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Georgia Public Service Commission

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244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
psc.ga.gov

Docket No. 37024

AGL - Operations and Engineering
Ten Peachtree Place, NE Suite 1000
Location 1365
Atlanta, GA 30309
REF: Follow Up Inspection # JB24-010



Certified Mail

Regular Mail

Email

Attention: Mr. Pedro Cherry

On May 22, 2024, a representative of the Georgia Public Service Commission Pipeline Safety/Facilities Protection Office conducted an on-site inspection of your gas system and found that previously identified probable violation(s) of the Pipeline Safety Regulations have either been cleared or are continuing, as identified below.

- Previously existing probable violation(s) has/have been cleared.
- Previously existing probable violation(s) still exist.
- Additional Enforcement
 - Notice of Proposed Violation
 - Notice of Proposed Violation with Proposed Civil Penalty
 - Warning Letter
 - Letter of Concern
 - Observed Issue
- Consent Agreement Pending

The enclosed inspection report numbered JB24-010 is provided for your information and file.

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 L. Thebert
Director, Office of Pipeline Safety/Facilities Protection

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JB24-010

OPERATOR: AGL - Operations and Engineering

INVESTIGATOR: Jeff Baggett

INSPECTION DATE: May 22, 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 perform a follow-up inspection of the Operators previously existing probable violation from Inspection Number AT19-031

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
192.605(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

Cleared on 5/22/2024

Violation	Description	Inspection#	Date
192.1007(e)	Measure performance, monitor results, and evaluate effectiveness.	AT19-031	7/31/2019

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On May 22, 2024, Staff conducted a follow-up inspection of the Atlanta Gas Light Company’s previously existing probable violations.

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 Atlanta Gas Light Company – Operations and Engineering was under twenty (20) previously existing probable violations. Staff only addressed the previously existing violation of §192.1007(e) which was relevant to Inspection Numbers JB24-008 (DIMP) and JB24-009 (DIMP Implementation)

PROBABLE VIOLATION CLEARED

In regard to the probable violation of 49CFR §192.1007(e) which was cited in Inspection Number AT19-031; In that inspection Staff stated: “Operator failed to document additional measures that have been implemented thru their Asset Protection to mitigate threats and failed to provide documentation as to how the measures will be evaluated for effectiveness.”

OPERATOR RESPONSE: In their response letter to Inspection Number AT19-031, dated February 14, 2020, Atlanta Gas Light Company stated:

“While AGL's Asset Protection program's mitigating measures are documented and reviewed on a frequent basis by the Company, these were not specifically documented within the DIMP Plan and Appendices. As a result, the Company has implemented Company Program Summary Sheets, which document similar information as the Additional or Accelerated (A/A) Action Summary Sheets that were reviewed by Staff during the referenced inspection, including an effectiveness score.

Like the A/A Action Summary Sheets, the Company Program Summary Sheets will be updated yearly and include the following information:

- Company Program Name
- Program Contact & Title
- Documented Plan Threat(s)
- Description of Program
- Overview Metrics
- Program Actions & Performance Measures
- Program Effectiveness

ATLANTA GAS LIGHT COMPANY – OPERATIONS AND ENGINEERING / FOLLOW-UP INSPECTION
INSPECTION NUMBER JB24-010 / DOCKET NUMBER 37024

- o Date of Review(s)
- o Employees Involved
- o Effectiveness Narrative
- o Effectiveness Score

These Company Program Summary Sheets are defined in the DIMP Plan under section 5.B.ii.1: Company Program Summary Sheet. The initial version of the Program Summary Sheets will be released with the 2020 Q2 DIMP Plan update. Additionally, bi-annual (two per year) meetings will be conducted with each referenced Company Program Contact to review the status of the Company Program.”

FOLLOWUP INSPECTION: During this inspection (JB24-010) Staff examined Appendix F and found that Atlanta Gas Light Company has addressed the probable violation of measure performance, monitor results, and evaluate effectiveness, as described in their response letter.

Staff determined that this violation could be cleared at this time.

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

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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