OPERATOR RESPONSE FORM

Operator Name: Liberty Utilities

Informal Conference Requested: Yes ☐ No ☒

Docket Number: 37064

Responses required within **30 days of electronic mail**. Provide the following information for this report:

Response to Inspection Number: AT23-044

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: 192.1007(a)(5) ☒ 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: Attached

Response Provided by: John Patton (Name / Title) Date: 3/1/2024

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: _____

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: LIBERTY UTILITIES	}
(PEACH STATE NATURAL GAS) CORPORATION	}
PROBABLE VIOLATION REPORT	} DOCKET NO. 37064
INSPECTIONS AT23-044 ON NOVEBMER 27, 2023	}

OPERATOR RESPONSE TO 192.1007(a)(5)

Liberty Utilities failed to capture and retain all data on their new polyethylene plastic pipeline being installed as required under 192.1007(a)(5).

Response: Liberty captured and retained all data in compliance with 49 CFR 192. Liberty installs plastic pipe manufactured in accordance with 49 CFR 192.59(a) and marked in accordance with 49 CFR 192.63(a) and 49 CFR 192.63(e). As-built data in accordance with 49 CFR 192.1007(a)(5) including "the location where the new pipeline is installed and the material of which it is constructed" is captured and retained in a GIS database. While there are no specific requirements in 49 CFR 192 to capture the ASTM traceability code for plastic pipe, Liberty is now scanning the 16-character bar code containing the ASTM traceability code for plastic pipe and retaining that data as an attribute in a GIS database. As-built processes have been modified to ensure this data is captured for all plastic pipe installed from 2024 going forward.

Operator Response to Enforcement Action

Enforcement Action for: 192.1007(d) ☒ 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: Attached

Response Provided by: John Patton (Name / Title) Date: 3/1/2024

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: _____

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: LIBERTY UTILITIES	}
(PEACH STATE NATURAL GAS) CORPORATION	}
PROBABLE VIOLATION REPORT	} DOCKET NO. 37064
INSPECTIONS AT23-044 ON NOVEBMER 27, 2023	}

OPERATOR RESPONSE TO 192.1007(d)

Liberty Utilities failed to establish appropriate measures to reduce the threat of (Legacy) cross bores to their pipeline system as required under Part 192.1007(d).

Response: Liberty has adopted measures to reduce the threat of cross bores to our pipeline system including the adoption of procedures for trenchless installation of underground gas facilities to prevent the introduction of new cross bores into our pipeline system. These measures are being provided as Attachment AT23-044 – 2.1. Documentation demonstrating compliance with these procedures is stored electronically with each work order involving trenchless installation.

Future additional measures being planned across Liberty Utilities include a program to proactively identify and correct legacy cross bores. The planned multi-year approach with an initial project schedule and cost estimate will be developed in 2024, and funds budgeted to begin the plan in 2025. The plan and initial schedule will be shared with Facilities Protection Staff in the 4th quarter 2024.

GAS OPERATING PROCEDURE

Trenchless Installation Requirements

1. Purpose

The purpose of this document is to provide guidelines to install underground gas facilities using trenchless technology.

a. This applies to all types of gas underground facilities such as but not limited to; gas mains/services, gas regulator/take station related piping, LNG/Propane Air Plant related piping, Propane and Propane Air distribution system piping. The word gas as used in this document will apply to all these types of facilities.

b. This applies to both brand new installations as well as relays/replacements/repairs to existing gas facilities.

c. The following trenchless technologies are approved for use by trained and qualified personnel:

1) Horizontal Directional Drilling (HDD)
2) Piercing tools (hogs, moles, missiles, etc.)
3) Water boring equipment
4) Augur boring equipment, including pipe jacking
5) Plowing
6) Pipe-splitting

2. Responsibilities

Liberty Operations/Construction or Liberty Contractor shall be responsible to:

- Notify the applicable one call system in the work area.
- Contact facility owners, property owners etc., to obtain location information for facilities not covered under the One Call system along the proposed route. Locate these facilities in the potential cross bore path.
- Inspection of all premises for sewer/septic/storm drain facilities within the project area. Storm drains are defined as drainage piping connected to surface catch basin/s and underground holding/leaching structures and/or centralized storm water collection systems. Storm drains can be private or public. Storm drains are not a structures rain gutter/downspout system connected to a drywell.
- Project area is the planned path of the gas facility installation using trenchless technology. Note that depending on the configuration of the work zone, multiple sewer/septic/storm drain facilities, along with other underground utilities, must be located to prevent damage/cross bore to these facilities.
- Installation crews shall assess suitability for trenchless technology at job location. If all utilities/underground substructures, sewer/septic/storm drain facilities, or crossings cannot be verified, the installation crew shall not utilize trenchless technology methods to install our gas facility.
- Before any powered equipment or mechanical means is used to excavate, a cable avoidance tool (CAT)or equivalent shall be used to check the vicinity and the path of the trenchless technology operation.

3. General Trenchless Operations

- For all trenchless technology tooling follow the equipment manufacturers recommendations.
- Plastic gas pipe shall be:
  - Supported and protected from sagging and dragging along the ground surface, substructures, and the edges of the trench openings as it enters the borehole.
  - Use rollers as required.
  - For installations that require the joining of pipe sections, plastic gas pipe shall be butt fused.
- Inspection of plastic gas pipe:
  - Inspect the surface of the plastic pipe for physical damages (scratches and/or gouges that exceed 10% of wall thickness).
  - If such damages exist, check all visible plastic in any service and/or test opening excavations; determine the point of damage and remedy.
  - Continue to pull the plastic pipe into the receiving pit until it shows no evidence of such damages for a continuous length of approximately **9 feet in the US and 3 meters in CA**
- Inspection of steel gas pipe:
  - Inspect pipe for gouge or pipe wrapping damage and make necessary repairs.

- For plastic gas pipe installations, a breakaway link/weak link shall be installed in line between the swivel and the leading end of the pipe.
  - When pulling plastic gas pipe by hand, a breakaway link/weak link is not required.

- Tracer wire shall be installed and connected in such a manner that electronic locating of the plastic pipe will be possible. Follow proper O&M Manual tracer wire specifications.
- Warning tape shall be installed at each end and over any other portions of the gas pipe installed by direct burial, including inside any test/inspection holes the pipe traveled through.
- Upon the completion of the gas facility installations, the newly installed facilities shall be accurately located using approved locating tools/methods, both horizontally and vertically, and the location shall be marked at the surface.
- Cease trenchless installation operations if an unidentifiable, atypical, or unanticipated resistance or sudden movement is encountered during the installation operation. Proceed only after the source of the disturbance has been identified and/or eliminated and in the judgment and experience of the trained operator.
- All reasonable caution shall be exercised to ensure that other underground substructures/facilities are not encountered.
- Particular care shall be taken to ensure that existing substructures are not penetrated. If any substructure is known to be damaged or cross bored as the operation is proceeding, stop the installation process and notify the appropriate operator/owner of the damaged substructure.
- The trenchless technology equipment must be visually observed as it passes through any test pit/excavation/daylight hole installed along the path. The equipment must pass through such that it maintained both the minimum clearances to any underground substructures/facilities and that it showed no signs of having damaged any of these substructures/facilities along its path.
- Damaged or cross bored existing substructures must be remediated/repaired immediately unless approval to delay is given by a Liberty Manager or above.

- HDD Only-Use electronic locating equipment to monitor the location of the drill head during the drilling operation and to accurately document the location of the pipe/cable/duct/conduit once installed. Locations should be marked or staked as required. The drill head shall be inspected at test pits/excavations/daylight holes previously made at substructure crossing locations to ensure adequate clearance.
- **Note:** If other trenchless technology methods provide the capability to provide signals to electronic locating equipment, locations should be marked or staked as required.

4. Recordkeeping

- Appropriate records/as-builts of the installation via trenchless technology shall be made as outlined in the applicable O&M Manual/Procedure/Engineering standard that applies for your area.
- **NH Only**: GPS points should be taken to capture location of the newly installed facility. For HDD, pipe depths and GPS points should also be captured.

5. Municipal/Governmental Restrictions on the use of Open Trenching/Excavations

- If an installation using trenchless technology is required under these circumstances and no test holes/excavations/daylight holes can be made, approval to use trenchless technology must be made by a Liberty Operations Manager or above.
- The installation plan must be made by Engineering and signed off by a Manager of Engineering or above.
- Pre-Installation Camera inspection/locating must be performed on all sewer/septic/storm drain facilities in the project scope.
- Project Scope is defined as **15 feet in the US, 5 meters in CA**, on either side of the proposed installation path.
- Post-Installation Camera inspections must be performed to positively identify that there were no damages/cross bores made into any sewer/septic/storm drain system facilities along the path of the installation. See Section 6, Figure 3 - Main Installation.
- **Note:** Post-Installation Camera inspections are not required if it is determined that the newly installed facility and the existing sewer/septic/storm drain facilities have a minimum of **3 feet in the US, 1 meter in CA depth separation** with approval by a Liberty Operations Manager or above.
- The newly installed gas facilities must be installed so that both the horizontal and vertical location is able to be accurately determined and recorded without the need to excavate.

Massachusetts Only:

A Professional Engineer's stamp is required, as stated under 220 CMR 105.00: Use of Professional Engineers for Gas Utility Work, when using trenchless technology for pipe greater than four inch.

6. Sewer Pipes/Septic/Storm Drain Systems

Notify the resident of premises, whether a Liberty customer or not, of our intent to perform trenchless work and need to gain access to their premises to verify the location of their underground facilities in the planned path of the installation. If you cannot get into the customers premise, then **do not** proceed with using trenchless technology.

Trenchless Installation Operations Procedure Variance Form

Use this Form to Grant C&M and/or contractors a variance from the required sewer identification program or similar work. This form can also be used for emergency approval or a variance from insurance requirements.

Click to download form

Locating sewer pipe/septic/storm drain system process

Clearance between the gas facilities to be installed and sewer pipe/septic/storm drain system shall be assessed prior to performing trenchless operations. This may involve multiple sewer pipes/septic/storm drain systems within the project scope. Project scope is defined as **15 feet in the US, 5 meters in CA**, on either side of the proposed installation path. See Figures 1, 2, 3 and 4 below.

Figure 1

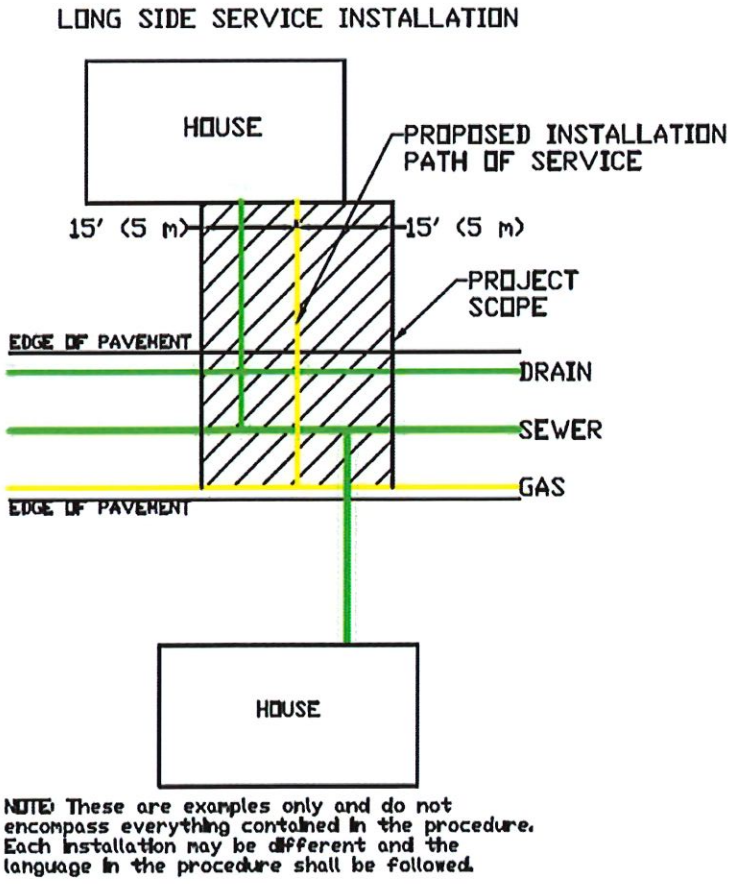


Figure 2

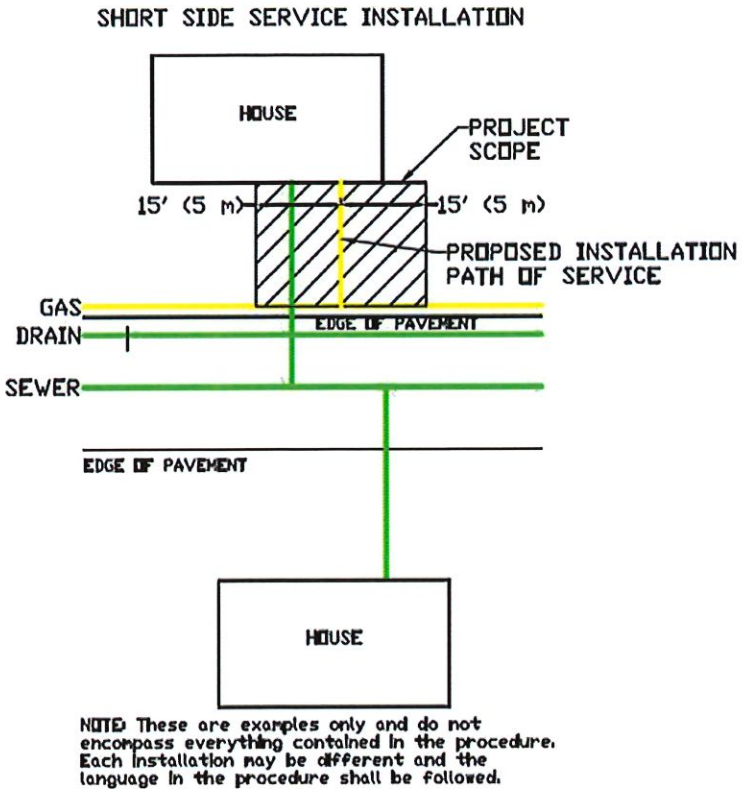


Figure 3

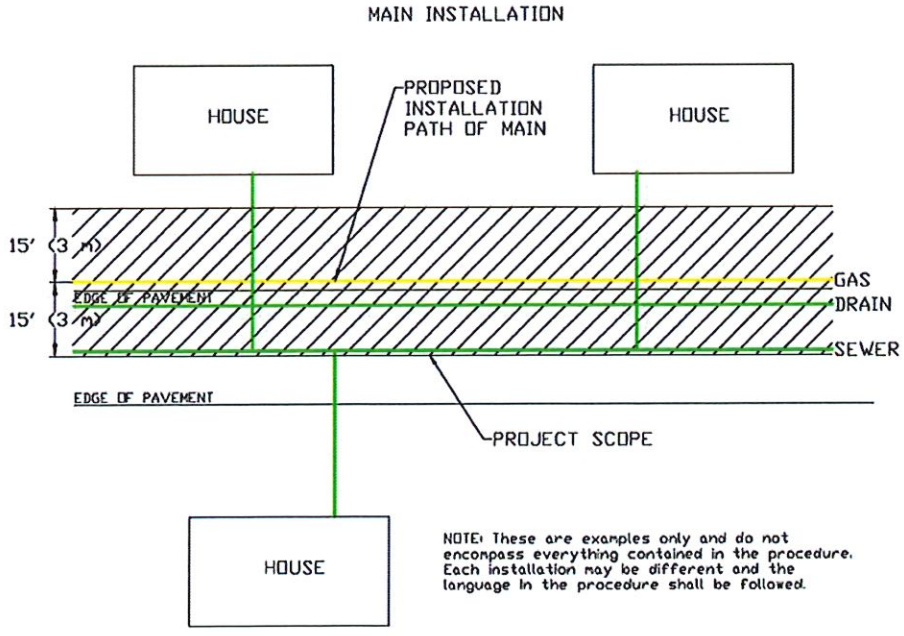
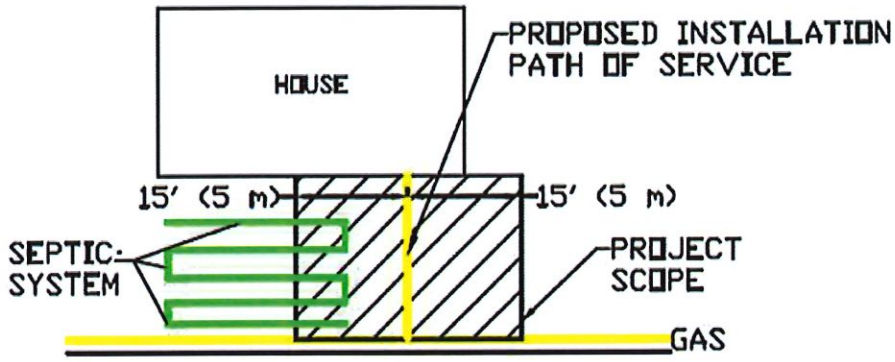


Figure 4

SERVICE INSTALLATION NEAR SEPTIC



NOTE: These are examples only and do not encompass everything contained in the procedure. Each installation may be different and the language in the procedure shall be followed.

Pre-Installation Camera Inspection/Locate

Pre-Installation Camera inspection/locate **must** be performed to determine the location of all sewer/septic/storm drain systems within the project scope. This inspection/locate of these facilities can be performed using camera equipment that has built in sonde type technology that determines both the horizontal and vertical location or it can be performed using separate camera technology and separate sonde type technology that determines both the horizontal and vertical location.

Alternatively, if verification of the sewer/septic/storm drain via the Alternative Verification Methods, proves that the sewer/septic/storm drain is outside the project scope a pre-installation Camera Inspection/Locate is not required with approval by a Liberty Operations Manager or above.

Alternative Verification Methods:

- Use of stand-alone sonde type technology which determines both the horizontal and vertical location of the sewer pipe/septic/storm drain systems. A stand-alone Camera Inspection must also be performed if using separate sonde type locating equipment.
- As-Builts drawings of sewer mains and services.
- As-Builts drawings of septic systems.
- As-Builts drawings of storm drain systems.
- As-Built drawings that show a sewer/septic/storm drain facility potentially in the path of the proposed gas facility shall not be the sole source of locating means of these facilities.
- Caution shall be exercised when performing these inspections/locating. Facilities may be interconnected with adjoining premises, garages, outbuildings etc. The configuration of the work zone may require the inspection/locating of multiple sewer/septic/storm drain facilities to ensure a complete locating of these facilities.

If a Pre-installation Camera inspection/locate was not complete and there was not enough information from the Alternative Verification Methods to prove the sewer/septic/storm was outside the project scope, then Trenchless Technology cannot be utilized.

7. Trenchless Technology Site Assessment Requirements

General Site Assessment Requirements

A daily job briefing shall be conducted at the work site. An addendum to the general job briefing form shall be used for trenchless equipment operations. See example Attachment 1: Job Briefing – Trenchless Technologies Addendum. Similar job brief forms may be acceptable and utilized.

⚠	Briefs shall be repeated if job scope changes significantly and new risks are encountered. A job site safety brief shall be conducted that addresses site specific issues for a particular job. Identify potential cross bore locations and status of locating facilities in the area.

Review the Work Location to Determine

- Location, depth, and proximity of trenchless technology installation to all subsurface structures/facilities along thepath.
- Minimum tolerance/clearance zone of **6 feet in the US and 2 meters in Canada horizontally** shall be maintained along the entire route of the installation path from all subsurface structures/facilities along the path of the installation.
- Minimum tolerance/clearance zone distances apply to instances where the trenchless installation path crosses at any angle existing subsurface structures/facilities, as well as when the installation path is parallel/running alongside the existing subsurface structures/facilities.
- Test pits/excavations/daylight holes shall be required when the installation path is less than the **6 feet/2 meters minimum tolerance/clearance zone distances**. This applies to any type of trenchless technology installation method.

A) Crossing an existing subsurface structure/facility

- Test pits/excavations/daylight holes shall be installed over the location of these facilities.
- The depth of these test pits/excavations/daylight holes is determined by using the planned depth of the facility being installed via trenchless methods, plus the required separation clearances as outlined in the applicable O&M Manual/Procedure/Engineering standard that applies for your area.

- **Example Only:** A gas facility is to be installed at a depth of 36 inches below grade and the clearance to underground structures for the location is 12 inches. The test pit/excavation/daylight hole minimum depth is 48 inches below grade.

In all cases, the trenchless technology equipment must be visually observed as it passes through any test pit/excavation/daylight hole installed. The equipment must pass through such that it maintained both the minimum clearances to any underground subsurface structures/facilities and that it showed no signs of having damaged any of these structures/facilities along its path.

NOTE: Depending on the depth of these test pits/excavations/daylight holes, existing subsurface facilities/structures may be uncovered while performing this work. Caution shall be exercised while performing this work to prevent damage to these facilities.

B) Running alongside an existing Non-Sewer/Septic/Strom Drain subsurface structure/facility

- Test pits/excavations/daylight holes shall be installed such that the existing subsurface

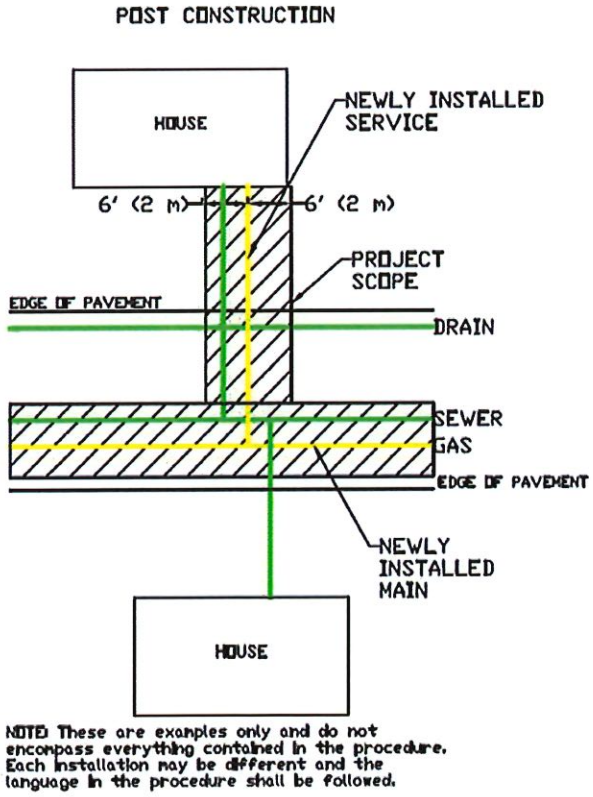
structure/facility is exposed, at intervals sufficient to determine that these structures/facilities are not damaged and minimum clearances were maintained along the path of the gas facility installation.

- Each work zone is different, and it is the responsibility of the installation crew to install adequate test pits/excavations/daylight holes to ensure safety. Consult with local Supervision/Management/Engineering to aid in that determination.

C) Running alongside an existing Sewer/Septic/Strom Drain subsurface structure/facility

- A Post-Installation Camera inspection shall be performed along the entire length of the Sewer/Septic/Storm Drain substructures/facilities where the gas facility was installed less than the **6 feet/2 meters minimum tolerance zone distances**. See Figure 5 below.
- Post-Installation Camera inspections are not required if it is determined that the newly installed facility and the existing sewer are a minimum of **3 feet in the US, 1 meter in CA, depth separation** with approval by a Liberty Operations Manager or above.
- Gas shall not be introduced into the gas facility until this Post-Installation Camera inspection is completed and that the inspection confirms no cross-bore or evidence of damage caused by the gas facility installation.

Figure 5



The gas facility shall be pressurized with air or an inert gas to aid in determination of a subsequent damage if the Post-Installation Camera inspection is not performed before the installation crew leaves the job site after the initial installation.

Note that work zone and location/installation conditions may require the following of one or any combination of the above requirements; A), B), or C).

Establish a route and assess suitability for trenchless installation by walking the route. Adjust the route where possible to minimize the potential for cross bores and maintain maximum separation between the trenchless route and existing underground substructures/facilities.

When installing Liberty gas facilities using any type of trenchless technology, maintain minimum installation clearances between the Liberty facility and the existing substructure/facility per the applicable O&M Manual/Procedure/Engineering standard that applies to your specific location and/or region.

There also may be Local requirements by owners/operators of these underground facilities that would require a visual confirmation that the newly installed Liberty gas facility did not negatively affect the facilities. Confirm with these Local owners/operators as to their specific requirements and follow their requirements as to visual confirmation, minimum separation, etc.

8. Operator Qualification Required Task [Qualified or Directed & Observed]

Refer to operator qualification plan

9. Attachments

Attachment 1: Job Briefing Supplement – Trenchless Technology Addendum

Job briefing – Trenchless Technology Addendum							
Date:	Location:						
Foreman:		Area Supervisor Notified			Main or Service		
Pipe material:	Pressure:	Diameter:		Job #			
Verify Existing Subsurface Structures Below within Scope of TT (Depth and Location) (Yes or No)							
Sewer		Electric		Communications		Water	
Cable		Gas		Septic:		Other	
Storm Drain							
Type of Trenchless Technology utilized							
Create list of premises where sewer/septic/storm drain system assessment was completed							
Address		Comments (Method sewer/septic/storm drain was verified)					

Review/Revision History

Revision Number	Description of Change	Revision Date
Rev. 1.0	Initial publication, 1st version	May 1, 2022
Rev. 1.1	Removed reference to "insertion" and item 1(c)(7) c. The following trenchless technologies are approved for use by trained and qualified personnel: 1) Horizontal Directional Drilling (HDD) 2) Piercing tools (hogs, moles, missiles, etc.) 3) Water boring equipment 4) Augur boring equipment, including pipe jacking 5) Plowing 6) Pipe-splitting ~~7) Insertion of existing underground gas mains/services~~	July 14, 2022
Rev. 2.0	Added Trenchless Installation Operations Procedure Variance Form in section 6.	February 3, 2023

Operator Response to Enforcement Action

Enforcement Action for: 192.1007(F) ☒ New Violation ☐ Continuing Violation
Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

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☒ 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: Attached

Response Provided by: John Patton (Name / Title) Date: 3/1/2024

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: _____

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: LIBERTY UTILITIES	}
(PEACH STATE NATURAL GAS) CORPORATION	}
PROBABLE VIOLATION REPORT	} DOCKET NO. 37064
INSPECTIONS AT23-044 ON NOVEBMER 27, 2023	}

OPERATOR RESPONSE TO 192.1007(f)

Liberty Utilities failed to periodically re-evaluate threats and risks on its entire pipeline and consider the relevance of threats in one location to other areas as required under Part 192.1007(f).

Response: As discussed during the inspection, Liberty has just completed a complete re-evaluation of its Distribution Integrity Management Program as required by 49 CFR 192.1007(f) in 2023. Liberty will conduct and document future annual reviews of threats and risks to demonstrate reviews are being conducted.

Operator Response to Enforcement Action

Enforcement Action for: 192.1007(e) ☒ 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: Attached

Response Provided by: John Patton (Name / Title) Date: 3/1/2024

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: _____

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: LIBERTY UTILITIES	}
(PEACH STATE NATURAL GAS) CORPORATION	}
PROBABLE VIOLATION REPORT	} DOCKET NO. 37064
INSPECTIONS AT23-044 ON NOVEBMER 27, 2023	}

OPERATOR RESPONSE TO 192.1007(e)

Liberty Utilities failed to establish a baseline for (excavation) threats and risks as required under Part 192.1007(e).

Response: Liberty tracks and evaluates performance in accordance with 49 CFR 192.1007(e)(1) including (i) number of hazardous leaks either eliminated or repaired as required by 192.703(c), (ii) number of excavation damages, (iii) number of excavation tickets, (iv) total number of leaks either eliminated or repaired categorized by cause, and (v) number of hazardous leaks either eliminated or repaired as required by 192.703(c) categorized by material. Liberty will establish and document in its written plan baselines for these measures. These baseline performance measures will be established by March 31, 2024 and shared with Facilities Protection Staff. These baseline measures will be reviewed during the periodic evaluations of the Distribution Integrity Management Program.