson - City of Richland (City Clerk)
Bobby Boyd – City Services (Consultant)

Commission Staff was represented by David Lewis, Lead Inspector.

At the time of this inspection the City of Richland was under two previously existing probable violations and had one (1) Consent Agreement Pending for penalties associated with some previously cleared violations. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATIONS CONTINUING

1) In regard to the probable violation of Commission Rule 515-9-3-.08 which was cited in Inspection Number JL16-022; in that inspection Staff stated that: The Operator failed to submit a written response to two (2) inspection reports (LB13-034 and DJ14-044) in accordance with Commission Rule 515-9-3-.08.

   Staff proposed a Civil Penalty of $5,000.00 for this probable violation.

   Note: the consent agreement which was cited under Inspection Number DL19-011 was actually the same violation. See 2nd follow up noted below.

   OPERATOR FIRST RESPONSE: In their response letter to Inspection Number JL16-022, dated September 19, 2016, the City of Richland failed to specifically address this violation, however they stated that: "The City of Richland respectfully request the recommended civil penalties be mitigated in favor of remedial action to correct any deficiencies found during the GPSC inspection.

   OPERATOR SECOND RESPONSE: In their second response letter to Inspection Number JL16-022, dated October 21, 2016 the Operator stated: "The City of Richland respectfully requests an informal conference with the Director and/or her staff to discuss the Notice of Probable Violation and the proposed $5,000 civil penalty as referenced in Docket No. 37078, Inspection No. JL16-022. The City of Richland respectfully requests consideration that the proposed $5,000 in civil penalties be allowed to be used for continuing gas system improvements and equipment purchases."

   FIRST FOLLOW-UP INSPECTION: On September 12-13, 2016 Staff reported to the City of Richland to conduct a follow-up inspection of the Operators previously existing probable violations. (Ref: Inspection Number LB16-048) In that inspection Staff stated: "In Inspection Number JL16-022 Staff recommended two (2) proposed civil penalties for the Operator failure to respond to Inspection Number LB13-034 ($2,500) and Inspection Number DJ14-044 ($2,500). During this inspection Staff found that the Operator had not responded to Inspection Report JL16-022; however, the 30 day response time frame for the report had not elapsed. Because the Operator has failed to respond to the Inspection Reports associated with their existing probable violations (Inspection Report Numbers LB11-017; JL13-024; LB14-034; DJ14-044; JL16-021; JL16-022) Staff elected not to review these items."

   Staff also issued a Warning Letter for Commission Rule 515-9-3-.08 and stated: "At the time of this inspection Staff found that the Operator had received Inspection Number JL16-022, however, they had

taken no action to address the findings in that report. Staff advised the Operator that they were concerned with the fact that they have taken no action to address the findings from Inspection Number JL16-022, and to even respond to the Commission as directed in the "Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director which was attached to the inspection report. Staff also advised the Operator that failing to respond to a written formal notice of violation from the Commission is a violation of the Commission's rules, and could subject the Operator to civil penalties under O.C.G.A. 46-2-91."

OPERATOR RESPONSE: In their response letter to Inspection Number LB16-048, dated December 20, 2016 the Operator stated: "Please find attached copies of the U.S. Postal Service Certified Mail Return Receipt for GPSC Response JL16-022."

INFORMAL CONFERENCE: On January 17, 2017 Staff met with representatives from the City of Richland to conduct an informal conference regarding the civil penalty assessed for violations of 49 CFR, Part 192 in report number LB16-048. (Ref. Inspection Number LB17-002). In this report Staff stated: "During this conference Staff and Richland discussed possible measures to mitigate the civil penalty, which included Cathodic Protection issues, replacement of bare services, and various training options. At completion of the meeting, Staff instructed Richland to submit a follow-up email concerning the status of the various outstanding violations. Richland emailed this information on February 1, 2017. Staff sent a follow-up email requesting an update on March 22, 2017. Once Staff receives an update, as well as the response to this inspection report, a follow-up inspection will be scheduled."

OPERATOR RESPONSE TO INFORMAL CONFERENCE: On May 1, 2017 the City of Richland responded and stated: "The City of Richland has met with Georgia Public Service Commission to address the referred to violations. The City has worked diligently to address all the violations and begin to clear them from our reports. We would like to schedule a new meeting with Lynn and Daphne to be sure we have addressed the issues as Georgia Public Service Commission. We appreciate the patience and the requests to correct our violations in a timely manner."

SECOND FOLLOW-UP INSPECTION: On January 17, 2017, Staff conducted a follow-up inspection of the Operators previously existing probable violations. (Ref: Inspection Number DJ17-001) In that inspection, Staff stated: "Staff reviewed the probable violation with the Operator and determined that the Operator has not responded to inspection LB16-049, dated 11/15/2016."

Staff proposed a civil penalty of $2,500 for the Operators failure to respond to this inspection report.

OPERATOR RESPONSE: In their response letter to Inspection Number DJ17-001, dated July 24, 2017, the City of Richland stated: "The City of Richland does not contest the probable violations, but the City does wish to mitigate the civil penalty of $2,500. The City of Richland wishes to continue to put money back into its gas system. The City wishes to allocate these funds to system upgrades such as training, inserts, and cathodic protection remediation, and leak detection equipment.

THIRD FOLLOW-UP INSPECTION: On February 12, 2019, Staff conducted a follow-up inspection of the Operators previously existing probable violations. (Ref: Inspection Number DL19-011) In that inspection, Staff stated: "During this inspection (Inspection Number DL19-009) Staff determined that the Operator has not taken action to address the outstanding civil penalties, therefore they cannot clear this violation. If the Operator still desires mitigation of the proposed civil penalty for this item, they must submit a plan for mitigation to the Director."

OPERATOR RESPONSE: Staff found no response letter from the Operator for this inspection.

FOURTH FOLLOW-UP INSPECTION: On February 18-19th 2019, Staff conducted a follow-up inspection of the Operators previously existing probable violations. (Ref: Inspection Number DL19-009) In that inspection, Staff stated: "During this inspection (DL19-009) Staff determined that the Operator has not taken action to address the outstanding civil penalties, therefore they cannot clear this violation. If the Operator still desires mitigation of the proposed civil penalty for this item, they must submit a plan for mitigation to the Director.

OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number DL19-009.

FIFTH FOLLOW-UP INSPECTION: On February 18 and 19, 2019 Staff met with representatives from the City of Richland to conduct an inspection of the Operators anti-drug and alcohol programs required by 49CFR Parts 40 and 199. (Ref. Inspection Number JJ19-012) In that inspection Staff stated: "At the time of this inspection, the City of Richland was under Ten (10) previously existing probable violations. These violations will be addressed under Follow-Up Inspection Number DL 19-009."

OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ19-012.

SIXTH FOLLOW-UP INSPECTION: From November 2, thru 3, 2020 Staff reported to the City of Richland to perform an inspection on the City of Richland's Gas Department Operators Qualification (OQ) program for compliance with the minimum federal standards in 49CFR §192, Subpart N. (Ref. Inspection Number JJ20-047) In that inspection Staff stated: "At the time of this inspection the City of Richland was under one previously existing probable violation(s). This violation has been addressed under Follow-Up Inspection Number (DL19-009)."

OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JJ19-012.

SEVENTH FOLLOW-UP INSPECTION: From November 3, thru 4, 2020 Staff reported to the City of Richland to perform an inspection on the City of Richland's Gas Department Distribution Integrity Management (DIMP) program for compliance with the minimum federal standards in 49CFR §192, Subpart P. (Ref. Inspection Number JH20-038) In that inspection Staff stated: "At the time of this inspection the City of Richland was under one previously existing probable violation(s). This violation has been addressed under Follow-Up Inspection Number (DL19-009)."

OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number JH20-038.

EIGTH FOLLOW-UP INSPECTION: On March 8th, 2021 Staff reported to the City of Richland to perform an inspection on the City of Richland's Gas Department Public Awareness Program for compliance with the minimum federal standards in 49CFR §192. (Ref. Inspection Number KR21-008) In that inspection Staff stated: "At the time of this inspection the City of Richland was under one previously existing probable violation(s). This violation has been addressed under Follow-Up Inspection Number (DL19-009)."

OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number KR21-008.

NINTH FOLLOW-UP INSPECTION: On May 10-11th 2021, Staff conducted a follow-up inspection of the Operators previously existing probable violations. (Ref. Inspection Number KR21-015) In that

inspection Staff stated: "On May 10-11th 2021, Staff conducted a follow-up inspection of the Operators previously existing probable violations. During this inspection, numbered KR21-015 staff reviewed emails containing invoices that show the city of Richland has allocated funds to their CP system over the last several years. However staff also noticed that the City of Richland has failed to respond to the follow-up inspection from 2019 numbered DL19-009. In that inspection staff stated: "If the Operator still desires mitigation of the proposed civil penalty for this item, they must submit a plan for mitigation to the Director." At the time of this inspection (KR21-015) the Director has yet received a written plan submitted by the City of Richland as to how they wish to mitigate these proposed civil penalties.

OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number KR21-015.

TENTH FOLLOW-UP INSPECTION: On August 31, 2022, Staff reported to the City of Richland Gas System to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number AT22-046) In that inspection Staff stated: "At the time of this inspection the City of Richland had one existing probable violation and a stipulation agreement. Because this inspection was specifically to address the operator's methane emission reduction plan Staff did not review these items.

OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number AT22-046.

ELEVENTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number DL23-014) Staff found that the Director has not yet received a written plan submitted by the City of Richland as to how they wish to mitigate these proposed civil penalties, as was previously noted in Inspection Number KR21-015. In addition, since Staff last proposed a civil penalty for failing to submit a written response in accordance with Commission Rule 515-9-3-.08 the City of Richland has failed to respond to eight of the nine inspection reports they have received. Staff discussed options to negotiate the assessed penalties with the Mayor of Richland. The Mayor stated that he would be sending a request for an informal conference with the Director of Pipeline Safety.

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

2) In regard to the probable violation of §192.603(c) which was cited under Inspection Number AT22-046, In that inspection, Staff stated: "Pursuant to section 60108(a)(2) and §192.603(c), our review of your inspection and maintenance procedures indicates the procedures are deficient. Specifically, we have identified the following item which need amendment:

1. Inspection Question #8. Leaks & Releases - Leak Data Collection and Analysis
   Do procedures include a methodology to collect, retain and analyze detailed information from detected natural gas leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?

   OBSERVED DEFICIENCY: The Operator's instructions for data collection are very vague and do not provide sufficient guidance for their personnel.

   REQUIRED AMENDMENT: The Operator must amend their procedures to include a methodology to collect, retain and analyze detailed information from detected natural gas leaks,

including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting.

2. Inspection Question #9. Leaks & Releases - Detecting Leaks
Do procedures include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way?

OBSERVED DEFICIENCY: The Operators plan refers the reader to their O&M Procedures. The procedures do not identify the areas requiring patrolling, and do not provide guidance for any additional walk arounds or more frequent inspection of stations. The procedures also do not provide guidance on how stations are to be inspected for leaks.

REQUIRED AMENDMENT: The Operator must amend their procedures to include instructions for personnel to detect leaks to help further reduce emission in stations and along the right of way.

3. Inspection Question #10. Leak Mitigation & Repair
Do procedures define a process to identify, classify, mitigate and repair leaks?

OBSERVED DEFICIENCY: Operator leaks are classified, and identified by the Commission rules. Operator needs to add their plan for analysis and repair of all leaks, not just hazardous leaks.

REQUIRED ADMENDMENT: The Operator must amend their procedures to define a process to identify, classify, mitigate and repair all leaks, not just hazardous leaks.

4. Inspection Question #13. Regulator Stations – Configuration
Do maintenance or operational procedures contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators?

OBSERVED DEFICIENCY: This item is not addressed in the Operators plan.

REQUIRED AMENDMENT: The Operator must amend their procedures to contain measures for identifying potential configuration changes that would reduce natural gas releases from regulators.

5. Inspection Question #18. Leak-Prone: Leaks & Releases - Leak Data Collection and Analysis
Do procedures include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening or otherwise below thresholds for regulatory reporting?

OBSERVED DEFICIENCY: The Operator's instructions for data collection are very vague and do not provide sufficient guidance for their personnel.

REQUIRED AMENDMENT: The Operator must amend their procedures to include a methodology to collect, retain and analyze detailed information from detected leaks, including those eliminated by lubrication, adjustment, tightening.

6. Inspection Question #20. Leak-Prone: Leak Mitigation & Repair - Replacement and Remediation (Other Materials).
Do procedures clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114?

OBSERVED DEFICIENCY: This item is not addressed in the Operators plan.

REQUIRED AMENDMENT: The Operator must amend their procedures to clearly define a process to address replacement or remediation of pipe segments with known leak issues beyond those specifically identified in Section 114."

OPERATOR RESPONSE: Staff found no response letter from the Operator for Inspection Number AT22-046.

Staff determined that this probable violation cannot be cleared at this time.

NOTES FROM SUPERVISOR REVIEW: Since receiving a violation and proposed civil penalty for failing to respond to Inspection Number LB16-049, the City of Richland has subsequently failed to respond to eight (8) of the nine (9) inspection reports from the Commission. (Inspection Numbers DL19-009, DL19-011, JJ19-012, JJ20-047, JH20-038, KR21-008, KR21-015, and AT22-046) The City of Richland is warned that if they fail to provide a response to this inspection Staff may pursue additional enforcement actions.

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 Richland

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37078

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 Probable Violation Report	)	**DOCKET NO. 37078**
City of Richland Gas Department	)	
Inspection DL23-014 on May 11, 2023	)	
	)	

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 Richland Gas Department* 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 Josey, Mayor
City of Richland Gas Department
390 Broad Street
P.O. Box 126
Richland, GA 31825
wilsonwandal@bellsouth.net

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

Respectfully Submitted this 9th day of November 2023:

Cathy Nesbitt

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