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FACILITIES PROTECTION UNIT DIRECTOR

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. 37917

DOCKET# 37917
DOCUMENT# 217772

Smarr Energy Facility
2100 East Exchange Place
Tucker, GA 30084-5336

ATTN: Mr. Jeff Swartz

On September 20, 2023 a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an on-site inspection of your gas system and found no violation of the Pipeline Safety Regulations. The enclosed inspection report numbered DL23-030 is provided for your information and file.

If you have any questions or comments concerning this report, please contact me at (404) 985-4271 or mthebert@psc.ga.gov. If you submit a written response to this inspection, please refer to Docket No. 37917.

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: DL23-030

OPERATOR: Smarr Energy Facility

INVESTIGATOR: David Lewis

INSPECTION DATE: September 20, 2023 REPORT MAILED DATE: February 27, 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

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On October 3, 2023 Staff reported to the Smarr Energy office of Oglethorpe Power to conduct an inspection of the Operators Gas Transmission Integrity Management Program (IMP) for compliance with the minimum federal standards in 49CFR Part 192, SubPart O.

During the inspection, the Operator was represented by:
Donna Johnson – Principal Regulatory Specialist
Jimmy Martin – O&M Supervisor (Smarr Energy)
Edward Conder – Southeastern Gas Engineering Consultant

Commission Staff was represented by:
David Lewis - Lead Inspector
Joe Jones - Pipeline Safety Inspector
Brant Sweat- Pipeline Safety Inspector

At the time of this inspection, Oglethorpe Power (Smarr Energy) had no previously existing probable violation.

NO VIOLATIONS FOUND

During this inspection Staff conducted a review of Oglethorpe Power (Smarr Energy) Operations and Maintenance plan, volume 1, version 3 dated February 11, 2020 along with maps and records. Staff used GA PSC Form 17-1 GT Protocol A and Risk Assessment form to conduct this inspection.

The Smarr Energy pipeline is a 2,597 feet long, 16" diameter steel transmission pipeline transporting nonodorized processed natural gas. The line is a high-pressure transmission pipeline that currently has a maximum allowable operating pressure (MAOP) of 1440 PSIG. Smarr Energy Facility receives gas from Kinder Morgan at a Kinder Morgan operated meter station and delivers gas to the Smarr Energy Facility Combustion Turbines where it is used as fuel gas for electric power generation.

Smarr Energy Facility uses Method 1 to determine the presence of an HCA affected by the pipeline. Method 1 relies primarily on the use of existing Class Location unit data, in conjunction with the identification of "identified sites." Staff was shown documentation how the area is regularly patrolled and leak surveyed to determine whether changes have occurred near the Smarr Energy pipeline that may indicate a change in class location or the presence of an HCA. All 2, 597 feet of the Smarr Energy pipeline is classified as within a Class 1 location. This pipeline is not located in a High Consequence Area (HCA), and has been classified as a Class 1 location for gas pipeline regulatory requirement purposes.

During this inspection Staff conducted OQ Protocol 9 field verification inspection and PHMSA Form 14 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 evaluation Staff observed:
Jacob Whitehead – Task #0001 Measure Structure to Electrolyte Potential – Qualified Thru 7/29/24; Task #1301 Install and Maintain Pipeline Markers – Qualified Thru 7/29/24; Task #1311 Inspect Pipeline Surface Conditions – Patrolling – Qualified Thru 7/29/24
Thomas Swan – Task #0001 Measure Structure to Electrolyte Potential – Qualified Thru 7/29/24; Task #1301 Install and Maintain Pipeline Markers – Qualified Thru 7/29/24; Task #1311 Inspect Pipeline Surface Conditions – Patrolling – Qualified Thru 7/29/24; ask #0101 Inspect Rectifier and Readings – Qualified Thru 11/11/24

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. 37917**
Smarr Energy Facility	)	
Inspection DL23-030 on September 20, 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 *Smarr Energy Facility* 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

*James Messersmith, Senior Vice President
Smarr Energy Facility
2100 East Exchange Place
Tucker, GA 30084
james.messersmith@opc.com

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

Respectfully Submitted this _____ day of March 2024:

Cathy Nesbitt

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