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DOCKET# 37024
DOCUMENT# 221614

Docket No. 37024

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

REF: DIMP – Implementation Inspection # JB24-009

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Pedro Cherry

On May 15, 2024, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JB24-009 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. 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: JB24-009

OPERATOR: AGL - Operations and Engineering

INVESTIGATOR: Jeff Baggett

INSPECTION DATE: May 15, 2024 REPORT MAILED DATE: February 18, 2025

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

1. PURPOSE OF INSPECTION

To conduct an inspection of the Operators implementation of their Distribution Integrity Management Program (DIMP) for compliance with the minimum federal standards in 49CFR Part 192, SubPart P.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.467	External corrosion control: Electrical isolation.	AT16-048	10/4/2016
192.361(b)	Support and backfill. Each service line must be properly supported on undisturbed or...	AT17-016	4/5/2017
192.463(a)	Each cathodic protection system required by this subpart must provide a level of cathodic…	AT17-027	8/14/2017
192.747(b)	Each operator must take prompt remedial action to correct any valve found inoperable, unless the...	AT17-027	8/14/2017
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	AT17-027	8/14/2017
192.745(b)	Each operator must take prompt remedial action to correct any valve found inoperable, unless...	AT17-027	8/14/2017
192.615(a)(1)	Receiving, identifying, and classifying notices of events which require immediate response by the...	AT17-027	8/14/2017
192.615(a)(11)	Actions required to be taken by a controller during an emergency in accordance with § 192.631.	AT17-027	8/14/2017
192.475(a)	Corrosive gas may not be transported by pipeline, unless the corrosive effect of the gas on the...	AT17-027	8/14/2017
192.1007(e)	Measure performance, monitor results, and evaluate effectiveness.	AT19-031	7/31/2019
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JB21-005	5/1/2021
192.616(c)	The operator must follow the general program recommendations, including baseline and supplemental...	AT21-015	5/11/2021
192.631(b)	Each operator must define the roles and responsibilities of a controller during normal, abnormal...	JB21-022	8/18/2021
192.631(d)(3)	Train controllers and supervisors to recognize the effects of fatigue	JB21-022	8/18/2021
192.631(e)(5)	Monitor the content and volume of general activity being directed to and required of each...	JB21-022	8/18/2021
192.631(h)(6)	Control room team training and exercises that include both controllers and other individuals...	JB21-022	8/18/2021
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT21-030	11/9/2021
192.805(f)	Communicate changes that affect covered tasks to individuals performing those covered tasks	AT21-030	11/9/2021
192.805(g)	Identify those covered tasks and the intervals at which evaluation of the individual's...	AT21-030	11/9/2021
192.805(i)	After December 16, 2004, notify the Administrator or a state agency participating under 49 U.S.C...	AT21-030	11/9/2021

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

ATLANTA GAS LIGHT COMPANY / DIMP IMPLEMENTATION
INSPECTION NUMBER JB24-009 / DOCKET NUMBER 37024

From May 21-22, 2024, Staff reported to the Atlanta Gas Light Company (AGLC) corporate headquarters to perform a Distribution Integrity Management Program (DIMP) Implementation inspection of the Operator's program required under 49CFR, SubPart P.

During this inspection, the Operator was represented by:
Kevin Graham - Director, Distribution Integrity Management Program Analytic Services
Taylor Talkington - Senior Analyst Integrity Management & Analytic Services
Andrew Campbell - Mgr, Compliance Analytics
Chris Jackson - Analyst Sr, Dist Integrity
Daniel Mayer - Analyst Sr, Dist Integrity
Stephanie Graves - Analyst II, Dist Integrity
Rick Slagle - Director Compliance and Quality Assurance
Ralph McCollum - Regulatory Compliance Lead Engineer

Commission Staff was represented by:
Jeff Baggett – Supervisor, Facilities Protection Unit / Lead Inspector
David Lewis – Pipeline Safety Inspector
Brant Sweat – Pipeline Safety Inspector

At the time of this inspection the AGLC - Operations and Engineering was under 20 previously existing probable violations. During this inspection Staff only addressed the violation of §192.1007(e) which was existing from the Operators previous DIMP Implementation inspection. This item is addressed in Follow-up Inspection JB24-010.

ITEM OF CONCERN

As a result of this inspection Staff found no probable violations of the minimum federal safety standards, however, they did note one item of concern:

§192.1007 What are the required elements of an integrity management plan?
(b) Identify threats. The operator must consider the following categories of threats to each gas distribution pipeline: corrosion (including atmospheric corrosion), natural forces, excavation damage, other outside force damage, material or welds, equipment failure, incorrect operations, and other issues that could threaten the integrity of its pipeline. An operator must consider reasonably available information to identify existing and potential threats. Sources of data may include incident and leak history, corrosion control records (including atmospheric corrosion records), continuing surveillance records, patrolling records, maintenance history, and excavation damage experience.

STAFFS COMMENTS: Staff previously found that in August of 2018 AGLC had responded to 15,019 locate tickets with PRIS Code 3N – Unmarked: Late. In subsequent inspections Staff has repeatedly raised their concern about the company's failure to ensure that locates are performed as required. (Ref. Inspection Numbers AT19-009; DL19-004; DL19-013; AT20-014; DL20-030; JB21-005; JH22-001; and DL23-012)

During this inspection (JB24-009) Staff advised AGLC that they had reviewed data from the Utility Protection Center (UPC or GA-811) for locate tickets that AGLC received and the responses that were submitted to the Positive Response Information System (PRIS) for those tickets This review indicated the following normal locate ticket totals for AGLC:

Year	(#) Ticket Count	(#) Late Count	(#) Late 3N	(#) Late 3N Final Response
2021	852,099	4,348	57,086	521
2022	810,109	1,438	69,472	1,833
2023	709,290	25,521	57,114	5,054
Jan – Apr 2024	235,274	1,515	20,577	2,608

Staff also reviewed UPC data for the 4th Quarter of CY2023 which indicated that a significant number of the locate tickets which were initially responded to in PRIS as "3N: Unmarked: Late" are not located for an extended period of time. For example, of the 4,108 tickets which were responded to as 3N, for Oct 2023, 2,190 were ultimately revised to indicate they have been located. However, while 586 were reported as marked and updated in PRIS within 24 hours after the effective date of the ticket, 1,604 tickets were not updated until at least 48 hours after the effective date of the ticket. 605 of those tickets were not located until a period from 8 to 32 days after the effective date of the ticket.

STAFF'S CONCERN: As previously noted in Inspection Number DL19-004 and JB21-005, Staff remains concerned that AGLC's contract locator, USIC, is using the "3N – Unmarked – Late" PRIS code to mask a critical staffing issue. Additionally, Staff is concerned that this issue, which has been noted in multiple inspection reports, has somehow managed to not show up as a potential threat in the Operators DIMP. Staff is also concerned that the number of late unmarked tickets is beginning to cause the excavation community to doubt the effectiveness of the states one-call system and could be a cause for increased damages by excavators who believe they have no choice but to begin excavating when their ticket should have already been located.

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:	)	
	)	
Atlanta Gas Light Company	)	**DOCKET NO. 37024**
	)	
	)	
	)	

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 Mail as follows:

*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 4th day of March 2025:

Cathy Nesbitt

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