DOCKET# 56007
DOCUMENT# 221171

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: } DOCKET NO. 56007

STAFF'S FIRST SET OF DATA REQUESTS TO
SOUTHERN COMPANY GAS / ATLANTA GAS LIGHT COMPANY
REGARDING THE REPORTABLE INCIDENT AT 2175 SAVANNAH HIGHWAY
IN JESUP GEORGIA ON APRIL 15, 2024.

FILED
JAN 28 2025
EXECUTIVE SECRETARY
GPSC

TO: PEDRO CHERRY
PRESIDENT AND CEO
ATLANTA GAS LIGHT COMPANY
10 PEACHTREE PLACE NE
ATLANTA, GA 30309

COMES NOW the Georgia Public Service Commission Staff ("Staff") and, pursuant to the authority vested in it by the Georgia Public Service Commission (Commission) pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, "data requests"), to be answered under oath by Southern Company Gas / Atlanta Gas Light Company, ("SCG" "AGLC" or "Company") or its designated representatives. Pursuant to Commission Utility Rule 515-2-1-.04, Staff requests that an original and five (5) copies be filed with the Executive Secretary of the Commission. If there are any **Trade Secret responses**, please provide an original and five (5) copies in accordance with the procedures under Commission Utility Rule 515-3-1-.11. **Accompanied therewith shall be an electronic version of the filing, which shall be made on a CD ROM containing an electronic version of its filing in Microsoft Word® for text documents or Excel® for spreadsheets.**

Please provide responses on or before 4:00 p. m. on Thursday, February 27, 2025.

INSTRUCTIONS

a) These requests shall be deemed to be continuing. The data related to the Positive Response Information System responses shall provided no later than the 7th day of each month for the previous calendar month.

b) All information is to be divulged that is within the knowledge, possession, control, or custody of the Respondent or may be reasonably ascertained thereby.

c) As used herein the "document" included, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, work sheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

Information Request

Docket No. 56007

STAFF'S REQUEST FOR INFORMATION REGARDING THE REPORTABLE INCIDENT AT 2175 SAVANNAH HIGHWAY IN JESUP GEORGIA ON APRIL 15, 2024.

STF 1-1 Please provide the dates that public awareness materials required under 49CFR, §192.616 were provided for 2175 Savannah Highway, Jesup GA, 31545

STF 1-2 Please provide a timeline, by name and job title or function, of each individual who was notified of the death of Brandon Butler between the time the Company was notified at 5:23PM and the time the Commission was notified at 9:37PM on April 15, 2024.

STF 1-3 Please provide a timeline, organized by name and job title or function, of each individual who was notified of Brandon Butler's death on April 15, 2024 between when the time Commission was notified at 9:37PM and when the National Response Center was notified at 10:23PM.

STF 1-4 Please provide a timeline of Brandon Butler's work activity for April 15, 2024.

STF 1-5 Please provide a timeline of Kyle Outler's work activity for April 15, 2024.

STF 1-6 Please provide a timeline of Kyle Outler's work activity for April 15, 2024.

STF 1-7 Please provide the reason why Kyle Outler is no longer with the Company. This can be filed under the Commission's Trade Secret Rule 515-3-.11.

STF 1-8 Kyle Outler is still listed in the excel spreadsheet as an Operations Supervisor on the AGL SharePoint website. Is this the correct spreadsheet?

STF 1-9 Please provide an organizational chart that includes the reporting structure for the AGLC Coastal Region.

STF 1-10 Was Brandon Butler required to submit to any drug or alcohol testing (pre-employment; post-accident; random; reasonable; return-to-duty; or follow-up testing) cause during his employment. If so, what were the results of the testing? This can be filed under the Commission's Trade Secret Rule 515-3-.11.

STF 1-11 In PHMSA Advisory Bulletin ADB-06-01, dated Jan 10, 2005, it states: "Furthermore, PHMSA reminds pipeline operators that although excavation is not explicitly addressed in 49 CFR parts 192 and 195, excavation is considered a covered task under the pipeline operator qualifications regulations (49 CFR 192.801-809 and 195.501-509). These regulations require that pipeline operators

and contractors be qualified to perform pipeline excavation activities. A qualified individual is one who has been evaluated and can perform assigned covered tasks and can recognize and react appropriately to abnormal conditions. In particular, PHMSA recommends pipeline operators review the adequacy of covered tasks involving line locating, one-call notifications, and inspection of excavation activities. Operators should also review the adequacy of required training, evaluation and qualification methods for each of these covered tasks to ensure that each employee and contractor is qualified to perform that task." Does AGLC provide training on excavation activates for Field Specialist A personnel?

STF 1-12 The AGLC Job Description for Field Specialist A states that they are "responsible for making repairs on below ground pipe up to 5/8" in diameter." Please provide any and all training material that is used to train and/or qualify a Field Specialist A for below ground work.

STF 1-13 The AGLC Job Description for Field Specialist A states that they are "responsible for making repairs on below ground pipe up to 5/8" in diameter." When Staff interviewed the Field Specialist A personnel from the Jesup Service Center they were asked if there was a depth maximum that would be required for them to call for assistance. Each of them indicated that when working below ground the decision about repair activities are made at their discretion. Please provide any and all training materials that are used to train the employees in how to determine when to exercise their discretion to either repair a service line, or to call for assistance.

STF 1-14 49CFR, §192.605(b)(9) requires AGLC to have procedures for "Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line." The AGLC OPM does not contain a clear reference to this specific code section. Please list the applicable OPM sections that address the minimum requirements for compliance with §192.605(b)(9) and explain how these procedures were determined to be adequate when Field Specialist A personnel are authorized to enter excavations while alone based on their own discretion.

STF 1-15 Do Field Specialist A technicians have stop work authority when performing work on below ground service lines?

STF 1-16 AGLC updated its Operations and Procedures Manual on December 18, 2024. In this version of the manual Division II, Section 19, Item 19.2.4 – Prevention of Accidental Ignition – Fire Extinguishers, was revised to remove the requirement for the fire extinguisher to be "manned on the up-wind side of the leak or discharge at a distance that provides protection for the user and adequate coverage for repair personnel." Please explain why this change was made.

STF 1-17 In the "What's New in the OPM" section on the AGLC OPM, in Section 9 – OPM Change Log (OPM Tracker) on Page 35, in regard to Section 19.2.4 Preventing

Accidental Ignition – Fire Extinguishers, it advises that the type of change for this section was a Clarification that "Aligned language with Code and Company safety requirements around fire extinguishers." Please advise the specific code section that the removal of the requirement man a fire extinguisher is intended to clarify. Also, please provide a copy of the Company safety requirements around fire extinguishers.

STF 1-18 In the AGLC OPM, in Division II, Section 19, Item 19.1 Hazard Control – Instruction, it states that all appropriate employees shall be instructed in the use of fire extinguishers. Are Field Specialist A personnel considered an appropriate employee under this section?

STF 1-19 AGLC previously advised Staff that Brandon Butler was performing the task of Leak Investigation, and identified this as being found in OPM Division II, Section 4, Item 4.12.1 - Procedure for Leak Investigation – Operator Qualification Requirements. Section 4.12.2 Procedure for Leak Investigation – Safety and Equipment, states that "If a hazardous atmosphere exists (60 percent LEL or greater in a confined space), the following will also apply." In the listed items it identifies a "Harness / Lifeline" and "Respiratory protection." Please advise if all Field Specialist A personnel are provided with these items.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE: **Atlanta Gas Light Company**	)	**DOCKET NO. 56007**

CERTIFICATE OF SERVICE

I hereby certify that the *Staff's First Set of Data Requests* in Docket No. 56007 were filed with the Commission's Executive Secretary and a copy of the 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 United States Mail.

*Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
stanner@psc.ga.gov
via electronic mail

*Michelle Thebert, Facilities Protection Unit Director
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
mthebert@psc.ga.gov
via electronic mail

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

*Joseph Caubo, Manager,
Compliance and QA Regulatory Compliance
Southern Company Gas
Ten Peachtree Place, NE,
Atlanta, GA 30309
JFCAUBO@southernco.com
via electronic mail

*Keimani Harvey, Staff Attorney
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334
kharvey@psc.ga.gov
via electronic mail

Respectfully Submitted this 28th day of January 2025:

Cathy Nesbitt

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