Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-1 **Please provide the dates that public awareness materials required under 49 CFR §192.616 were provided for 2175 Savannah Highway, Jesup GA, 31545.**

RESPONSE:

A third-party contractor sent out the public awareness materials on behalf of Atlanta Gas Light Company ("AGL") in both 2023 and 2024. The public awareness materials, as well as the third-party contractor invoices, have been provided on the secure Southern Company Gas SharePoint site in the folder labeled STF 1-1.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-2 **Please provide a timeline, by name and job title or function, of each individual who was notified of the death of Brandon Butler between the time the Company was notified at 5:23PM and the time the Commission was notified at 9:37PM on April 15, 2024.**

RESPONSE:

For clarification, at approximately 5:23 p.m., Wayne County 911 notified AGL that an employee was unresponsive and not breathing and that gas was leaking from a hole the employee dug. However, Brandon Butler was not declared dead until 6:05 p.m. (per the death certificate). AGL Regional Director Craig McGalliard was made aware of Brandon's death by the Deputy Coroner. AGL does not track the information requested in STF 1-2, but upon information and belief, the following additional individuals were made aware of Brandon's death prior to 9:37 p.m.:

- James (Kyle) Outler; Supervisor, Operations (former employee)
- Rick Slagle; Manager, Compliance & QA (now retired)
- Chuck Hart; Staff, Investigator
- Charlie Mangan; Director, Corporate Security
- Dean Marianos; Vice President, Operations
- Pedro Cherry; Executive Vice President, President & CEO of AGL and Chattanooga Gas Company
- James Y. (Jim) Kerr II; Chairman, President & CEO of Southern Company Gas
- Jean Harrison; Director, Corporate Safety
- Nick Slappy, Vice President, Safety & Resource Management
- Jody Brown; Supervisor, Operations
- AGL attorneys

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-3 **Please provide a timeline, organized by name and job title or function, of each individual who was notified of Brandon Butler's death on April 15, 2024, between when the time Commission was notified at 9:37PM and when the National Response Center was notified at 10:23PM.**

RESPONSE:

See response to STF 1-2. None known.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-4 **Please provide a timeline of Brandon Butler's work activity for April 15, 2024.**

RESPONSE:

Below is a timeline of Brandon Butler's work activity for April 15, 2024.

- Onsite 9:09am: 1201 S 1st Street, Jesup, GA 31545 – Turn-off
- Onsite 9:47am: 3163 Nine Run Road, Screven, GA 31560 – Turn-off
- Onsite 10:32am: 1120 S Palm Street, Jesup, GA 31546 – Turn-off
- Onsite 10:57am: 124 S Broad Street, Jesup, GA 31546 – Turn-off
- Onsite 11:28am: 495 Railroad Avenue, Jesup, GA 31546 - Turn-off
- Onsite 12:20pm: 118 N McDonald Street, Ludowici, GA 31316 - Outside Investigate
- 2:21pm (enroute): 2175 Savannah Highway, Jesup, GA 31545 - Outside Investigate
- 6:43pm: work order for 2175 Savannah Highway, Jesup, GA was suspended and AGL Field Specialist A Connor Branch completed the order

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-5 **Please provide a timeline of Kyle Outler's work activity for April 15, 2024.**

RESPONSE:

Supervisors' work activities are not tracked. However, AGL is aware that former Operations Supervisor Kyle Outler was in Savannah the afternoon of April 15, 2024, in preparation for attending the annual Chatham County Hurricane Conference (hurricane preparedness) that was scheduled to take place the following morning.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-6: Please provide a timeline of Kyle Outler's work activity for April 15, 2024.

RESPONSE:

See response to STF 1-5.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-7: **Please provide the reason why Kyle Outler is no longer with the Company. This can be filed under the Commission's Trade Secret Rule 515-3-.11.**

RESPONSE:

CONFIDENTIAL & FILED UNDER SEAL UNDER COMMISSION RULE 515-3-1-.11
Exempt from public disclosure under O.C.G.A. § 50-18-72(a)(4)

[redacted]

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-8: **Kyle Outler is still listed in the excel spreadsheet as an Operations Supervisor on the AGL SharePoint website. Is this the correct spreadsheet?**

RESPONSE:

The spreadsheet titled "SEGA – Organization.xlsx" shows the leadership structure of the Southeastern Georgia region as it existed on April 15, 2024. AGL previously provided the excel spreadsheet to Staff on the secure Southern Company Gas SharePoint site under the folder labeled "Staff's Informal Data Requested 071624 and Dec 2024 Meeting Additional Information Requested."

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-9: **Please provide an organizational chart that includes the reporting structure for the AGLC Coastal Region.**

RESPONSE:

AGL has provided an organizational chart on the secure Southern Company Gas SharePoint site in the folder labeled STF 1-9, which is a graphical representation of the AGL Southeast Georgia region as it existed on April 15, 2024.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-10: **Was Brandon Butler required to submit to any drug or alcohol testing (pre-employment; post-accident; random; reasonable; return-to-duty; or follow-up testing) cause during his employment. If so, what were the results of the testing? This can be filed under the Commission's Trade Secret Rule 515-3-.11.**

RESPONSE:

Yes, Brandon Butler was required to submit to drug and alcohol screenings. Records of Brandon Butler's drug and alcohol screenings and the results have been made available on the secure Southern Company Gas SharePoint site in the folder labeled STF 1-10.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-11: **In PHMSA Advisory Bulletin ADB-06-01, dated Jan 10, 2005, it states: "Furthermore, PHMSA reminds pipeline operators that although excavation is not explicitly addressed in 49 CFR parts 192 and 195, excavation isconsidered a covered task under the pipeline operator qualifications regulations (49 CFR 192.801-809 and 195.501-509). These regulations require that pipeline operators and contractors be qualified to perform pipeline excavation activities. A qualified individual is one who has been evaluated and can perform assigned covered tasks and can recognize and react appropriately to abnormal conditions. In particular, PHMSA recommends pipeline operators review the adequacy of covered tasks involving line locating, one-call notifications, and inspection of excavation activities. Operators should also review the adequacy of required training, evaluation and qualification methods for each of these covered tasks to ensure that each employee and contractor is qualified to perform that task." Does AGLC provide training on excavation activities for Field Specialist A personnel?**

RESPONSE:

Yes, AGL does provide training on excavation activities for Field Specialist A personnel. AGL has incorporated the guidance from PHMSA Advisory Bulletin ABD-06-01 into its OQ and training programs for applicable employees. For these employees, work relating to line locating and one-call notifications are covered under OQ044AA "Pipe Locating and Marking (All Conventional Equipment)" and DI0084 "Basic Pipe Locating." Work relating to inspection of excavation activities is covered under OQ004B "Damage Prevention Inspection (Excavation)" and DI0008 "Trenching and Shoring." Brandon Butler's training transcript showed he was up-to-date on his training and OQs for these activities, which is included in the attachment labeled "Brandon Butler Training Transcript.xlsx" and was previously provided on the secure Southern Company Gas SharePoint site under the folder labeled "Staff's Informal Data Requested 071624 and Dec 2024 Meeting Additional Information Requested."

In addition, AGL provides Field Specialist A personnel training on other topics related to excavation. See AGL's response to STF 1-14.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S.

Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-12: **The AGLC Job Description for Field Specialist A states that they are "responsible for making repairs on below ground pipe up to 5/8" in diameter." Please provide any and all training material that is used to train and/or qualify a Field Specialist A for belowground work.**

RESPONSE:

A copy of the relevant belowground training and OQ materials are available on the secure Southern Company Gas SharePoint site in the folders labeled STF 1-11 and STF 1-12.

For clarification, Brandon Butler was responding to an outside odor complaint and was performing leak investigation on April 15, 2024. According to the homeowner, Brandon told him that he had determined the ¾" plug on the outlet of the service riser valve was leaking aboveground. AGL's procedures did not require immediate repair of the riser leak. It is impossible for AGL to know what Brandon Butler was thinking, but because there was no meter at this premises and there was corrosion on the above-ground riser piping, AGL believes Brandon Butler planned to eliminate the above-ground leak by cutting and capping the riser/service line below ground.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-13: **The AGLC Job Description for Field Specialist A states that they are "responsible for making repairs on below ground pipe up to 5/8" in diameter." When Staff interviewed the Field Specialist A personnel from the Jesup Service Center they were asked if there was a depth maximum that would be required for them to call for assistance. Each of them indicated that when working below ground the decision about repair activities are made at their discretion. Please provide any and all training materials that are used to train the employees in how to determine when to exercise their discretion to either repair a service line, or to call for assistance.**

RESPONSE:

AGL provides Field Specialist A personnel training on making repairs on 5/8" plastic service lines, including, for example, when an FSA is not qualified to make the repair because respiratory protection is required or a distribution crew is needed to excavate 20' feet from the blowing gas. Relevant training materials are available on the secure Southern Company Gas SharePoint site in the folders labeled STF 1-11, STF 1-12, and STF 1-13. Please also see AGL's response to STF 1-14.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-14: **49CFR, §192.605(b)(9) requires AGLC to have procedures for "Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and, a rescue harness and line." The AGLC OPM does not contain a clear reference to this specific code section. Please list the applicable OPM sections that address the minimum requirements for compliance with §192.605(b)(9) and explain how these procedures were determined to be adequate when Field Specialist A personnel are authorized to enter excavations while alone based on their own discretion.**

RESPONSE:

The AGL OPM maintains compliance with 49 CFR § 192.605(b)(9) with the content found within OPM Division II, Section 19.3 "Working in Confined Spaces" and its subsections (specifically, OPM Division II, Section 19.3.1 "Working in Confined Spaces – Hazardous Atmosphere" and OPM Division II, Section 19.3.2 "Working in Confined Spaces – Life Protective Equipment"). Additionally, further guidance for taking precautions in a "hazardous atmosphere" can be found in the "Respiratory Protection Program" and the "Excavation Program" found in the Southern Company Gas Safety Compliance Manual (see "105-Respiratory Protection Program.pdf;" Section 105.6.5 "IDLH Atmospheres;" 119-Excavation Program, Section 119.7.6 "Hazardous Atmospheres"). The materials referenced in this response were previously provided on the secure Southern Company Gas SharePoint site under the folder labeled "Staff's Informal Data Requested 071624 and Dec 2024 Meeting Additional Information Requested."

For clarification, no hazardous environment existed when Brandon Butler initially responded to the outside odor complaint at 2175 Savannah Highway on April 15, 2024. Even after the belowground piping was excavated and exposed, there was no leak belowground until Brandon squeezed and cut the belowground riser piping. It was during the work of retiring the riser portion of the service that the conditions changed that resulted in an uncontrolled release of gas.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-15: **Do Field Specialist A technicians have stop work authority when performing work on below ground service lines?**

RESPONSE:

Yes, Field Specialist A technicians have "Stop Work Authority" when performing work on belowground service lines. An example of "Stop Work Authority" communications that are provided to employees is attached hereto as Attachment STF-1-15.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-16: **AGLC updated its Operations and Procedures Manual on December 18, 2024. In this version of the manual Division II, Section 19, Item 19.2.4 - Prevention of Accidental Ignition - Fire Extinguishers, was revised to remove the requirement for the fire extinguisher to be "manned on the up-wind side of the leak or discharge at a distance that provides protection for the user and adequate coverage for repair personnel." Please explain why this change was made.**

RESPONSE:

OPM Division II, Section 19.2.4 "Prevention of Accidental Ignition – Fire Extinguishers" was updated to clarify that this provision does not require a separate employee be solely responsible for manning a fire extinguisher. Jobs, whether performed by a single employee or multiple employees, require that fire extinguishers are appropriately positioned prior to commencing work that may involve the release of natural gas and the potential for gas to ignite, in accordance with 49 CFR § 192.751(a).

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-17: **In the "What's New in the OPM" section on the AGLC OPM, in Section 9-OPM Change Log (OPM Tracker) on Page 35, in regard to Section 19.2.4 Preventing Accidental Ignition -- Fire Extinguishers, it advises that the type of change for this section was a Clarification that "Aligned language with Code and Company safety requirements around fire extinguishers." Please advise the specific code section that the removal of the requirement man a fire extinguisher is intended to clarify. Also, please provide a copy of the Company safety requirements around fire extinguishers.**

RESPONSE:

Please see response to STF 1-16. See Section 111 (Portable Fire Extinguishers) of the Southern Company Gas Safety Compliance Manual. A complete copy of the Southern Company Gas Safety Compliance Manual was previously provided on the secure Southern Company Gas SharePoint site under the folder labeled "Staff's Informal Data Requested 071624 and Dec 2024 Meeting Additional Information Requested."

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-18: **In the AGLC OPM, in Division II, Section 19, Item 19.1 Hazard Control - Instruction, it states that all appropriate employees shall be instructed in the use of fire extinguishers. Are Field Specialist A personnel considered an appropriate employee under this section?**

RESPONSE:

Yes, Field Specialist A vehicles are equipped with a fire extinguisher and Field Specialist A personnel are trained in the use of the fire extinguisher. Please see Butler's training record provided in response to STF 1-11 and training materials provided in response to STF 1-12 that have been provided on the secure Southern Company Gas SharePoint site. See also Sections 110 Fire Prevention Plan Program and 111 Portable Fire Extinguisher Program of the Southern Company Gas Safety Compliance Manual previously provided on the secure Southern Company Gas SharePoint site under the folder labeled "Staff's Informal Data Requested 071624 and Dec 2024 Meeting Additional Information Requested."

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

Atlanta Gas Light Company
Investigation of Incident Located in Jesup, Georgia
Docket No. 56007
Responses to Staff's First Set of Data Requests

STF 1-19: **AGLC previously advised Staff that Brandon Butler was performing the task of Leak Investigation, and identified this as being found in OPM Division II, Section 4, Item 4.12.1 - Procedure for Leak Investigation - Operator Qualification Requirements. Section 4.12.2 Procedure for Leak Investigation - Safety and Equipment, states that "If a hazardous atmosphere exists (60 percent LEL or greater in a confined space), the following will also apply." In the listed items it identifies a "Harness / Lifeline" and "Respiratory protection." Please advise if all Field Specialist A personnel are provided with these items.**

RESPONSE:

No, Field Specialist A vehicles are not equipped with a harness/lifeline type of equipment. For respiratory protection, Field Specialist A vehicles are only equipped with an N95 mask; however, they are not equipped with self-contained breathing apparatus (SCBA) type of equipment. Field Specialist A personnel are trained not to enter "immediately dangerous to life and health" (IDLH) or oxygen-deficient atmospheres. Using the training referenced in AGL's response to STF 1-13, Field Specialist A employees would be expected to retire the service in an excavation away from the IDLH environment, if possible. In the event it is not possible, a Field Specialist A employee must request additional resources if work must be performed in an IDLH or oxygen-deficient atmosphere, in accordance with the guidance provided in response to STF 1-14.

For clarification, no hazardous environment existed when Brandon Butler initially responded to the outside odor complaint at 2175 Savannah Highway on April 15, 2024. Even after the belowground piping was excavated and exposed, there was no leak belowground until Brandon squeezed and cut the belowground riser piping. It was during the work of retiring the riser portion of the service that the conditions changed that resulted in an uncontrolled release of gas.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Robert S. Highsmith Jr., Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.