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FACILITIES PROTECTION UNIT DIRECTOR

# 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. 37932

DOCKET# 37932
DOCUMENT# 217773

Oglethorpe Power Corporation
2100 East Exchange Place
Tucker, GA 30084

ATTN: Mr. James Swartz

On October 5, 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 DL23-029 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. 37932.

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: DL23-029

OPERATOR: Oglethorpe Power Corporation

INVESTIGATOR: David Lewis

INSPECTION DATE: October 5, 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 Operators Gas Transmission Integrity Management Program (IMP) for compliance with the minimum federal standards in 49CFR Part 192, SubPart O.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On October 3, 2023 Staff reported to the Talbot 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 (Talbot 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 (Talbot Energy) had no previously existing probable violation.

NO VIOLATIONS FOUND

During this inspection Staff conducted a review of Oglethorpe Power (Talbot 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 Talbot Energy pipeline is five miles 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. Talbot Energy Facility receives gas from Kinder Morgan at a Kinder Morgan operated meter station and delivers gas to the Talbot Energy Facility Combustion Turbines where it is used as fuel gas for electric power generation.

Talbot 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 Talbot Energy pipeline that may indicate a change in class location or the presence of an HCA. All five miles of the Talbot 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
Task #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. 37932** |
| **Oglethorpe Power Corporation** | ) | |
| **Inspection DL23-029 on October 5, 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 *Oglethorpe Power Corporation* 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
Oglethorpe Power Corporation
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 5th day of March 2024:

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