Atlanta Gas Light

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February 17, 2025

Ms. Michelle Thebert
Director, Facility Protection Section
Georgia Public Service Commission
244 Washington Street, SW
Health Building, Suite 542H
Atlanta, GA 30334-5701

Dear Ms. Thebert:

Please find enclosed Atlanta Gas Light Company's (AGLC) two quarterly reports relating to continuing efforts to reduce the number of third-party damages to our underground facilities in Georgia.

The reports included are as follows:

- *Damage Report Summary*: October - December 2024
- *Quarterly Damage Comparison Report*: October - December 2023 compared to 2024

Report Highlights:

The third-party damage performance metrics during the 4th quarter of 2024 are as follows:

- Damages: 740
- Locates: 193,199
- Damages /1000 Locates: 3.83

The cause of damage per 1000 locates during this quarter are as follows:

- 2.35 damages were due to the Excavator being at fault
    - 0.60 Excavate Without Valid Ticket
    - 0.05 Excavator dug outside area described on ticket
    - 0.08 Excavator dug prior to valid start date/time
    - 0.28 Excavator dug prior to verifying marks by test-hole (pothole)
    - 0.31 Excavator failed to maintain clearance after verifying marks
    - 0.19 Excavator failed to protect/shore/support facilities
    - 0.35 Improper excavation practice not listed above
    - 0.07 Marks faded or not maintained
    - 0.42 Other

- 0.18 damages were due to Excavator – Municipal Error
    - 0.04 Excavate Without Valid Ticket
    - 0.02 Excavator dug outside area described on ticket
    - 0.02 Excavator dug prior to valid start date/time
    - 0.05 Excavator dug prior to verifying marks by test-hole (pothole)

    - 0.03 Excavator failed to maintain clearance after verifying marks
    - 0.01 Excavator failed to protect/shore/support facilities
    - 0.01 Improper excavation practice not listed above

- 1.02 damages were due to Locator Error
    - 0.01 Excavator dug prior to verifying marks by test-hole (pothole)
    - 0.01 Excavator failed to protect/shore/support facilities
    - 0.39 Facility marked inaccurately due to Locator error
    - 0.01 Facility marked inaccurately due to Tracer wire issue
    - 0.07 Facility not marked due to Incomplete marks at damage location
    - 0.37 Facility not marked due to Locator error
    - 0.14 Facility not marked due to No response from operator/contract locator
    - 0.01 Improper excavation practice not listed above
    - 0.02 Other

- 0.13 damages were due to Unknown Damagers
    - 0.07 Excavate Without Valid Ticket
    - 0.01 Excavator failed to maintain clearance after verifying marks
    - 0.01 Excavator failed to protect/shore/support facilities
    - 0.04 Other
    - 0.02 Previous damage

- 0.15 damages were due to AGLC or AGLC Contractor Error
    - 0.01 Excavator dug prior to verifying marks by test-hole (pothole)
    - 0.01 Excavator failed to maintain clearance after verifying marks
    - 0.01 Excavator failed to protect/shore/support facilities
    - 0.02 Facility marked inaccurately due to Incorrect facility records/maps
    - 0.02 Facility not marked due to Abandoned facility
    - 0.04 Facility not marked due to Incorrect facility records/maps
    - 0.01 Facility not marked due to No response from operator/contract locator
    - 0.02 Facility not marked due to Unlocatable Facility
    - 0.02 Improper excavation practice not listed above
    - 0.02 Other

As part of our continuing commitment to damage prevention, AGLC continues to utilize and improve the following processes for the overall damage prevention program. They include the following.

- **Difficult to Locate Assistance:** When locators and contractors encounter problems with locating AGLC facilities, Asset Protection Specialists and Service Centers assist with the locate efforts to ensure damage does not occur. The Company continues to incorporate the Request for Assistance Form available through its internal SharePoint Site. Continued use of the Jameson Gas Line Tracer has proven to be effective. AGLC remains committed to exploring modern technology and alternative methods for locating gas facilities.

- **High Profile Locate Process:** The High Profile Locate process remains in effect. Asset Protection Specialists and ROW Inspectors advise excavators that the scope of the project could include HP or critical facilities. The Specialists and Inspectors then educate the excavators on safe digging practices when working around gas lines. This process helps to raise awareness for excavators in the field.

- **Locator Error: AGLC** continues to work with its locate contractors (USIC & Stake Center Locating) in the areas of Locator at Fault Damages and On-Time Performance. The split of “Large Project” locates requests away from regular production locate requests has allowed for a more concentrated effort to address increased demand in the Large Project arena.



- **Focus on Education and Quality Audits**: The improved root cause analysis and statistically based audit process allows Asset Protection personnel to deliver additional and targeted education and training.
    - Approximately 12,192 excavators and locators were trained on the dig law, etc. through formal and tailgate sessions from October through December 31, 2024.
    - AGL has continued contacting top damagers to schedule educational sessions. This has resulted in numerous safe digging sessions with excavators and locator training that would otherwise not have been possible.

- **Watch and Protect Program**:
    - AGLC continues to utilize the Watch and Protect program (W&P) to identify elevated risk tickets for all excavation work through the use of predictive analytics. AGLC deploys W&P resources to the riskiest of those sites for direct and immediate intervention. While the predictive analytics model continues to learn, AGLC continues to realize the benefits of this approach. In comparison to the 2023 Q3 Combined LP & Production damage ratio of 4.14, the 2024 Q4 Combined LP & Production damage ratio is 3.83. The decrease in damage ratio was due to a mix of factors, including lower statewide ticket volume than anticipated and high excavator damages within the tolerance zone. AGLC's expectation is that, as the model continues to learn, the efficacy of the actionable data will improve.

If you have questions or if I may be of further assistance, please contact me. I can be contacted by telephone on my cell phone - (404) 694-3115.

Sincerely,

Alieu Lette

Alieu Lette
Manager, Asset Protection

Enclosures
CC: Commissioner Tricia Pridemore
Commissioner Tim Echols
Commissioner Lauren McDonald, Jr.
Commissioner Jason Shaw
Commissioner Fitz Johnson

Mr. Pedro Cherry
Mr. Don Carter
Mr. Jim Fletcher
Mr. Rick Lonn
Mr. Tim Brown
Mr. Blake O'Farrow
Mr. Emeka Igwilo

