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DOCKET# 37024
DOCUMENT# 217305

Docket No. 37024

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

REF: DIMP (Annual Review) Inspection # AT23-038

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Pedro Cherry

On October 17, 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 AT23-038 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: AT23-038

OPERATOR: AGL - Operations and Engineering

INVESTIGATOR: Alan Towe

INSPECTION DATE: October 17, 2023 REPORT MAILED DATE: January 31, 2024

Any questions concerning this report may be directed to the above address or by telephoning (404) 463-6526.

1. PURPOSE OF INSPECTION

To conduct an annual review of the Operators Distribution Integrity Management Program (DIMP) for compliance with the minimum federal standards in 49CFR Part 192, SubPart P.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.467	External corrosion control: Electrical isolation.	AT16-048	10/4/2016
192.361(b)	Support and backfill. Each service line must be properly supported on undisturbed or...	AT17-016	4/5/2017
192.463(a)	Each cathodic protection system required by this subpart must provide a level of cathodic...	AT17-027	8/14/2017
192.747(b)	Each operator must take prompt remedial action to correct any valve found inoperable, unless the...	AT17-027	8/14/2017
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	AT17-027	8/14/2017
192.745(b)	Each operator must take prompt remedial action to correct any valve found inoperable, unless...	AT17-027	8/14/2017
192.615(a)(1)	Receiving, identifying, and classifying notices of events which require immediate response by the...	AT17-027	8/14/2017
192.615(a)(11)	Actions required to be taken by a controller during an emergency in accordance with § 192.631.	AT17-027	8/14/2017
192.475(a)	Corrosive gas may not be transported by pipeline, unless the corrosive effect of the gas on the...	AT17-027	8/14/2017
192.1007(e)	Measure performance, monitor results, and evaluate effectiveness.	AT19-031	7/31/2019
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JB21-005	5/1/2021
192.616(c)	The operator must follow the general program recommendations, including baseline and supplemental...	AT21-015	5/11/2021
192.631(b)	Each operator must define the roles and responsibilities of a controller during normal, abnormal...	JB21-022	8/18/2021
192.631(d)(3)	Train controllers and supervisors to recognize the effects of fatigue	JB21-022	8/18/2021
192.631(e)(5)	Monitor the content and volume of general activity being directed to and required of each...	JB21-022	8/18/2021
192.631(h)(6)	Control room team training and exercises that include both controllers and other individuals...	JB21-022	8/18/2021
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT21-030	11/9/2021
192.805(f)	Communicate changes that affect covered tasks to individuals performing those covered tasks	AT21-030	11/9/2021
192.805(g)	Identify those covered tasks and the intervals at which evaluation of the individual's...	AT21-030	11/9/2021
192.805(i)	After December 16, 2004, notify the Administrator or a state agency participating under 49 U.S.C...	AT21-030	11/9/2021

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On October 17, 2023, Staff conducted an on-line annual review of Atlanta Gas Light Company's Distribution Integrity Management Program (DIMP) as required by the PHMSA State Program Guidelines.

During this inspection, the Operator was represented by:
Rick Slagle - Director, Compliance & Quality Assurance
Ralph McCollum - Compliance Engineer
Keven Graham - Director, DIMP & Analytic Services
Pa Alieu Lette – Asset Protection Manager,
Eban Grasti – Asset Protection Director
Stephanie Graves – Dimp Analyst
Taylor Talkington - Manager, DIMP
Chris Jackson - Analyst II, Dist Integrity
Daniel Mayer - Analyst II, Dist Integrity

Commission Staff was represented by:
Alan Towe – Lead Inspector
Jeff Baggett – Facilities Protection Supervisor
Jack Hewitt - Pipeline Safety Inspector
Michelle Thebert – Facilities Protection Director
Brant Sweat - Pipeline Safety Inspector

At the time of this inspection the Atlanta Gas Light Company – Operations & Engineering, was under 21 previously existing probable violations. These violations are being addressed separately by the FPU Supervisor and the Director, Compliance and Pipeline Risk Management.

Under the PHMSA State Guidelines, the Facility Protection Unit has been tasked to perform an annual review of the Operators integrity management programs. On October 17, 2023, Staff met with the Operators personnel and reviewed the following records:

1) The 2022 numbers for Part C of the 7100 broken out to identify steel/PE leaks on the DI-5-Year Leak Data sheet.
2) 2022 leak survey numbers for business district VS non-business district on the DI-5-Year Leak Data sheet.

3) Updated threat listing on the DIMP Implementation worksheet.
4) The 2022 numbers for Part D on the 7100 broken out into the applicable sub-categories.

Staff reviewed the information provided by the Operator and found that their DIMP Plan is reviewed twice each calendar year. Staff then discussed the following items with their representatives: 1) Top 10 Identified Risk/Threats 2) 2018 - 2022 PHMSA 7100's – Part C Leak Data 3) 2020 PHMSA 7100 – Part D Excavation Damage Data 4) 2020 Business District leak survey numbers.

As a result of this inspection Staff noted no probable violations of the minimum federal safety standards.

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.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:	)	
	)	
No Violation Report	)	**DOCKET NO. 37024**
Atlanta Gas Light Company	)	
Inspection AT23-038 on October 17, 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 *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 6th day of February 2024:

Cathy Nesbitt

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