BEFORE THE PUBLIC SAFETY COMMISSION
STATE OF GEORGIA

IN RE:	*	
Application of AGLC for Amended	*	**Docket No. 30707**
Certificate of Public Convenience and	*	
Necessity for Hall County	*	
	*	
IN RE:	*	**Docket No. 29331**
Hall Countywide Safety Plan	*	

CITY OF BUFORD'S OBJECTION TO AGLC'S PETITION FOR EXPEDITED APPROVAL OF AMENDMENT TO HALL COUNTYWIDE SAFETY PLAN

The City of Buford (hereinafter "City" or "Buford") files its Objection to Atlanta Gas Light Company's (hereinafter "AGLC") Petition for Approval to Amend the Hall Countywide Safety Plan and respectfully shows as follows:

The subdivision erroneously identified by AGLC as "Bailey Farms" is, in fact, a subsequent phase of the Reunion development and known as Phase 21. Reunion is a resort style community built by Pulte containing hundreds of homes, golf course, tennis, village and other amenities located in unincorporated Hall County. Buford stands as the exclusive service provider within the Reunion development and serves approximately 830 homes. The existing safety boundary was approved on December 20, 2016.

While AGLC points out that the entrance to this phase of Reunion is within their territory, it is crucial to note that Buford possesses a line that can easily serve the development through an existing easement. Moreover, of the 140 lots in question, 126 are situated within Buford's service territory. Notably, in the "negotiated deal" referenced in AGLC's Petition, AGLC only intended to serve the 14 lots within its service territory.

Granting AGLC's Petition would contradict the long-standing policy of Gas Safety staff advocating for a single service provider within a subdivision.[1]

> In order to eliminate as much confusion as possible for emergency responders, as well as others that are involved with underground utility safety, and to further the goal of increased pipeline safety throughout Georgia, it is our opinion that the territory in question should be assigned to one operator.

A staggering 90% of the lots are already within Buford's service territory and Buford is the sole provider within the Reunion development. Simply stated, Buford has established lines throughout the sprawling development where AGLC presently has none. Alternatively, Buford could serve the 126 lots within its territory and AGLC can serve the 14 lots within its territory with a clear line of demarcation with no need to amend the safety plan/map.

Lastly, the lots that AGLC refers to Buford illegally serving in its Petition were under construction prior to the adoption of the Hall Countywide Safety Plan and thus are not "illegal" but an oversight in mapping.

For the foregoing reasons, Buford respectfully requests that the Commission deny AGLC's Petition and Amendment to the Hall Countywide Safety Plan.

This 29th day of November 2023.

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[1] See Memorandum from Michelle Thebert to Nancy Tyer, September 21, 2020, concerning the proposed division of a subdivision between Buford and Lawrenceville. Docket # 29330, Document 182710.

CERTIFICATE OF SERVICE

This is to certify that I have this day served the foregoing City of Buford's Objection To AGLC's Petition for Expedited Approval of Amendment to Hall Countywide Safety Plan by electronic mail to the parties listed below:

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This 29th day of November 2023.

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