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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. 37054

DOCKET# 37054
DOCUMENT# 218050

Fort Valley Utility Commission
P. O. Box 1529
Fort Valley, GA 31030

REF: Comprehensive Inspection # JS23-013

☒ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Clay Walker

On March 27, 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 JS23-013 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. 37054 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: JS23-013

OPERATOR: Fort Valley Utility Commission

INVESTIGATOR: Jason Smith

INSPECTION DATE: March 27, 2023 REPORT MAILED DATE: July 11, 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 comprehensive inspection of Fort Valley Utility Commission's plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Part(s) 191 and 192.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JJ23-008	1/30/2023

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	JS23-013	3/27/2023
192.553(a)(1)	At the end of each incremental increase, the pressure must be held constant while the entire...	JS23-013	3/27/2023
192.479(a)	Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the...	JS23-013	3/27/2023
192.181(b)	Each regulator station controlling the flow or pressure of gas in a distribution system must have...	JS23-013	3/27/2023
192.721(b)(1)	Mains in places or on structures where anticipated physical movement or external loading could...	JS23-013	3/27/2023
192.481(a)	Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere...	JS23-013	3/27/2023
192.467(c)	Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically...	JS23-013	3/27/2023
192.553(b)	Records. Each operator who uprates a segment of pipeline shall retain for the life of the segment...	JS23-013	3/27/2023
192.553(d)	Limitation on increase in maximum allowable operating pressure. Except as provided in §192.555(c)...	JS23-013	3/27/2023
192.353(a)	Each meter and service regulator, whether inside or outside a building, must be installed in	JS23-013	3/27/2023
192.727(d)	Whenever service to a customer is discontinued, one of the following must be complied with:	JS23-013	3/27/2023

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On March 27, 2023 Pipeline Safety Staff reported to the City of Fort Valley Gas Department (Fort Valley Utility Commission (FVUC)) to perform a comprehensive inspection of Operator's plans, programs and facilities.

During this inspection the City of Fort Valley Gas Department was represented by:
Robert Johns - Operations Manager
Wade Sharpe - MGAG/SRCS (consultant)
Lori Lamberth - MGAG/SRCS (consultant)

Commission Staff was represented by:
Jason Smith - Lead Inspector
Daphne Jones - Pipeline Safety Inspector
Joe Jones - Pipeline Safety Inspector
Daniel Clemmons - Pipeline Safety Inspector

At the time of this inspection the City of Fort Valley Gas Department was under one previously existing probable violation cited under Public Awareness Inspection #AT20-001. This probable violation was address in follow-up inspection #JJ23-008.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that City of Fort Valley Gas Department was in probable violation of the minimum federal safety standards; specifically:

1. 49CFR §192.465 - External Corrosion Control: Monitoring.
   (d) Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.

   STAFF'S COMMENTS: While reviewing cathodic protection monitoring records Staff found that in 2019 the CP contractor recommendations indicated the need to install bond wire on insulated compression coupling at Franklin Blvd & Orange Street. Then in 2021 the CP contractor recommended that FVUC locate & install bond wire on insulated compression coupling at intersection of Franklin Blvd & Hwy 96/Orange Street. Staff asked the Operator if the recommended action had been completed. The Operator stated they had no record of this work being done.

   In addition, Staff found that the Operator had not taken prompt remedial action to address low cathodic protection readings on the service located at Blue Bird @ Taylors Mill Rd and the service located at Hwy 341 N @ Avera Dr. The pipe to soil readings at these locations were below criteria from CY2017 to CY2021.

   PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to take prompt remedial action to correct deficiencies indicated by cathodic protection monitoring.

2. 49CFR §192.467 - External corrosion control: Electrical isolation.
   (c) Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically isolated from metallic casings that are a part of the underground system. However, if isolation is not achieved because it is impractical, other measures must be taken to minimize corrosion of the pipeline inside the casing.

STAFF'S COMMENTS: In the Fort Valley Utility Commission Operations and Maintenance Manual, Section 9H - External Corrosion Control - Electrical Isolation it states:

"(c) Each pipeline will be electrically isolated from metallic casings that are a part of the underground system. However, if isolation is not achieved because it is impractical, other measures, including the examples listed below, will be taken to minimize corrosion of the pipeline inside the casing:.

2) Existing installations Where there is an indication on existing installations that corrosion is occurring on the carrier pipe or where a CP installation is rendered inadequate as a result of low resistance between the casing and carrier pipe, practical measures to help ensure adequate corrosion protection on the pipeline may consist of one or more of the following:

(i) Filling the annular space between the carrier pipe and casing with a non-conductive filler.

(ii) Applying additional CP to the pipe.

(iii) In some cases where the carrier pipe is electrically shorted to the casing, it may be practical to expose the ends of the casing and physically realign the carrier pipe to give enough clearance for inserting electric insulating material in sheet form between the casing and carrier pipe. The feasibility of safely moving the carrier pipe to clear a short should be determined prior to performing the work."

Staff performed field inspections of the Operator's cathodic protection system and found two casings that appear to show electrical isolation has not been achieved. The locations were identified by the Operator as Blue Bird @ Taylors Mill Rd and HWY 341 N @ Avera Dr.

Staff noted that these casings had been identified during periodic surveys during CY2017 - CY2021. The casing reading at Blue Bird Blvd @ Taylors Mill Rd, from 11/2017 = -1.23, 11/2018 = -2.65, 11/2019 = -2.16, 11/2020 = -1.51, 10/2021 = -1.36, and Operator had not received year 2022 survey back at the time of this inspection. The casing reading at HWY 341 N @ Avera Dr, from 11/2017 = -2.37, 11/2018 = -2.88, 10/2019 = -2.75, 11/2020 = -1.54, 10/2021 = -2.03, and Operator had not received year 2022 survey back at the time of this inspection. The Operator could not demonstrate that any of the remedial actions required by their O&M procedures had been taken to address this condition.

PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to ensure that each pipeline is electrically isolated from metallic casings that are a part of their underground system as required by 49CFR, 192.467(c), and their O&M Procedures.

3. 49CFR §192.481 - Atmospheric Corrosion Control: Monitoring.

(a) Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

(1) Onshore other than a Service Line: At least once every 3 calendar years, but with intervals not exceeding 39 months.

(2) Onshore Service Line: At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in paragraph (d) of this section.

STAFF'S COMMENTS: The City of Fort Valley Gas Department has atmospheric corrosion monitoring done in conjunction with their leak survey annually. (***Note:*** according to the Operator

2017 through 2020 Leak Survey equals the entire system. To fall in perimeters of federal guidelines for monitoring for Atmospheric Corrosion; 2017 non-business district should have been completed by at least December 2022.)

While reviewing atmospheric corrosion monitoring records for 2017 through 2022 Staff noticed that 2017 and 2018 did not show the column illustrating a check of atmospheric corrosion was completed. Staff questioned the Operator about this, thinking maybe in 2017 and 2018 atmospheric corrosion monitoring was done independently of their leak survey. The Operator checked but then informed Staff that they have no sort of record to prove that atmospheric corrosion monitoring was performed in 2017 and 2018.

PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to demonstrate that atmospheric corrosion monitoring occurred on their system as required.

4. 49CFR §192.721 - Distribution Systems: Patrolling.
   (b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled -
      (1) In business districts, at intervals not exceeding 4 ½ months, but at least four times each calendar year;

STAFF'S COMMENTS: FVUC's O&M section 13-O – (b) states: "Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage will be patrolled as follows: (1) In business districts, at intervals not exceeding 4 ½ months, but at least four times each calendar year."

While reviewing patrolling records Staff found that in 2021 the Operator patrolled the sections within the business district twice, once in April and once in July. Staff asked FVUC if they knew why their business district sections was only patrolled two times in 2021 the Operator acknowledged missing two patrols.

In 2022 section FVBD-2 Hwy 341 N. Shopping Cntr Area, and section FVBD-4 Hwy 341 S. Area was patrolled on 1/25/2022, 4/28/2022 and 10/21/2022. Section CCBD-11 W. Crusselle St was patrolled on 1/19/2022, 4/28/2022 and 10/20/2022. When questioned about the one missing patrol from sections FVBD-2, FVBD-4 and CCBD-11, the Operator was not able to locate any additional records and acknowledged the missing patrol that should have occurred around July 2022.

PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to demonstrate that they performed patrolling inside their business district four times a calendar year as required.

5. 49CFR §192.181 - Distribution Line Valves.
   (b) Each regulator station controlling the flow or pressure of gas in a distribution system must have a valve installed on the inlet piping at a distance from the regulator station sufficient to permit the operation of the valve during an emergency that might preclude access to the station.

STAFF'S COMMENTS: During this inspection Staff requested a listing of FVUC's regulator stations and their inlet valves. The Operator advised Staff that they have 19 regulator stations, however, four (4) of these stations do not have inlet valves as required by §192.181(b). The Operator could also not demonstrate if these stations were installed pre-code and therefore not subject to the

requirements of §192.181(b). These stations are identified as Cactus Hill, Atlanta Sandpit, Harris Drive, and Golf Course.

PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to ensure that each regulator station controlling the flow or pressure of gas in a distribution system has a valve installed on the inlet piping at a distance from the regulator station sufficient to permit the operation of the valve during an emergency that might preclude access to the station.

6. 49CFR §192.353 - Customer Meters and Regulators: Location.
   (a) Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated. However, the upstream regulator in a series may be buried.

   STAFF'S COMMENTS: During this inspection Staff identified multiple locations where customer meters were in contact with the ground (soil or ground covering), which has the potential of being a corrosive environment. Some of the locations included: 505 Anthoine Street, 806 Knoxville Street, the First Baptist Church @ 209 College Street and 100, 102, 104, 106, 108, 110, 112, 114, 116 & 118 Church Street.

   PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to ensure customer meter sets are installed in a manner that would protect them from corrosion or other damage as required.

7. 49CFR §192.479 atmospheric Corrosion control: General.
   (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

   STAFF'S COMMENTS: During this inspection Staff observed several locations throughout the system (where the lack of proper coating was exposing above ground piping to the potential of atmospheric corrosion) with meter sets in need of maintenance: cleaning and painting/coating.

   Staff inspected meters and piping for atmospheric corrosion in the Fort Valley downtown business district. The meter set located at 505 Anthoine Street was found in need of paint, and the meter at 122 East Main Street was found to have corrosion on riser piping. There was no wrap or protection remaining on the pipe. The Operator's records indicate that during the 2021 and 2022 Leak and Atmospheric Survey there was no atmospheric corrosion found on the pipe. Records indicate that all that was needed was new paint. The meter was painted, but the riser needed to be wrapped and was not fully painted.

   PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to clean and coat their pipeline facilities that are exposed to the atmosphere as required by §192.479.

8. 49CFR §192.727 - Abandonment or deactivation of facilities.
   (d) Whenever service to a customer is discontinued, one of the following must be complied with:
      (1) The valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator.

STAFF'S COMMENTS: In the FVUC's O&M section 13-R Abandonment or Deactivation of Facilities, it states:

(d) Whenever service to a customer is discontinued, one of the following will be complied with:

(1) The valve that is closed to prevent the flow of gas to the customer will be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by For Valley Utility Commission.

(2) A mechanical device or fitting that will prevent the flow of gas will be installed in the service line or in the meter assembly

During this inspection, Staff inspected meters in the Fort Valley downtown business district and found multiple locations where meters were turned off but not locked. Some of the address include 312 Central Ave, 109 Church St, and 113 Church St.

PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to use a locking device or other means that will prevent the opening of the valve by unauthorized persons.

9. 49CFR §192.553 - General requirements.

(a) Pressure increases. Whenever the requirements of this subpart require that an increase in operating pressure be made in increments, the pressure must be increased gradually, at a rate that can be controlled, and in accordance with the following:

(1) At the end of each incremental increase, the pressure must be held constant while the entire segment of the pipeline that is affected is checked for leaks.

STAFF'S COMMENTS: The Operator performed an uprating to the Western Loop system. The Operators uprating plan called for five (5) incremental pressure increases. The Operator provided records which demonstrated that a leak survey was conducted on this system on August 8-9, 2018; This Operator has demonstrated that a leak survey had been conducted prior to the first incremental pressure increase as required by their uprating plan.

The Operator also provided records which indicated that there was a leak survey conducted following each of the six incremental pressure increases from 30 psi to 258psi. The Operator also provided records which indicate that a leak survey was conducted after each incremental pressure increase.

The Operator, however, could not provide any records which demonstrated that the pressure on this pipeline was held constant while the entire segment of the pipeline was checked for leaks, as required by their uprating plan.

PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to demonstrate that they performed the uprating of the Western Loop in accordance with the requirements of 192.553(a)(1) and their uprating plan.

10. 49CFR §192.553 - General requirements.

(b) Records. Each operator who uprates a segment of the pipeline shall retain for the life of the segment a record of each investigation required by this subpart, of all work performed, and of each pressure test conducted, in connection with the uprating.

STAFF'S COMMENTS: The City of Fort Valley Gas Department performed an Uprating of the Western Loop system from 30 psi to 275 psi. During this uprating process, the Operator failed to maintain for the life of the segment a record of each investigation required by this subpart, of all work performed, in connection with the uprating. Specifically, the documentation which demonstrated that the pressure was held constant while the entire segment of the pipeline was checked for leaks, as required by their uprating plan.

Staff also noted that the Operator uprating plan states, in section 6, that: "Records of the investigations, the work, and the testing associated with this Uprating Procedure will be maintained for the life of the facility."

PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to maintain records which demonstrate that the uprating of the Western Loop system was conducted in accordance with Subpart K, and their uprating procedure.

11. §192.553 General requirements.
(d) Limitation on increase in maximum allowable operating pressure. Except as provided in §192.555 (c), a new maximum allowable operating pressure established under this subpart may not exceed the maximum that would be allowed under §§ 192.619 and 192.621 for a new segment of pipeline constructed of the same materials in the same location. However, when uprating a steel pipeline, if any variable necessary to determine the design pressure under the design formula (§192.105) is unknown, the MAOP may be increased as provided in §192.619(a)(1).

STAFF'S COMMENTS: During this inspection Staff reviewed an uprating plan and records for the section of pipeline identified as the "Northwest loop." According to the uprating plan the Northwest Loop is identified as:

4" section - 4.27 miles – existing MAOP of 30 psig
6" Powersville Section – 3.29 miles – existing MAOP of 30 psig
Fieldcrest Section – 2 miles – existing MAOP of 30 psig
Housers Mill Section 1 – 14,707 feet – existing MAOP of 300 psig
Housers Mill Section 2 – 12,707 feet - existing MAOP of 300 psig
Traffic Circle Section – no footage identified – existing MAOP of 300 psig

Documentation provided by the Operator indicated that prior to their uprating the MAOP for all of their pipeline segments was established under §192.619(a)(4); however, the records do not demonstrate that the Operator calculated all of the pressures required under §192.619(a) to make their MAOP determination. In addition, while the Operator did perform a strength test on a piece of the 4" pipe from Avera Drive their records do not demonstrate that all of the 4" pipe in the 4" section is the same pipe. The records also do not indicate that the MAOP 's for the 6" Powersville Section or the Fieldcrest Section were properly established prior to being uprated.

Staff also noted that the Operators uprating plan indicates that all of these segments were constructed between 1988 and 2014, and therefore should have been constructed in accordance with written construction plans as required by §192.303 which should have addressed testing requirements and records retention.

PROBABLE VIOLATION: The City of Fort Valley Gas Department failed to demonstrate that their uprating complies with the requirements of 49 CFR, Part 192, Subpart K.

PROPOSED CIVIL PENALTY

Under Commission Rule 515-9-1.01, by virtue of the authority vested in the Commission by law and pursuant to orders issued by the Commission on May 4, 1967, July 6, 1967, April 23, 1968, and October 29, 1970, all Rules and Regulations prescribed by the United States Department of Transportation applicable to the "Transportation of Natural and Other Gas by Pipeline: Minimum Safety Standards" (C.F.R. 49, Parts 191 and 192) are by this Rule made the Rules and Regulations of the Georgia Public Service Commission for the safe installation and operation of all natural gas transmission and distribution facilities by companies subject to the jurisdiction of the Commission within this State.

Under Commission Rule 515-9-3-.08 (Written Formal Notice of Violation), the Commission may propose a civil penalty in conjunction with this notice of probable violation. Further, the City of Fort Vallet Gas Department is subject to civil penalties under O.C.G.A. § 46-2-91(b) which states that: Any operator which violates any rule or regulation of the commission prescribed pursuant to subsection (i) of Code Section 46-2-20, or which fails, neglects, or refuses to comply with any order after notice thereof, shall be liable to a penalty not to exceed the maximum penalties provided for in 49 C.F.R. Section 190.223.

Staff has reviewed the circumstances surrounding the probable violations cited in this report and has recommended the civil penalty/penalties listed below. Please note that this recommended amount is less than the amount authorized by Georgia law.

Item #	Code / Rule	Description	Proposed Penalty
1	§192.465(d)	External Corrosion Control: Monitoring	$5,000.00
3	§192.481(a)	Atmospheric Corrosion Control: Monitoring	$5,000.00
TOTAL PROPOSED PENALTY			$10,000.00

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 Fort Valley

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37054

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:	)	
	)	
Probable Violation(s) Report with	)	**DOCKET NO. 37054**
Proposed Civil Penalty	)	
Fort Valley Utility Commission	)	
Inspection JS23-013 on March 27, 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 *Fort Valley Utility Commission* 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

*Clay Walker, General Manager
Fort Valley Utility Commission
P.O. Box 1529
Fort Valley, GA 31030
cwalker@fvutil.com

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

Respectfully Submitted this 26th day of March 2024:

Cathy Nesbitt

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