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Georgia Public Service Commission

(404) 463-6526
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244 Washington Street, SW
Atlanta, GA 30334-5701

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DOCKET# 37040
DOCUMENT# 216309

Docket No. 37040

City of Covington Municipal Gas
P. O. Box 1527
Covington, GA 30015

REF: DIMP (Annual Review) Inspection # JS23-016

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Tres Thomas

On March 2, 2023, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JS23-016 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. 37040 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: JS23-016

OPERATOR: City of Covington Municipal Gas

INVESTIGATOR: Jason Smith

INSPECTION DATE: March 2, 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 review the Operator's Distribution Integrity Management Plan.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.619(a)	No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum...	DJ18-015	5/7/2018

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On March 2, 2023, Pipeline Safety Staff began an annual review of the City of Covington Municipal Gas System's Distribution Integrity Management Plan.

This annual review was performed by Jason Smith, Pipeline Safety Inspector.

At the time of this review Covington Municipal Gas System was under one previously existing probable violation. Staff did not review this probable violation at this time because it will require an onsite visit.

OBSERVED ISSUE

As a result of this review Staff identified deficiencies with the City of Covington's Distribution Integrity Management Plan, specifically:

1. In Section 5.1 'Overview' of Covington's DIMP references the "CLINTON-NEWBERRY NATURAL GAS AUTHORITY".

Staff reviewed SHRIMP plans from other operators and found that this language is also in those plans. Staff recommends Covington Municipal Gas System correct this issue.

2. In Covington's DIMP Plan, Chapter 8, 'Periodic Evaluation and Improvement' it states: "Section 11.5, "PLAN CHANGE LOG" provides a log of the plan changes detailing differences between this Plan (Version 2.4.2) and the previous Plan (Version 2.4.1)."

Staff went to section 11.5 and found it titled 'Threat, Risk Rank, Additional Actions and Performance Measures Organized by Threat-Section'.

These sections followed: 11.5.1 'Overview' and 11.5.2 'Risk Ranking (Consolidated)'
Staff did not see the 'Plan Change Log' referenced in Chapter 8.

Staff also questions a portion of statement in Chapter 8 that states: "detailing differences between this Plan (Version 2.4.2) and the previous Plan (Version 2.4.1)." because Staff did not see Covington Municipal Gas System having a version 2.4.2 or 2.4.1.

Covington's Current Plan Version 5.1 / Program Version 4.0 and Previous Plan Version 4.1.1 / Program Version 2.1.19.

3. In Covington's DIMP Section 7.4. 'Baseline Performance Measure Monitoring' it states "The City of Covington will monitor 10 years of mandatory, and if applicable, Risk Based Performance Measures, as listed in Ch. 7 of this plan. The current 10 years of data will be used to create the baseline. If 10 years of data is not available, data from available years will be used to create the baseline until such time as 10 years of data is available."

Chapter 10 'Record Keeping' states the following records will be maintained for ten years.

"3. Records of data required to be collected to calculate performance measures listed in Chapter 7, MEASURE PERFORMANCE, MONITOR RESULTS AND EVALUATE EFFECTIVENESS,

4. Data Sources referenced during the Threat Assessments (listed in Section 11.3, "LIST OF DATA SOURCES FROM SHRIMP™ INTERVIEWS"),

6. Inspection, maintenance and other records relied upon in developing this written DIMP plan, as listed in the Data Source fields in Section 11.2, "LIST OF ANSWERS AND DATA SOURCES FROM SHRIMP™ INTERVIEWS" of this Plan."

Section 11.2 'List of Answers and Data Sources from SHRIMP™ Interviews' states:

- Under 'Equipment Malfunction Threat' Equipment Malfunction (regulators/relief valves meter sets): How many leak repairs resulting from equipment problems occurred during the years shown? 2017 through 2021 is shown. This is only five years, not 10 as stated in Sectio 7.4.

- Under 'Incorrect Operations Threat' Incorrect Operations (New System – Entire System): How many leak repairs resulting from incorrect operations occurred during the years shown? 2017 through 2021 is shown. This is only five years, not 10 as stated in Sectio 7.4.

- Under 'Excavation Damage Threat' Excavation (New System - Entire System): How many leaks caused by excavation damage were repaired during the years shown? 2017 through 2021 is shown. This is only five years, not 10 as stated in Sectio 7.4.

- How many excavation caused damages not resulting in leaks reported on the PHMSA 7100.1-1 form have occurred during the years shown? 2016 through 2021 is shown. This is only six years, not 10 as stated in Sectio 7.4.

- How many excavation tickets (receipt of information by the underground facility operator from the one-call system) were received during the years shown? 2016 through 2021 is shown This is only five years, not 10 as stated in Sectio 7.4.

Staff observed that in Covington's plan it was not always clear if 10 years of data was reviewed. Some questions include 10 years of data, while others included only five or six years of data.

This concludes Staff's Annual Review of Covington Municipal Gas System's Distribution Integrity Management Program (DIMP). Please contact the Director of Pipeline Safety if you have any questions or concerns at 404-985-4271 or michellet@psc.state.ga.us.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:	)	
	)	
Observed Issue	)	**DOCKET NO. 37040**
City of Covington Municipal Gas	)	
Inspection JS23-016 on March 2, 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 Covington Municipal Gas* 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

*Tres Thomas, Interim City Manager
City of Covington Municipal Gas
P.O. Box 1527
Covington, GA 30015
tthomas@cityofcovington.org

*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