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EXECUTIVE SECRETARY
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REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

(404) 463-6526
(800) 282-5813

244 Washington Street, SW
Atlanta, GA 30334-5701

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

Docket No. 37024

DOCKET# 37024
DOCUMENT# 221632

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

REF: Comprehensive Inspection # JB24-019

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Pedro Cherry

On June 10, 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 JB24-019 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: JB24-019

OPERATOR: AGL - Operations and Engineering

INVESTIGATOR: Jeff Baggett

INSPECTION DATE: June 10, 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 a comprehensive inspection of the Operators plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192 for the NWGA, Newnan, Milledgeville and Vidalia Service Centers

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

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JB24-019	6/10/2024
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	JB24-019	6/10/2024
192.465(a)	Each pipeline that is under cathodic protection must be tested at least once each calendar year...	JB24-019	6/10/2024
192.615(b)(3)	Review employee activities to determine whether the procedures were effectively followed in each...	JB24-019	6/10/2024
192.481(a)	Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere...	JB24-019	6/10/2024

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

ATLANTA GAS LIGHT COMPANY – CORPORATE / SERVICE CENTER COMPREHENSIVE INSPECTION
INSPECTION NUMBER JB24-019 / DOCKET NUMBER 37024

Between June 10 and August 5, 2024, Staff met with representatives from the Atlanta Gas Light Company to review records of operations and maintenance activities in preparation for comprehensive inspections of the Clayton, Conyers, Milledgeville, Newnan, Northwest GA (NWGA / Rome), Valdosta, Vidalia and Waycross Service Center.

From August 12-15, 2024, Staff performed a review of emergency response plans and records, and field evaluations of facilities in the NWGA Rome Service Center. (Bartow, Catoosa, Chattooga, Dade, Floyd, Gordon, Murray, Polk, Walker and Whitfield Counties.) (Ref. Inspection Number JB24-015)

From August 26-29, 2024, Staff performed a review of emergency response plans and records, and field evaluations of facilities in the Newnan Service Center. (Coweta, Fayette and Fulton County) (Ref. Inspection Number JB24-014)

From September 9-12, 2024, Staff performed a review of emergency response plans and records, and field evaluations of facilities in the Milledgeville Service Center. (Baldwin, Johnson, Jones, Washington and Wilkinson County) (Ref. Inspection Number JB24-013)

From September 23-26, 2024, Staff performed a review of emergency response plans and records, and field evaluations of facilities in the Vidalia Service Center. (Bleckley, Dodge, Emmanual, Laurens, Montgomery, Tattnal, Telfair, Toombs, Treutlen, Twiggs, Wheeler, Wilkinson) (Ref. Inspection Number JB24-017)

An exit interview was conducted with local Service Center personnel at the conclusion of each inspection. A final exit interview was conducted with AGLC corporate management on Jan 7, 2025.

During this inspection, the Operator was represented by:
Rick Slagle - Director, Compliance and Quality Assurance
Ralph McCollum - Principal Compliance Engineer
Phil Buchanon – Director, Regional Operations
Paul Leath – Director, Regional Operations
Matt Jordan - Director, Corrosion Control and Design
Nick Kitzmiller - Corrosion Control Manager
David Hawkes - Operations Supervisor
Rex Hall - Operations Supervisor
Dewayne Taylor - Operations Supervisor
Brian Selman - Operations Supervisor
Jimmy Slocum - Operations Supervisor
David Adams – Operations Foreman

Commission Staff was represented by:
Jeff Baggett – Lead Inspector / Supervisor, Facilities Protection Unit
Michelle Thebert – Director, Facilities Protection Unit
Jason Smith – Pipeline Safety Inspector
Daphne Jones – Pipeline Safety Inspector
Jack Hewitt – Pipeline Safety Inspector
Brant Sweat – Pipeline Safety Inspector
Daniel Clemmons – Pipeline Safety Inspector
Eric Atkins – Pipeline Safety Inspector
Glenn Murphy – Pipeline Safety Inspector

WARNING LETTER

As a result of this inspection Staff found that AGLC was in probable violation of the minimum federal safety standards; specifically:

1. §192.465 External corrosion control: Monitoring and remediation.
   (a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.

   a) STAFFS COMMENTS: During the inspection of the NWGA Service Center (Ref. Inspection Number JB24-015) Staff identified an isolated service line serving the Martha Berry Museum in Rome that was previously found to be leaking on May 7, 2019 and was repaired with four (4) leak repair clamps. Staff requested documentation of the previous corrosion inspections for this service as required by §192.465(a) and the Operator was not able to provide any.

      PROBABLE VIOLATION: AGLC failed to demonstrate that they had performed monitoring of the isolated service at the Martha Berry Museum as required by §192.465(a)

   b) STAFFS COMMENTS: During the inspection of the Newnan Service Center (Ref. Inspection Number JB24-014) Staff performed a field review of the Operators facilities. Staff identified several locations where the pipeline facilities appear to be separately protected short sections of main, or isolated services with CP readings below the Operators established criteria. These locations include a short section of Main on Beavers St in Newnan; and isolated services at 102 East Freeman St in Newnan, and 348 and 544 Main St in Palmetto.

      PROBABLE VIOLATION: AGLC failed to demonstrate that each of their pipelines has been tested as required.

   c) STAFFS COMMENTS: During the inspection on the Milledgeville Service Center (Ref. Inspection Number JB24-013) Staff performed a field review of the Operators' facilities and identified facilities that were not being monitored as required:
      - 507 S Wayne St., Milledgeville – isolated service – not on monitoring list – below criteria
      - 130 W Baldwin St, Milledgeville – isolated service – not on monitoring list – below criteria
      - 209 North Ave near Warthen St, Sandersville – not read from 2020 to 2023
      - Test Station at Kaolin Road at TN RR, Sandersville – not read in 2022 and 2023
      - 3444 Sunhill Road, Sandersville – Not read in 2022 and read low in 2023

      PROBABLE VIOLATION: AGLC failed to ensure that all of their pipeline facilities were monitored as required by §192.465(a).

2. §192.465 External corrosion control: Monitoring and remediation.
   (d) Each operator must promptly correct any deficiencies indicated by the inspection and testing required by paragraphs (a) through (c) of this section. For onshore gas transmission pipelines, each

operator must develop a remedial action plan and apply for any necessary permits within 6 months of completing the inspection or testing that identified the deficiency. Remedial action must be completed promptly, but no later than the earliest of the following: prior to the next inspection or test interval required by this section; within 1 year, not to exceed 15 months, of the inspection or test that identified the deficiency; or as soon as practicable, not to exceed 6 months, after obtaining any necessary permits.

STAFFS COMMENTS: In Division II, Section 8, Item 8.1.3 of the Operators OPM is states: "Prompt action shall be taken to correct any deficiencies indicated by these monitoring and inspection procedures. Remediation shall be completed no later than the next required inspection."

a) During the inspection of the Newnan Service Center (Ref. Inspection Number JB24-014) Staff reviewed the Test Points Reads (Audit) file provided for the "WEST GA REGION 178 NEWNAN" CP systems. Staff noted that System ID Code 178-NEWNA-93-RS indicated multiple instances where 18 of the 23 identified test points were below criteria from approximately July 2021 and April 2023. Staff also reviewed the Rectifier Inspections (AUDIT) file and found that the following rectifiers were down at the following times: Palmetto @ Locke St rectifier was down Jan-2019 to Jan 2020; Lunsford Interconnect rectifier was down July 2021 to Jan 2023; Smith Road rectifier was down from Mar 2019 to Oct 2019; Palmetto Tyrone @ Minix Road was down from Sept 2021 to May 2022; International Park rectifier was down 7/15/2021 to 7/3/2022.

   PROBABLE VIOLATION: AGLC failed to take prompt remedial action to correct the deficiencies indicated by their monitoring.

b) During the inspection of the Milledgeville Service Center Staff found locations where deficiencies had been noted during the monitoring required by §192.465(a) but have not been remediated as required.
   - 307 South Smith St., Milledgeville – isolated service - reading low since July 2020
   - 60 Oak Ave, Milledgeville – Isolated Service - reading low since December 2021
   - 3444 Sunhill Road, Sandersville – Not read in 2022 and read low in 2023

   PROBABLE VIOLATION: AGLC failed to take prompt remedial action to correct the deficiencies indicated by their monitoring.

3. §192.481 Atmospheric corrosion control: Monitoring.
   (a) Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:

Pipeline type:	Then the frequency of inspection is:
(1) Onshore other than a Service Line	At least once every 3 calendar years, but with intervals not exceeding 39 months.
(2) Onshore Service Line	At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in paragraph (d) of this section.
(3) Offshore	At least once each calendar year, but with intervals not exceeding 15 months.

a) STAFFS COMMENTS: During the inspection of the NWGA Service Center (Ref. Inspection Number JB24-015) Staff performed a field review of the Operators facilities. Staff found three (3) bridge crossings on Hwy 52 in Spring Place in Murray County, between Hwy 225 and 76, which exhibited signs of atmospheric corrosion. They also identified atmospheric corrosion issues at the residential meter sets at 3031 Maple Ave and 20 E 12th St in Rome; a riser at the Corner of N. Broad & E. Callahan in Rome; and the pressure regulating/reducing station at 284 Worthington Gap Rd. in Walker County. Staff requested records of the inspection required by §192.481(a) for each of these facilities. AGLC could not provide records for the three (3) bridge crossings or the pressure regulating reducing station.

PROBABLE VIOLATION: AGLC failed to demonstrate that they inspected all their pipeline facilities for atmospheric corrosion as required by §192.481(a).

b) STAFFS COMMENTS: During the inspection on the Newnan Service Center (Ref. Inspection Number JB24-014) Staff performed a field review of the Operators facilities. Staff noted that the pipeline at the bridge crossing on Happy Valley Circle at Browns Creek in Newnan exhibited signs of atmospheric corrosion. Staff was advised that this location was not included on the Operators list of locations which had been inspected for atmospheric corrosion.

PROBABLE VIOLATION: AGLC failed to demonstrate that they inspected all their pipeline facilities for atmospheric corrosion as required by §192.481(a).

4. §192.605 Procedural manual for operations, maintenance, and emergencies
   a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

STAFFS COMMENTS: Division III, Section 7, Item 7.7.3 (Electrical Isolation of Metallic Systems – Location) in the AGLC OPM states that: "Insulating fittings will generally be installed at the following locations: 5. Between a supporting structure and gas line at bridge or other above ground crossings."

During the inspection of the NWGA Service Center (Ref. Inspection Number JB24-015) Staff performed a field review of the Operators facilities and found a bridge crossing on Hwy 52 in Murray County, between Hwy 225 and Hwy 76, where the pipeline running under the bridge was in contact with the steel support structure of the bridge.

The Operator advised Staff that they have had a program in effect since approximately 2019 to identify exposed spans of pipe on bridges to evaluate them for compliance. Staff is concerned that AGLC had failed to identify this area where electrical isolation had not been maintained during their normal maintenance activities.

PROBABLE VIOLATION: AGLC failed to ensure that insulating fittings were installed to isolate theie pipeline from a steel support structure as required by the OPM procedures.

NOTICE OF AMENDMENT

1. §192.615 Emergency plans.
   (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency…
   (b) Each operator shall:
   (3) Review employee activities to determine whether the procedures were effectively followed in each emergency.

   STAFFS COMMENTS: Staff found that AGLC's procedure was inadequate because it does not include steps for personnel to follow when reviewing an employee's activities following an emergency to determine whether that employee effectively followed the procedures. During this inspection Staff requested records which demonstrated that employee activities were reviewed following emergencies. Staff found that AGLC's procedure for compliance with the requirements of §192.615(b)(3) is in Division 2, Section 22, Item 22.3.1 of their Operations and Procedures Manual (OPM), but it does not have an actual procedure and simply parrots the code language when it states: "Each service center shall: 3. Review employee activities to determine whether the emergency procedures were effectively followed in each emergency." Staff reviewed records in each of the four (4) service that were inspected and found that only one (1) service center was reviewing each emergency response action.

   Staff also found that the actual process for review of emergencies under §192.615(b)(3) is the same process for the periodic review of completed work required by §192.605(b)(8). Reviews of completed work appear to only occur on work orders in the "Click Reviewer" system when they are flagged by the system as having a "business warning."

   REQUIRED AMENDMENT: AGLC's procedure must be amended or supplemented to include steps guiding the review of the activities of an employee following an emergency as part of the post-emergency review process for the effectiveness review of the emergency procedures used during the emergency.

ITEMS OF CONCERN

1. §192.469 External corrosion control: Test stations.
   Each pipeline under cathodic protection required by this subpart must have sufficient test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection.

   a) STAFFS CONCERN: During the inspection of the NWGA Service Center (Ref. Inspection Number JB24-015) Staff was not able to adequately evaluate the Operators system to determine if there are sufficient test points. PHMSA Enforcement Guidance for §192.469 states that "The operator must have sufficient test stations where data is collected to demonstrate that its entire pipeline is cathodically protected. (A test station is the location designated by the operator on a pipeline or facility, where cathodic protection readings are taken.) Test stations for potential, current, or resistance measurements should be provided at sufficient locations to facilitate cathodic protection testing. Such locations may include, but not be limited to, the following: pipe casing installations, metallic structure crossings, isolating joints, waterway crossings, bridge crossings, valve stations, galvanic anode installations, road crossings, stray-current areas, and rectifier installations…"

      Prior to arriving on-site AGLC provided Staff with a listing of facilities that indicated that the NWGA Service Center is operating 784.5 miles of steel mains and more than 62,000 services (exact number of steel services was not determined) in a 10 county area. Cathodic protection for these

facilities is provided by 70 rectifiers that are that are located in nine (9) of the 10 counties. During this inspection AGLC provided Staff with a "Test Point Reads (Audit)" from their CPDM system. For the NWGA Service Center this report identifies 4 Properties and 621 System ID's in an Excel spreadsheet that is more than 12,000 lines long and cannot be filtered to allow for a high level review of the data. AGLC was also unable to provide a readily accessible map or access to a mapping system that Staff could use to gain a proper perspective as to where cathodic protection facilities and test points are located in reference to the specific pipeline segments that are being monitored in their system. The Operators corrosion personnel can generate some maps to evaluate areas, but the time required to perform an overall system evaluation by this method is not reasonable for either party.

Staff also reviewed the Operators PHMSA 7100 reports for the last five (5) years and found that they have reported 354 corrosion leaks on mains, and 2,293 corrosion leaks on services. Staff reviewed leak repair reports from the Service Center which indicated 29 main and 33 service line corrosion leaks across the last five years, however there was no way to easily compare these leaks reports to the specific pipeline segments to evaluate for potential issues with the Operators corrosion control program.

b) STAFFS CONCERN: During the inspection of the Newnan Service Center (Ref. Inspection Number JB24-014) Staff was not able to adequately evaluate the Operators system to determine if there are sufficient test points. PHMSA Enforcement Guidance for §192.469 states that "The operator must have sufficient test stations where data is collected to demonstrate that its entire pipeline is cathodically protected. (A test station is the location designated by the operator on a pipeline or facility, where cathodic protection readings are taken.) Test stations for potential, current, or resistance measurements should be provided at sufficient locations to facilitate cathodic protection testing. Such locations may include, but not be limited to, the following: pipe casing installations, metallic structure crossings, isolating joints, waterway crossings, bridge crossings, valve stations, galvanic anode installations, road crossings, stray-current areas, and rectifier installations…"

Prior to arriving on-site AGLC provided Staff with a listing of facilities that indicated that the Newnan Service Center is operating 250.4 miles of steel mains and more than 51,000 services (exact number of steel services was not determined) in a 3 county area. Cathodic protection for these facilities is provided by 40 rectifiers that are located across the three (3) counties. During this inspection AGLC provided Staff with a "Test Point Reads (Audit)" from their CPDM system. For the Newnan Service Center this report identifies 1 Property and 137 System ID's in an Excel spreadsheet that is more than 4,000 lines long and cannot be filtered to allow for a high level review of the data. AGLC was also unable to provide a readily accessible map or access to a mapping system that Staff could use to gain a proper perspective as to where cathodic protection facilities and test points are located in reference to the specific pipeline segments that are being monitored in their system. The Operators corrosion personnel can generate some maps to evaluate areas, but the time required to perform an overall system evaluation by this method is not reasonable for either party.

Staff also reviewed the Operators PHMSA 7100 reports for the last five (5) years and found that they have reported 354 corrosion leaks on mains, and 2,293 corrosion leaks on services. Staff reviewed leak repair reports from the Service Center which indicated 29 main and 33 service line corrosion leaks across the last five years, however there was no way to easily compare these leaks reports to the specific pipeline segments to evaluate for potential issues with the Operators corrosion control program.

c) STAFFS CONCERN: During the inspection of the Milledgeville Service Center (Ref. Inspection Number JB24-013) Staff was not able to adequately evaluate the Operators system to determine if there are sufficient test points. PHMSA Enforcement Guidance for §192.469 states that "The operator must have sufficient test stations where data is collected to demonstrate that its entire pipeline is cathodically protected. (A test station is the location designated by the operator on a pipeline or facility, where cathodic protection readings are taken.) Test stations for potential, current, or resistance measurements should be provided at sufficient locations to facilitate cathodic protection testing. Such locations may include, but not be limited to, the following: pipe casing installations, metallic structure crossings, isolating joints, waterway crossings, bridge crossings, valve stations, galvanic anode installations, road crossings, stray-current areas, and rectifier installations…"

Prior to arriving on-site AGLC provided Staff with a listing of facilities that indicated that the Milledgeville Service Center is operating 200.8 miles of steel mains and more than 12,700 services (exact number of steel services was not determined) in a five (5) county area. Cathodic protection for these facilities is provided by 14 rectifiers that are located across four (4) of the five (5) counties. During this inspection AGLC provided Staff with a "Test Point Reads (Audit)" from their CPDM system. For the Milledgeville Service Center this report was a PDF file and an Excel spreadsheet that is more than 3,000 lines long and cannot be filtered to allow for a high level review of the data. AGLC was also unable to provide a readily accessible map or access to a mapping system that Staff could use to gain a proper perspective as to where cathodic protection facilities and test points are located in reference to the specific pipeline segments that are being monitored in their system. The Operators corrosion personnel can generate some maps to evaluate areas, but the time required to perform an overall system evaluation by this method is not reasonable for either party.

d) STAFFS CONCERN: During the inspection of the Vidalia Service Center (Ref. Inspection Number JB24-017) Staff was not able to adequately evaluate the Operators system to determine if there are sufficient test points. PHMSA Enforcement Guidance for §192.469 states that "The operator must have sufficient test stations where data is collected to demonstrate that its entire pipeline is cathodically protected. (A test station is the location designated by the operator on a pipeline or facility, where cathodic protection readings are taken.) Test stations for potential, current, or resistance measurements should be provided at sufficient locations to facilitate cathodic protection testing. Such locations may include, but not be limited to, the following: pipe casing installations, metallic structure crossings, isolating joints, waterway crossings, bridge crossings, valve stations, galvanic anode installations, road crossings, stray-current areas, and rectifier installations…"

Prior to arriving on-site AGLC provided Staff with a listing of facilities that indicated that the Vidalia Service Center is operating 486.6 miles of steel mains and more than 10,833 services (exact number of steel services was not determined) in a 12-county area. Cathodic protection for these facilities is provided by 12 rectifiers that are located across seven (7) of the twelve counties. During this inspection AGLC provided Staff with a "Test Point Reads (Audit)" from their CPDM system. For the Vidalia Service Center this report was a PDF file and an Excel spreadsheet that is more than 1,800 lines long and cannot be filtered to allow for a high level review of the data. AGLC was also unable to provide a readily accessible map or access to a mapping system that Staff could use to gain a proper perspective as to where cathodic protection facilities and test points are located in reference to the specific pipeline segments that are being monitored in their system. The Operators corrosion personnel can generate some maps to evaluate areas, but the time required to perform an overall system evaluation by this method is not reasonable for either party.

2. §192.479 Atmospheric corrosion control; General.
   (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.
   (b) Coating material must be suitable for the prevention of atmospheric corrosion.

   STAFFS CONCERN: During this inspection Staff observed atmospheric corrosion on the Operators' facilities at the following locations
   - The Operators aboveground station located in Tyrone.
   - Four (4) services on Railroad Ave in Sargeant.
   - Meters on header at Shenandoah Plaza on Bullsboro Dr in Newnan.

3. §192.491 Corrosion control records.
   (a) Each operator shall maintain records or maps to show the location of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system. Records or maps showing a stated number of anodes, installed in a stated manner or spacing, need not show specific distances to each buried anode.
   (b) Each record or map required by paragraph (a) of this section must be retained for as long as the pipeline remains in service.
   (c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist…

   STAFFS CONCERN: Between August 12 and September 26, 2024 Staff conducted comprehensive inspection of the four (4) service centers identified above.

   During these inspection Staff was not able to perform an adequate review of the Operators cathodic protection (CP) systems. §192.463(a) requires that each cathodic protection system required by this subpart provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part; and §192.491(c) requires each operator to maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist.

   Section 8.2.5 of the AGLC Operations and Procedures Manual addresses "Records for Monitoring Cathodically Protected Systems" and states that these records are to be "recorded on a corrosion control computer system or as appropriate." Staff is aware that Atlanta Gas Light Company utilizes the American Innovations Pipeline Compliance System (PCS) Cathodic Protection Data Manager (CPDM) to maintain records for their CP systems. Staff is also aware that the AGLC DIMP program identifies CPDM as the application used by the Corrosion Department for the purposes of CP compliance management.

   - In previous inspections AGLC has provided Staff with the CPDM Exceptions Report for the service center systems being audited. This report includes survey data and other related information only for facilities that fail to meet certain criteria and is useful in allowing Staff to identify systems with issues that should be reviewed further for compliance. AGLC would not provide this report for this audit. According to the CPDM users guide the software also includes reports for "Compliance" and "Delinquency," and states that "Compliance reports are a key report typically used for auditing purposes." AGLC refused to provide these reports.

   - Prior to the inspection of the Newnan Service Center Staff requested to review the corrosion map that is referenced in the OPM. (Div II, Sec 8, Item 8.26. AGLC responded and stated that: "this

language was placed in the OPM back when AGL had bare steel and cast iron where the Company does not readily maintain the identified corrosion leak maps any longer as identified in Division II Section 8.26 in the OPM. For this reason, Division II, Section 8.26 will be revised accordingly. With the implementation of DIMP, corrosion leaks are tracked and maintained for Risk through the Company's DIMP team where maps can be produced upon request if needed, however, systemic issues can readily be determined from a simple spreadsheet and pivots now since the number of corrosion leaks being repaired are rather small as shown below. I've added these spreadsheets to the individual service center folders underneath the Leak Repairs subfolders for your review.)" Staff also requested copies of the CPDM Compliance Report, Delinquency Report, Exceptions Report, and Test Point Reads Report for the Newnan Service Center. AGLC only provided the Test Points Reads Report.

- Prior to arriving on-site at each service center AGLC provided Staff with a listing of facilities that indicated that:

    - The NWGA Service Center is operating 784.5 miles of steel mains and more than 62,000 services (exact number of steel services was not determined) in a 10 county area. Cathodic protection for these facilities is provided by 70 rectifiers that are that are located in nine (9) of the 10 counties. During this inspection AGLC provided Staff with a "Test Point Reads (Audit)" from their CPDM system. For the NWGA Service Center this report identifies 4 Properties and 621 System ID's in an Excel spreadsheet that is more than 12,000 lines long and cannot be filtered to allow for a high level review of the data.

    - The Newnan Service Center is operating 250.4 miles of steel mains and more than 51,000 services (exact number of steel services was not determined) in a 3 county area. Cathodic protection for these facilities is provided by 40 rectifiers that are that are located across the three (3) counties. During this inspection AGLC provided Staff with a "Test Point Reads (Audit)" from their CPDM system. For the Newnan Service Center this report identifies 1 Property and 137 System ID's in an Excel spreadsheet that is more than 4,000 lines long and cannot be filtered to allow for a high level review of the data.

    - The Milledgeville Service Center is operating 200.8 miles of steel mains and more than 12,700 services (exact number of steel services was not determined) in a five (5) county area. Cathodic protection for these facilities is provided by 14 rectifiers that are located across four (4) of the five (5) counties. During this inspection AGLC provided Staff with a "Test Point Reads (Audit)" from their CPDM system. For the Milledgeville Service Center this report was a PDF file and an Excel spreadsheet that is more than 3,000 lines long and cannot be filtered to allow for a high level review of the data.

- AGLC was also unable to provide a readily accessible map or access to a mapping system that Staff could use to gain a proper perspective as to where cathodic protection facilities and test points are located in reference to the specific pipeline segments that are being monitored in their system. The Operators corrosion personnel can generate some maps to evaluate areas, but the time required to perform an overall system evaluation by this method is not reasonable for either party.

Staff believes that the CP records provided by AGLC, combined with the time and personnel available for this audit did not allow them to properly evaluate the CP systems in the Newnan Service Center area for compliance with the requirements of SubPart I.

4. §192.615 Emergency plans.

(b) Each operator shall:
(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

STAFF COMMENTS: In Division III, Section 22, Item 2.3.1 Item number 6 of the Operators Procedures manual it states that: (6) The Emergency Manual, when not in use, should be kept in the office or other secure location safe where it will not be available to unauthorized persons. Key company employees will be supplied copies of appropriate parts of the manual in accordance with an approved book distribution, and they are expected to be familiar with the emergency procedures.

STAFFS CONCERN: In the AGLC Milledgeville Service Center inspection Staff expressed their concern regarding training of the service center specific Emergency Manual. Although AGLC-Milledgeville claims and documents employees training of the Emergency Procedures that is done in their Riverdale Training Center, the Emergency Manual is site specific to each service center and contains the specific information pertaining to that service center. AGLC-Milledgeville states in their OPM that "key employees will be supplied copies of appropriate parts of the manual", and Staff is concerned that the generic training on procedures is missing the specifics of the service center.

During this inspection the Operator was unable to provide documentation which demonstrates that they are training their employees according to the requirements of §192.615(b)(2).

OBSERVED ISSUES

1. §192.467 External corrosion control: Electrical isolation.
   (a) Each buried or submerged pipeline must be electrically isolated from other underground metallic structures, unless the pipeline and the other structures are electrically interconnected and cathodically protected as a single unit.
   (d) Inspection and electrical tests must be made to assure that electrical isolation is adequate.

   STAFFS OBSERVATION: Staff is aware that AGLC has been conducting a remediation program (scheduled to conclude on July 1, 2025) to address 711 casings that were identified as having issues. (Ref. AGLC Response to Inspection Number AT16-046, AT16-048, JL17-015 and JL17-017; dated May 23, 2018) During this inspection Staff reviewed records which indicated that all of the casings in the Newnan Service Center territory may not be or may not yet have been determined to be electrically isolated. Due to the Operators on-going remediation program, and the time required to inspect this issue with the records that were made available, Staff elected not to inspect this requirement at this time.

2. §192.603 General provisions
   (b) Each operator shall keep records necessary to administer the procedures established under §192.605.

   STAFFS OBSERVATION: During this inspection Staff reviewed leak survey records at each service center for CY's 2019-2023. Staff found that there were inconsistencies in the documentation in the front of the leak survey map books. The signature sheets have guidance that calls for the leak survey technician and a service center employee to annotate when a map is completed, but there were multiple instances of missing signatures. This resulted in some survey maps appearing to indicate that the area had not been surveyed. When following up with the service center personnel Staff found that these area were on the boundary with another Service Center territory and the area had been leak surveyed through them.

3. §192.707 Line markers for mains and transmission lines.
   (a) Buried pipelines. Except as provided in paragraph (b) of this section, a line marker must be placed and maintained as close as practical over each buried main and transmission line:
   (1) At each crossing of a public road and railroad; and

   STAFFS OBSERVATION: During the inspection of the NWGA Service Center (Ref. Inspection Number JB24-015) Staff observed that some of the Operators pipeline crossings with railroads only had markers one side of the railway. Staff notes that there have been issues in Georgia with trains, including at least one derailment that damaged a gas main. Staff believes that markers on both sides of the tracks could provide an increased level of safety for the public and the Operator if there were an issue with a pipeline crossing being blocked by a train where the public could not see a marker.

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.

OPERATOR RESPONSE FORM

Operator Name: ATLANTA GAS LIGHT COMPANY

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37024

Responses required within **30 days of electronic mail.** Provide the following information for this report:

Response to Inspection Number:_____

Type of Enforcement Action(s) cited in report:			Informal Conference Requested	
☐ Notice of Probable Violation (NOPV)	☐ New	☐Continuing	☐ Yes	☐ No
☐ Notice of Amendment (NOA)	☐ New	☐Continuing	☐ Yes	☐ No
☐ Warning Letter	☐ New	☐Continuing	☐ Yes	☐ No
☐ Letter of Concern	☐ New	☐Continuing	☐ Yes	☐ No
☐ Observed Issue	☐ New	☐Continuing	☐ Yes	☐ No
☐ Proposed Civil Penalty	$_____ PCP $ Amount (Total for report)			

Indicate below (A-E) based on the type of Enforcement Actions in this report: (Check all that apply)
Complete a separate copy of Page 2, Operator Response to Enforcement Action, for each cited item.

A. Response for **Notice of Probable Violation** (with and without proposed civil penalty):
   1. ☐ Written statement indicating that corrective measures have achieved Compliance or
   2. ☐ Written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated.

B. Response for **NOA**:
   1. ☐ Contested: Attach written explanation, information, or other material in answer to the allegations in the Notice of Amendment stating your reasons for objecting to the NOA, in whole or in part; or
   2. ☐ Not Contested: Explanation, information, or other material believed to warrant modification of the NOA in whole or in part; or
   3. ☐ Written request for clarification. (Attached)

C. Response for **Continuing** and/or **Existing** violations:
   Current status, updates, expected completion dates, proposed modifications, etc., of the continuing and/or existing violations, even if this information was previously provided. Referencing a previously filed response letter, as status, updates, etc. alone is not sufficient for this response. Failure to provide this information may result in formal interrogatories from the Director through data requests.

D. Response for ☐ **Letter of Concern** / ☐ **Warning Letter**
   I acknowledge receipt of the Letter of Concern/Warning Letter:_____
   SIGNATURE / TITLE

   Additional Comments: (Optional)_____
   _____
   _____

E. Response for **Observed Issue** and **No Violation**: (Optional Response)
   Staff requests that the Operator acknowledge receipt of the Observed Issue/No Violation in writing, or by submitting an email to the FPU Director

Operator Response to Enforcement Action

Enforcement Action for:_____ ☐ New Violation ☐ Continuing Violation

Enter Code / Commission Rule (Complete a separate attachment for each enforcement action)

Enforcement Action(s) cited in report:	Conference Requested:	
☐ Notice of Probable Violation (NOPV)	☐ Yes ☐ No	$_____
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	Proposed Penalty for this violation
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE: _____

_____

_____

_____

_____

_____

_____

_____

Response Provided by: _____ Date:_____

Name / Title

Internal use only:

Lead Inspector: _____ Date Response Reviewed:_____

Actions Acceptable: ☐ Yes ☐No Re-inspection Needed:☐ Yes ☐ No Clear Violation:☐ Yes ☐ No

_____

Supervisor Review by:_____ Date Reviewed:_____

Additional Enforcement Recommended: ☐ Yes ☐ No

_____

Director Review

Approved: ☐ Yes ☐No Schedule Special Follow-up Inspection: ☐ Yes ☐ No

Cleared Violation: ☐ Yes ☐ No

Comments:_____

_____

Filings:
For all written responses or any other official correspondence, the Operator shall file the response at the following address:

Ms. Sallie Tanner, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334

The Operator must file **five (5)** copies of any response and/or official correspondence, as well as a CD with an electronic version of the response in Microsoft Word and/or a PDF, if applicable.

Informal Conference:
Any Operator who chooses to request an informal conference shall request such a conference through emailing the Director (michellet@psc.state.ga.us), calling the Director (404-463-2765), or selecting the "Request Conference" choice.

Civil Penalty Payments:
Certified check for the full amount of the recommended civil penalty or consent agreement amount made payable to the Georgia Public Service Commission. The Operator's name, applicable Docket No., and Inspection Report No. must be included on the certified check. Mail payment to:

Ms. Michelle Thebert, Director, Facilities Protection Unit
Georgia Public Service Commission
244 Washington Street
Atlanta, Georgia 30334

Hearing Requests:
The Operator has the right to request a hearing before the full Commission to contest the alleged probable violations, recommended civil penalties, and all other proposed actions of enforcement. A request for a hearing must be submitted in writing and in accordance with Commission Rule 515-2-1-.04. The Operator must include a statement of the issues that you intend to raise at the hearing. The issues may relate to the allegations, new information, proposed compliance order, proposed civil penalty, or any other recommendation for enforcement action. Please refer to Commission Rule 515-9-3-.11 and O.C.G.A. § 46-2-91 for assessment considerations upon which civil penalties are based. An operator's failure to specify an issue may result in a waiver of the right to raise that issue at hearing. The request must also indicate whether or not the Operator will be represented by counsel at the hearing.

Open Records and Trade Secret Filings:
The Operator is advised that any material provided to the Commission, and all materials prepared by the Commission, including the Notice of Probable Violations and any Orders issued in this case, may be considered public information and subject to disclosure under the Georgia Open Records Act (O.C.G.A. § 50-18-70 et seq.). If you believe that any portion of your response material is security sensitive, privileged, confidential or may cause your company competitive disadvantages and would qualify for protection under the Commission's "Trade Secret Rule" (Commission Rule 515-3-1-.11), you must, along with the complete original document clearly marked "TRADE SECRET" on each page, provide a second copy of the document with the portions you believe qualify for trade secret treatment redacted, and an explanation of why you believe the redacted information qualifies for such trade secret treatment. Should the Commission receive a request for disclosure of any "TRADE SECRET" material, you will be notified, if after review, the materials and your provided justification are deemed not to meet any exemptions provided in the Georgia Open Records Act. You may appeal the Commission's decision to release material at that time. Your appeal will stay the release of those materials until a final decision is made.

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