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Georgia Public Service Commission

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244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
psc.ga.gov

Docket No. 37018

DOCKET# 37018
DOCUMENT# 217482

City of Adairsville Gas System
116 Public Square
Adairsville, GA 30103

REF: Follow Up Inspection # DC23-034

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Ms. Pamela Madison

On November 16, 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 DC23-034 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. 37018 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: DC23-034

OPERATOR: City of Adairsville Gas System

INVESTIGATOR: Daniel Clemmons

INSPECTION DATE: November 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 a follow-up inspection of the Operators previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
Under Consent Agreement	Operator is under a Consent Agreement.	JB18-005	5/30/2018
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JB18-012	7/17/2018
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	KR22-016	5/23/2022

3. CLEARED VIOLATIONS

Cleared on 11/16/2023

Violation	Description	Inspection#	Date
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	KR22-016	5/23/2022
192.615(c)	Each operator shall establish and maintain liaison with appropriate fire, police, and other...	KR22-016	5/23/2022
192.479(a)	Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the...	KR22-016	5/23/2022
192.615(a)(2)	Each operator shall establish written procedures to minimize the hazard resulting from a...	KR22-016	5/23/2022
192.455 (e)	Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an...	KR22-016	5/23/2022
192.147(a)	Each flange or flange accessory (other than cast iron) must meet the minimum requirements of...	KR22-016	5/23/2022

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF ADAIRSVILLE GAS SYSTEM / FOLLOW-UP INSPECTION
INSPECTION NUMBER DC23-034 / DOCKET NUMBER 37018

On December 4, 2023, Pipeline Safety Staff reported to the City of Adairsville Gas System and performed a follow-up inspection on the Operator's previously existing probable violations that were cited under JB18-012, KR22-016, and LB17-006.

During this investigation, the Operator was represented by:
Steve Smith – Gas System Manager
Maurice Chaney - MGAG/SRCS (Consultant)

Commission Staff was represented by:
Daniel Clemmons – Lead Inspector
Jeff Baggett – Pipeline Safety Inspector

At the time of this inspection the City of Adairsville Gas System was under eight (8) previously existing probable violations. This report also addresses one Consent Agreement item from Inspection Number LB17-006.

PROBABLE VIOLATIONS CLEARED

1. In regard to the Probable Violation of 49CFR, §192.615(c) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "The City of Adairsville failed to establish and maintain liaison with all required public officials as required for liaison, no liaison was established or maintained with utility operators in their service area.

   OPERATOR RESPONSE: In their response letter to Inspection Number KR22-016, dated February 28, 2023, the City of Adairsville requested an Informal Conference to discuss the basis for this Notice of Probable Violation.

   FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff reviewed the Operators response and found that they had not yet received the informal conference they had requested.

   NOTE FROM SUPERVISOR REVIEW: During the review of this inspection it was found that this probable violation was issued based on guidance which PHMSA has subsequently rescinded.

   Staff determined that this violation could be cleared at this time.

2. In regard to the Probable Violation of 49CFR, §192.605(a) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "Based on the observed deficiencies indicated in this report, Staff determined that the Operator has failed to prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response."

   OBSERVED DEFICIENCIES

   a. In regard to the observed deficiency of 49CFR, §192.727(a) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "The Operator failed to provide records demonstrating that the contractor who abandoned and deactivated a section of main and a regulator station did so in accordance with 192.727 (a) and their O&M Procedures.

      OPERATOR RESPONSE: In their response letter to Inspection Number KR22-016, dated February 28, 2023, the Operator stated: "The City of Adairsville has obtained a statement from the

contractor for the referenced project that the abandoned facilities were purged and capped according to Adairsville's Procedures and the contract documents."

FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff reviewed the Operators response and the documents provided by the Operator and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

b. In regard to the observed deficiency of 49CFR, §192.747(a) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "The City of Adairsville to follow their procedures for ensuring that each valve, the use of which may be necessary for the safe operation of a distribution system, is checked and serviced at intervals not exceeding 15 months, but at least once each calendar year."

Staff proposed a civil penalty of $5,000.00 for this probable violation.

OPERATOR RESPONSE: In their response letter to Inspection Number KR22-016, dated February 28, 2023, the Operator stated: "The City of Adairsville has performed valve maintenance on schedule in 2020, 2021, and 2022; and will perform valve maintenance on schedule in 2023."

FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff reviewed the Operator's response and the documents provided by the Operator and found that it does adequately address this violation.

Staff found that the Operator has not addressed the proposed civil penalty or received their informal conference to discuss this item.

Staff determined that this violation could be cleared at this time.

c. In regard to the observed deficiency of 49CFR, §192.743(a) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "The Operators Gas Town border regulator station's relief device lack sufficient capacity to protect the downstream pipeline as required by §192.743(a)."

OPERATOR RESPONSE: In their response letter to Inspection Number KR22-016, dated February 28, 2023, the Operator stated: "The City of Adairsville has upgraded its Town Border station with new regulators and reliefs."

FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff reviewed the Operators response and the documents provided by the Operator and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

3. In regard to the Probable Violation of 49CFR, §192.479(a) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "Adairsville Gas failed to clean and coat each portion of their pipeline that is exposed to the atmosphere as required by §192.479."

OPERATOR RESPONSE: In their response letter to Inspection Number KR22-016, dated February 28, 2023, the Operator stated: "The City of Adairsville will perform atmospheric corrosion monitoring and will clean and coat all above ground facilities identified as deficient by October 31, 2023."

FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff reviewed the Operators response and the documents provided by the Operator and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

4. In regard to the Probable Violation of 49CFR, §192.147(a) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "Adairsville Gas failed to ensure that each of their flanges or flange accessories meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP44 as required by §192.147(a)"

   OPERATOR RESPONSE: In their response letter to Inspection Number KR22-016, dated February 28, 2023, the Operator stated: "The City of Adairsville corrected the issue at station mentioned at time of discovery and will perform a complete inspection of all regulator stations to ensure all bolts meet the minimum requirements."

   FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff reviewed the Operators response and the documents provided by the Operator and found that it adequately addresses this violation.

   Staff determined that this violation could be cleared at this time.

5. In regard to the Notice of Amendment, which was issued for 49CFR, §192.615(a)(2) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "The Operator must amend their procedures to ensure they can maintain communication with fire, police and public officials in the event they were to lose their cell or land line services."

   OPERATOR RESPONSE: In their response letter to Inspection Number KR22-016, dated February 28, 2023, the Operator stated: The City of Adairsville has purchased handheld radios to provide a backup means of maintaining communications."

   FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff reviewed the Operators response and the documents provided by the Operator and found that it adequately addresses this violation.

   Staff determined that this violation could be cleared at this time.

6. In regard to the Notice of Amendment, which was issued for 49CFR, §192.615(c) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "The City of Adairsville must amend their procedures to ensure that they are establishing and maintaining liaison with all required public officials, specifically utility operators in their service area for emergency preparedness."

OPERATOR RESPONSE: In their response letter to Inspection Number KR22-016, dated February 28, 2023, the Operator stated: "The City of Adairsville requests an Informal Conference to discuss the basis for this Notice of Amendment."

FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff reviewed the Operators response and found that they had not yet received the informal conference they had requested.

NOTE FROM SUPERVISOR REVIEW: During the review of this inspection it was found that this probable violation was issued based on guidance which PHMSA has subsequently rescinded.

Staff determined that this violation could be cleared at this time.

7. In regard to the Notice of Amendment, which was issued for 49CFR, §192.455(e) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "The City of Adairsville must amend their procedures to address the requirements of §192.455(e).

   OPERATOR RESPONSE: In their response letter to Inspection Number KR22-016, dated February 28, 2023, the Operator stated: "By June 30, 2023, the City of Adairsville will implement a Construction Manual that will prohibit the installation of aluminum materials underground on its gas system."

   FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff reviewed the Operators response and the documents provided by the Operator and found that it adequately addresses this violation.

   Staff determined that this violation could be cleared at this time.

PROBABLE VIOLATIONS CONTINUING

1. In regard to the Notice of Amendment, which was issued for 49CFR, §192.181(a) which was cited in Inspection Number KR22-016; in that inspection Staff stated: "The City of Adairsville must amend their procedures to address the placement of distribution line valves for their system of §192.181(a).

   OPERATOR RESPONSE: In their response letter to Inspection Number KR22-016, dated February 28, 2023, the Operator stated: "By June 30, 2023, the City of Adairsville will implement a Construction Manual that will include provisions for the placement of critical valves in newly constructed Distribution Mains."

   FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff reviewed the Operators response and the documents provided by the Operator and found that their amended procedure contains a list of considerations for the placement of valves, but is not a procedure that tells their employees when or where a valve must be placed to ensure that they have complied with the requirements of §192.181(a), or to ensure that they can meet the requirements of §192.615(a)(6).

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

2. In regard to the probable violation of 49CFR §192.605(a) which was cited in Inspection Number JB18-012; in that inspection Staff stated that: "The City of Adairsville failed to pothole and expose their

marked facilities at the point where their bore was to cross their marked facility, as required by their procedure."

Staff proposed a civil penalty of $10,000.00 for this probable violation.

OPERATOR'S FIRST RESPONSE: In their response letter to Inspection Number JB18-012 dated November 14, 2018 Adairsville requested an informal conference with the Director to discuss the NOPV and proposed civil penalty. The Operator also stated: "Adairsville has reviewed the requirements to pothole to locate marked facilities at the point where a bore is to cross the marked facilities with personnel responsible for performing this action to ensure their understanding and future compliance. Adairsville has also advised the Georgia Department of Transportation ("GDOT") of this requirement and requested GDOT to advise its contractor(s) and subcontractor(s) performing work in the vicinity of Adairsville's natural gas facilities of this requirement."

FIRST FOLLOW-UP INSPECTION: On May 6, 2019 Staff reported to the City of Adairsville to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number DJ19-018) In this inspection Staff stated: "During this inspection (Inspection Number DJ19-018), Staff determined that the Operator has requested an informal conference with the Director for the proposed civil penalty."

OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ19-018.

SECOND FOLLOWUP INSPECTION: On May 23rd 2022, Staff reported to the City of Adairsville to perform a Follow Up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number KR22-015) In this inspection Staff stated: "During this inspection Staff determined that the Operator has not paid the proposed civil penalty or had the informal conference to discuss the NOPV and proposed civil penalty."

OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number KR22-015.

THIRD FOLLOWUP INSPECTION: During this inspection (DC23-034), Staff determined that the Operator has not paid the proposed civil penalty or had the informal conference to discuss the NOPV and proposed civil penalty. However, Staff contacted the Operator and the Director and scheduled an informal conference with the Director for December 18, 2023.

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

CONSENT AGREEMENT ITEM CONTINUING

On Jan 23, 2018, the City of Adairsville signed a Consent Agreement with the Commission to address the probable violation and proposed civil penalty for the violation of 49CFR §192.605(a) which was cited in Inspection Number LB17-006.

FIRST FOLLOWUP INSPECTION: On May 29, 2018, Staff conducted a Follow-Up inspection (Ref: Inspection Number JB18-005). In this inspection, Staff stated that: "During this inspection Staff found that on Jan 23, 2018, the City of Adairsville signed a Consent Agreement with the Commission to address the probable violation and proposed civil penalty for the violation of 49CFR §192.605(a) which was cited in

Inspection Number LB17-006. Staff reviewed each of the items from the Consent Agreement and determined the following:

> "Consent Item b) - Adairsville shall develop and deliver a presentation at the 2018 Georgia Pipeline Safety Seminar describing the events leading up to the Incident in Adairsville on January 31, 2017 and the City's response to this Incident. This will cost approximately $1,000.00 and shall be complete in April 2018.
>
> STAFFS FINDINGS: Staff found that the Operator did not complete this item. With the permission of the Director, the time frame for completion of this presentation has been moved to the 2019 Pipeline Safety Seminar."

OPERATORS FIRST RESPONSE: The Operator noted that no violations were noted during this inspection. A notification was sent to the GPSC Director by electronic mail for Inspection Number JB18-005.

SECOND FOLLOW-UP INSPECTION: On August 1, 2018, Staff conducted an operator qualification personnel evaluation (Protocol 9) (Inspection Number JH18-030). In this inspection, Staff stated that: "At the time of this inspection, the City of Adairsville was under a consent agreement for a previous violation (Ref JB18-005); and one (1) probable violation (Ref. JB18-012). Staff determined that there were no Consent Agreement terms to follow up on, and the Operator had not yet received Inspection Number JB18-012."

OPERATORS SECOND RESPONSE: In their response to Inspection Number JH18-030, dated November 14, 2018, the City of Adairsville did not address the outstanding terms of the consent agreement for Inspection Number LB17-006.

THIRD FOLLOW-UP INSPECTION: On May 6, 2019 Staff reported to the City of Adairsville to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number DJ19-018) In this inspection Staff stated: "During this inspection (Inspection Number DJ19-018), Staff verified with the permission of the Director, the time frame for completion of this presentation has been moved to the 2020 Pipeline Safety Seminar. Staff advised the Operator that they would remain subject to periodic monitoring of the consent agreement terms until the final completion date of January 31, 2022."

OPERATOR RESPONSE: Staff found no response from the Operator for Inspection Number DJ19-018.

FOURTH FOLLOW-UP INSPECTION: During this inspection (Inspection Number DC23-034) the Operator advised that they no longer wanted to provide a presentation at the pipeline safety seminar. Staff contacted the Director and scheduled an informal conference with the Operator for December 18, 2023 to discuss this item.

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 Adairsville

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37018

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	$_____ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ 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:	)	
	)	
Clear and Continuing Violation Report	)	**DOCKET NO. 37018**
City of Adairsville Gas System	)	
Inspection DC23-034 on November 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 Adairsville Gas System* 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

*Pamela Madison, City Manager
City of Adairsville Gas System
116 Public Square
Adairsville, GA 30103
pmadison@adairsvillega.net

*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