FILED
FEB 11 2025
EXECUTIVE SECRETARY
GPSC

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: } DOCKET NO. 56035

STAFF'S FIRST SET OF DATA REQUESTS TO THE CITY OF MOULTRIE GAS DEPARTMENT REGARDING THE CALIBRATION OF THEIR NATURAL GAS ODORATOR

DOCKET# 56035
DOCUMENT# 221383

TO: PETE DILLARD
CITY MANAGER
CITY OF MOULTRIE
P. O. Box 3368
Moultrie, GA 31776

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 the City of Moultrie Gas Department ("City" "Moultrie" "Operator" 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 February 21, 2025.

INSTRUCTIONS

a) These requests shall be deemed to be continuing.

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.

Docket No. 56035

INFORMATION REQUEST TO THE CITY OF MOULTRIE GAS DEPARTMENT REGARDING THE CALIBRATION OF THEIR EQUIPMENT USED TO PERFORM THE PERIODIC SAMPLING OF COMBUSTIBLE GASES TO ENSURE THE PROPER CONCENTRATION OF ODORANT FOR COMPLAINCE WITH THE MINIMUM FEDERAL STANDARDS IN §192.625(f).

STF 1-1 Please provide a list of any equipment that is owned by the City of Moultrie to conduct periodic sampling of combustible gases for the proper concentration of odorant. This list should include any equipment that has been used since October 13, 2018.

STF 1-2 Please provide a list of any equipment that has been used, but is not owned by the City of Moultrie, to conduct periodic sampling of combustible gases for the proper concentration of odorant. This list should include any equipment that has been in use since October 13, 2018

STF 1-3 Please provide copies of the calibration certificates for any equipment that is owned by the City of Moultrie to conduct periodic sampling of combustible gases for the proper concentration of odorant. This list should include any equipment that has been used since October 13, 2018.

STF 1-4 Please provide any documentation which demonstrates that the City of Moultrie paid for the calibration of the equipment owned by the City of Moultrie to conduct periodic sampling of combustible gases for the proper concentration of odorant. This documentation should cover the time frame of October 18, 2018, through December 31, 2024.

STF 1-5 Please provide any documentation which demonstrates how the City of Moultrie verified the calibration of any equipment that was used, but not owned, by the City of Moultrie to conduct periodic sampling of combustible gases for the proper concentration of odorant. This documentation should cover the time frame of October 13, 2018, through December 31, 2024.

STF 1-6 Please provide a copy of any and all procedures the City of Moultrie Gas Department has used for complying with the requirements of 49CFR, §192.625(f) to conduct periodic sampling of combustible gases for the proper concentration of odorant for the period of October 13, 2018, through December 31, 2024.

STF 1-7 Please provide a listing of all personnel who were employed by the City of Moultrie and qualified to conduct periodic sampling of combustible gases for the proper concentration of odorant for the period of October 13, 2018, through December 31, 2024.

STF 1-8 Please provide a listing of all personnel who were employed by the City of Moultrie and who actually conducted periodic sampling of combustible gases for the proper concentration of odorant for the period of October 13, 2018, through December 31, 2024.

STF 1-9 Please provide a listing of any personnel who were not employed by the City of Moultrie, but who conducted periodic sampling of combustible gases for the proper concentration of odorant for the period of October 13, 2018, through December 31, 2024.

STF 1-10 Please identify the specific person(s), or position with the City of Moultrie Gas Department that is responsible for ensuring that the equipment that is owned by the City of Moultrie to conduct periodic sampling of combustible gases for the proper concentration of odorant is maintained and calibrated as required. This should cover the time period of October 13, 2018, through December 31, 2024.

STF 1-11 Please provide copies of any and all documents to or from the specific person(s), or position identified in STF 1-10 related to the use, operations, or maintenance of the equipment identified in STF 1-1.

STF 1-12 Please provide copies of any and all documents to or from the specific person(s), or position identified in STF 1-10 related to the use, operations, or maintenance of the equipment identified in STF 1-2.

STF 1-13 Please provide copies of any and all documents to or from any person listed in STF 1-8 and STF 1-9 to the specific person, or position identified in STF 1-10 related to the use, operations, or maintenance of the equipment identified in STF 1-1.

STF 1-14 Please provide copies of any and all documents to or from any person listed in STF 1-8 and STF 1-9 to the specific person, or position identified in STF 1-10 related to the use, operations, or maintenance of the equipment identified in STF 1-2.

STF 1-15 Please provide copies of any and all documents to or from any person listed in STF 1-8 and STF 1-9 to any other person or position than the one identified in STF 1-10 related to the use, operations, or maintenance of the equipment identified in STF 1-1.

STF 1-16 Please provide copies of any and all documents to or from any person listed in STF 1-8 and STF 1-9 to any other person or position than the one identified in STF 1-10 related to the use, operations, or maintenance of the equipment identified in STF 1-2.

STF 1-17 Please provide a copy of the records which demonstrate compliance with the requirements of 49CFR, §192.625(f) for the period of October 13, 2018, through December 31, 2024.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN THE MATTER OF:	)	
	)	
City of Moultrie Gas Department	)	**DOCKET NO. 56035**
	)	
	)	
	)	

CERTIFICATE OF SERVICE

I, hereby certify that I have this day served a copy of the within and foregoing document on the following persons via email and/or United States certified/return receipt requested.

*Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

* Pete Dillard, City Manager
City of Moultrie Gas Department
P. O. Box 3368
Moultrie, GA 31776
pete.dillard@moultriega.com

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

Respectfully Submitted this _____ day of February 2025:

Cathy Nesbitt

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

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

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Sent To * Pete Dillard, City Manager
Street, or PO B City of Moultrie Gas Department
P. O. Box 3368
City, State, ZIP+ Moultrie, GA 31776

DN 56035-221383-JS24-023

PS Form 3800, August 2006 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

* Pete Dillard, City Manager
City of Moultrie Gas Department
P. O. Box 3368
Moultrie, GA 31776

DN56035-221383-JS24023

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
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