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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. 37024

DOCKET# 37024
DOCUMENT# 219969

AGL - Operations and Engineering
Ten Peachtree Place, NE Suite 1000
Location 1365
Atlanta, GA 30309

REF: Incident Inspection # JH24-003

☐ Certified Mail ☐ Regular Mail

Attention: Mr. Pedro Cherry

On January 3, 2024, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an investigation of a reported incident involving your natural gas system. The enclosed inspection report numbered JH24-003 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 note that unless specifically addressed in the attached report, any previously existing probable violations were not addressed during this investigation, and no response is required for those items.

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. 37024 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: JH24-003

OPERATOR: AGL - Peachtree

INVESTIGATOR: Jack Hewitt

INSPECTION DATE: January 3, 2024 REPORT MAILED DATE: September 17, 2024

Any questions concerning this report may be directed to the above address or by telephoning (404) 463-6526.

### 1. PURPOSE OF INSPECTION

To perform an investigation of a reported incident.

2. CONTINUING VIOLATIONS

| Violation | Description | Inspection# | Date |
|---|---|---|---|
| 192.605(a) | Each operator shall prepare and follow for each pipeline, a manual of written procedures for... | AT21-001 | 1/4/2021 |
| 199.105(c)(2) | Post-accident testing; If a test required by this section is not administered within the... | AT21-001 | 1/4/2021 |
| 199.225(a)(1) | Post-accident; As soon as practicable following an accident, the Company must test each surviving... | AT21-001 | 1/4/2021 |

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On November 9, 2023, at 7:10 PM GPSC Staff received notice of an incident that occurred at the new round-a-bout at the intersection of Northside Dr., Riverview Rd., and Old Powers Ferry Rd. in the City of Sandy Springs, GA. The notification came from the Kevin Gordon Supt. Resource Management for Atlanta Gas Light Company (AGLC). Staff was informed that a third-party boring contractor, Washington Communications, drilled into and damaged an AGLC 6-inch steel gas main while directionally boring to install electric conduit lines at the intersection of Northside Drive and Old Powers Ferry Road, Sandy Springs, GA. The City of Sandy Springs is installing a new roundabout at this intersection. The Operator determined the incident was reportable as defined in 49CFR Part 191.5 on Oct. 3, 2017, at 11:09 PM. At that time, the Operator notified the National Response Center and then the Georgia Public Service Commission.

On November 13, 2023, Commission Staff reported to the site of the incident to take pictures and begin the investigation of the incident. On December 21, 2023, Staff reported to the AGLC Peachtree Service Center to continue the investigation of this incident.

During this investigation, the Operator was represented by:
Ralph McCollum – Senior Compliance Engineer
Phil Martin – Operations Foreman

Commission Staff was represented by:
Jack Hewitt - Lead Inspector
Alan Towe – Pipeline Safety Inspector
Glen Murphy – Pipeline Safety Inspector

During this inspection Staff reviewed the Operator's records, and pipeline facilities and interviewed personnel involved with this incident.

As a result of this inspection Staff noted no probable violations of the minimum federal safety standards. However, Staff noted an item of concern regarding the following:

ITEM OF CONCERN

§192.615 Emergency plans.
(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
(6) Taking necessary actions, including but not limited to, emergency shutdown, valve shut-off, or pressure reduction, in any section of the operator's pipeline system, to minimize hazards of released gas to life, property, or the environment.

STAFF COMMENTS: AGLC's procedures for compliance with the requirements of §192.615(a)(6) are in Division 2, Section 22, Item 22.3.9 of their Operations and Procedures Manual. Paragraph c of this section states: "The Company IC [Incident Commander] or operator-qualified Gas Operations personnel shall determine the most expedient way to shut off the flow of gas. Localized emergency valves that segment portions of the main should be considered for use first if they are readily accessible."

During this investigation, Staff found that AGLC could not shut down the gas flow in a timely and prompt manner, taking (8) hours to stop the gas flow.

STAFFS CONCERN: Staff is concerned that AGLC has failed to adequately design their gas distribution system in accordance with the requirements of §192.181(a), which requires that each high-pressure distribution system must have valves spaced so as to reduce the time to shut down a section of main in an emergency. During this incident AGLC had insufficient valves available to shut down this section of main during the emergency, which required them to spend 8 hours excavating through approximately 36 inches of concrete to perform a squeeze-off.

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:** | ) | |
| | ) | |
| **Incident Inspection** | ) | **DOCKET NO. 37024** |
| **Atlanta Gas Light Company** | ) | |
| **Inspection JH24-003 on January 3, 2024** | ) | |
| | ) | |

## 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 *Atlanta Gas Light Company* 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

* Pedro Cherry, President and CEO
Southern Company Gas
Ten Peachtree Place, NE,
Atlanta, GA 30309
ppcherry@southernco.com

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

Respectfully Submitted this 24th day of September 2024:

*Cathy Nesbitt*

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