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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 No. 37062

DOCKET# 37062
DOCUMENT# 217456

City of LaGrange Natural Gas Department
(Transmission)
200 Ridley Ave
LaGrange, GA 30240

REF: IMP (Protocol A) Inspection # DJ23-036

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Ms. Meg Kesley

On October 16, 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 DJ23-036 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. 37062 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: DJ23-036

OPERATOR: City of LaGrange Natural Gas Department (Transmission)

INVESTIGATOR: Daphne Jones

INSPECTION DATE: October 16, 2023 REPORT MAILED DATE: February 8, 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 inspection of the Operator's Gas Transmission Integrity Management Program (IMP) to verify that the methods defined in §192.903 High Consequence Area (1) and/or §192.903 High Consequence Area (2) are applied to each pipeline for the identification of high consequence areas.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

Cleared on 10/16/2023

Violation	Description	Inspection#	Date
192.603(c)	General - The Associate Administrator or the State Agency that has submitted a current...	JB22-022	8/8/2022

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

From October 16-18, 2023, Staff reported to the City of LaGrange Gas Department to conduct an inspection of the Operator's Gas Transmission Integrity Management Program (IMP) to verify that the methods defined in §192.903 High Consequence Area (1) and/or §192.903 High Consequence Area (2) are applied to each pipeline for the identification of high consequence areas. Staff also conducted an operator qualification personnel evaluation (Protocol 9) of the Operator's employee(s) for compliance with the minimum federal standards in 49CFR §192, Subpart N.

During this Inspection, the Operator was represented by:
Jeremy Patrick – Gas Regulations & Supply Spec
Gene Taylor – MGAG/SRCS (Consultant)

Commission Staff was represented by:
Daphne Jones – Lead Inspector
Joseph Jones – Pipeline Safety Inspector
Daniel Clemmons – Pipeline Safety Inspector

At the time of this inspection, the City of LaGrange had one (1) previously existing probable violation. This violation will be addressed under Follow-Up Inspection Number DJ23-035.

NO VIOLATIONS FOUND

During this inspection Staff reviewed the City of LaGrange's Operations and Maintenance plan; Section 15 'Pipeline Integrity Management' and records that demonstrate how they checked for identified sites along the transmission pipeline. This inspection consisted solely of protocol A since there have been no High Consequence Areas (HCAs) identified by the Operator since their last inspection on 12/2/2021. The City of LaGrange has determined that there are no High Consequence Areas on its Transmission Line and, therefore, no Covered Pipeline Segments. As provided by §192.907(a), City of LaGrange is not required to develop an Integrity Management Program.

Staff noted that Operator has not identified any HCA's on either of their transmission pipelines. The Operator has system maps and records that indicate that there are no HCAs in their system. Based on the Operators Annual Report (7100.2) and patrolling records, no HCAs have been identified at this time. Operator has identified Five Moderate Consequence Areas (MCAs) location. Operator currently states they are in Class 1, 2, and 3 along their pipeline; however, they use the PIR Method 2 for determining HCA's. The Operator has no HCAs on their 45.35 miles of steel transmission line in Coweta and Troup Counties. Annually, operator patrols facility to determine if HCAs exist. Patrol records are documented, and Staff examined the last patrol records from CY2022.

During this inspection, Staff conducted three Operator Qualification Protocol 9 field verification inspections to ensure that covered task(s) were being performed in accordance with appropriate operator-approved procedures, that the procedures were present at the job site, and that the individuals performing the observed covered task(s) were adhering to the operator-approved procedures as written.

During the field evaluations, Staff observed Jeremy Patrick, Regulation & Supply Specialist – Gas Division, perform Task #0101: Inspect Rectifier and Obtain Readings, qualified on 5/11/2021 and expires 5/11/2026, Task #1261: Walking Gas Leakage Survey, qualified on 5/5/2022 and expires 5/5/2025 and Task #1291: Locate Underground Pipelines, qualified on 4/28/2023 and expires 4/28/2024. Staff observed that the Operators personnel followed the task procedure and applicable manufactures written procedure.

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. 37062**
City of LaGrange Gas Department	)	
Inspection DJ23-036 on October 16, 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 LaGrange Gas Department (Transmission)* 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

*Meg Kesley, City Manager
City of LaGrange
200 Ridley Avenue
LaGrange, GA 30241
mkelsey@lagrangega.org

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

Respectfully Submitted this 14th day of February 2024:

Cathy Nesbitt

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