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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. 37093

DOCKET# 37093
DOCUMENT# 221691

Tri-County Natural Gas Authority
P. O. Box 247
Union Point, GA 30669

REF: Follow Up Inspection # RS24-008

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Lanier Rhodes

On January 29, 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 RS24-008 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. 37093 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

COMMISSIONERS

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: RS24-008

OPERATOR: Tri-County Natural Gas Authority

INVESTIGATOR: Brant Sweat

INSPECTION DATE: January 29, 2024 REPORT MAILED DATE: February 26, 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 follow-up inspection of the Operators previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.619(a)	No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum...	JS18-042	12/17/2018
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	JB22-001	3/7/2022

3. CLEARED VIOLATIONS

Cleared on 1/29/2024

Violation	Description	Inspection#	Date
191.11	Distribution system: Annual report.	JB22-001	3/7/2022
192.747(a)	Each valve, the use of which may be necessary for the safe operation of a distribution system, m...	JB22-001	3/7/2022
192.615(c)	Each operator shall establish and maintain liaison with appropriate fire, police, and other...	JB22-001	3/7/2022
192.723(b)(1)	A leakage survey with leak detector equipment must be conducted in business districts, including...	JB22-001	3/7/2022
192.605(b)(9)	Taking adequate precautions in excavated trenches to protect personnel from the hazards of unsafe...	JB22-001	3/7/2022
192.721(b)	Mains in places or on structures where anticipated physical movement or external loading could...	JB22-001	3/7/2022
192.615(a)(8)	Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and...	JB22-001	3/7/2022
192.455 (e)	Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an...	JB22-001	3/7/2022
192.479(b)	Coating material must be suitable for the prevention of atmospheric corrosion.	JB22-001	3/7/2022
192.615(a)(6)	Emergency shutdown and pressure reduction in any section of the operator's pipeline system neces...	JB22-001	3/7/2022
192.615(a)(4)	The availability of personnel, equipment, tools, and materials, as needed at the scene of an...	JB22-001	3/7/2022

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

TRI-COUNTY NATURAL GAS SYSTEM / FOLLOW-UP INSPECTION
INSPECTION NUMBER RS24-008 / DOCKET NUMBER 37093

On January 31st, 2024, Staff went to Union Point, Georgia and reported to Tri-County Natural Gas System to conduct a follow-up inspection of the Tri-County Natural Gas System's plan.

During this inspection Tri-County Natural Gas was represented by:
Wendall Matthews – Gas Superintendent
Denise Channell - Designated Employer Representative
Lori Lambert - MGAG/SRCS (consultant)

Pipeline Safety Staff was represented by Brant Sweat, Lead Inspector.

At the time of this inspection Tri-County were under 12 previously existing probable violations. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATIONS CLEARED

1. In regard to the Notice of Amendment for 49CFR, §191.11 which was cited in Inspection Number JB22-001; in that inspection Staff stated: "The Tri-County Natural Gas System must amend the annual 7100 reports for The City of Greensboro, The City of Union Point, and the Tri-County Gas systems to correctly identify the lost and unaccounted for gas for each system."

   OPERATOR FIRST RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas will amend the PHMSA Form 7100.1-1 Reports for Greensboro. Union Point. and Tri-County to correctly identify lost and unaccounted-for gas for each system by March 15, 2023, after evaluating data from new measuring equipment recently installed."

   FIRST FOLLOW-UP INSPECTION: During this inspection (RS24-008) Staff noted that the Operator has consolidated all the facilities from Greensboro and Union point into their system and their PHMSA annual report now reflects the totals of all three systems. Staff also reviewed records from the years 2022 and 2023 and it shows that the percentage of Lost and Unaccounted for gas is now within +- 5%.

   Staff determined that this violation could be cleared.

2) In Regard to the Notice of Amendment 49CFR, §192.455(e) which was cited in Inspection Number JB22-001: in that inspection Staff stated: "The Tri-County Natural Gas System must amend their procedures to address the requirements of §192.455(e)."

   OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas has revised its Operations and Maintenance Manual to state that aluminum will not be installed below ground on its gas system."

   FIRST FOLLOW UP INSPECTION: During the follow-up inspection (RS24-008) Staff noted that procedures in the O&M Manual have been amended and are now in order with 192.455(e).

   Staff determined that this violation could be cleared.

3) In Regard to the Notice of Amendment 49CFR, §192.479(b) which was cited in Inspection Number JB22-001: in that inspection Staff stated: "The Tri-County Natural Gas System must amend their procedures to address the requirements of §192.479(b)."

OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas will revise its Procedures to more thoroughly address cleaning and coating pipeline facilities by January 31. 2023."

FIRST FOLLOW UP INSPECTION: Staff determined during the follow-up inspection (RS24-008) that procedures have been revised to more thoroughly address cleaning and coating pipeline facilities by January 31. 2023. 3 different Task have been added in O&M Manual including Task #0991 Coating Application and Repair, Task #1001 Coating Application and Repair – Sprayed, Task #1011 External Coating Application and Repair – Wrapped.

Staff determined that this violation could be cleared

4) In Regard to the Notice of Amendment 49CFR, §192.605(b)(9) which was cited in Inspection Number JB22-001: in that inspection Staff stated: "The Tri-County Natural Gas System must amend their procedures to ensure their personnel are aware of the requirements of both Procedure 05 and Procedure 1321-1341."

   OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas will revise Procedure #05 to reference Procedure 1321- 1341 by January 31. 2023."

   FIRST FOLLOW UP INSPECTION: Staff determined during the Follow-up inspection (RS24-008) that the operator has revised Procedure #05 to reference procedure 1321-1341.

   Staff determined that this violation could be cleared

5) In Regard to the Notice of Amendment 49CFR, §192.615(a)(4) which was cited in Inspection Number JB22-001: in that inspection Staff stated: "Tri-County Natural Gas must amend their procedures to ensure the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency."

   OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas will its Emergency Plan to address the availability of equipment that it would require at the scene of an emergency by January 31, 2023."

   FIRST FOLLOW UP INSPECTION: During this inspection (RS24-008) Staff determined that procedures have been revised and updated to ensure availability or personnel, equipment, tools, and materials as needed at the scene of an emergency. Appendix H-1 has been revised and Vehicle list, Equipment list, and Safety equipment list have been updated.

   Staff determined that this violation could be cleared.

6) In Regard to the Notice of Amendment for 49CFR, §192.615(a)(6) which was cited in Inspection Number JB22-001: in that inspection Staff stated: "The Tri-County Natural Gas System must amend their procedures for emergency shutdown and pressure reduction to provide a procedure for their personnel to follow in the event an emergency shutdown or pressure reduction is required in any section of their system."

OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas will develop a Procedure based on Emergency Plan Appendix L by January 31, 2023."

FIRST FOLLOW UP INSPECTION: During this inspection (RS24-008) Staff determined that the emergency shutdown or pressure reduction was no longer a guidance, but a procedure found in the operators O&M Appendix L. A Procedure based on Emergency Plan Appendix L has been amended.

Staff determined that this violation could be cleared

7) In Regard to the Notice of Amendment for 49CFR, §192.615(a)(6) which was cited in Inspection Number JB22-001: in that inspection Staff stated: "The Tri-County Natural Gas System could not provide records which demonstrated that they have notified the appropriate fire, police, and other public officials of gas pipeline emergencies and coordinated with them both their planned responses and actual responses during an emergency."

   OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas has notified appropriate fire, police, and other appropriate public officials of gas pipeline emergencies and has coordinated with them both planned responses and actual responses during an emergency."

   FIRST FOLLOW UP INSPECTION: During this inspection (RS24-008) Staff determined that the Operators response adequately addresses this violation.

   Staff determined that this violation could be cleared

8) In Regard to the Notice of Amendment 49CFR, §192.615(c) Emergency plans which was cited in Inspection Number JB22-001: in that inspection Staff stated: "The Tri-County Gas System must update Appendix C of their Emergency Plan to identify each of the appropriate public safety answering points, fire departments, police agencies, and other public officials that they are required to establish and maintained liaison with for their four-county operating area. They must also amend their liaison messaging to address their ability in responding to a natural gas emergency."

   OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas will update Appendix C of its Emergency Plan by January 31, 2023."

   FIRST FOLLOW UP INSPECTION: During this inspection (RS24-008) Staff determined that the Operator has updated Appendix C of their emergency plan to identify each of the appropriate public safety answering points, fire departments, police agencies, and other public officials that they are required to establish and maintained liaison with for their four-county operating area.

   Staff determined that this violation could be cleared

9) In Regard to the Notice of Amendment 49CFR, §192.721(b) which was cited in Inspection Number JB22-001, in that inspection Staff stated: "The Tri-County Natural Gas System must amend their

procedure, and the associated Distribution Patrolling Report Form, for compliance with §192.721(b) to identify the areas that their personnel are required to patrol."

OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas has revised its documents to address all areas that must be patrolled."

FIRST FOLLOW-UP INSPECTION: During this inspection (RS24-008) Staff determined that the Operator has revised its documents to address all areas that are being patrolled. Operator provided records showing all areas of the Greensboro District Pipeline Patrol Report.

Staff determined that this violation could be cleared.

10) In Regard to the Notice of Amendment 49CFR, §192.723(b)(1) which was cited in Inspection Number JB22-001; in that inspection Staff stated: "The Tri-County Natural Gas System must amend their procedure for identification of their business district to ensure that those areas are surveyed as required, and to provide for a periodic review of those areas to modify them when required."

OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural gas has revised its records to accurately address Business Districts for annual leakage surveys."

FIRST FOLLOW-UP INSPECTION: During this inspection (RS24-008) Staff determined that the Operator has revised its records to accurately address Business Districts for annual leakage surveys.

Staff determined that this violation could be cleared.

11) In Regard to the Notice of Amendment 49CFR, §192.747(a) which was cited in Inspection Number JB22-001; in that inspection Staff stated: "The Tri-County Natural Gas System must amend their procedures required by §192.747(a) to clearly indicate that each valve, the use of which may be necessary for the safe operation of their distribution system, must be checked to ensure that it is operational during its annual service."

OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas will revise its Procedure for Valve Inspection to require the valve to be operated by January 31. 2023."

FIRST FOLLOW-UP INSPECTION: During this inspection (RS24-008) Staff determined that the Operator has amended their procedures required by §192.747(a) to clearly indicate that each valve, the use of which may be necessary for the safe operation of their distribution system, must be checked to ensure that it is operational during its annual service.

Staff determined that this violation could be cleared.

PROBABLE VIOLATION CONTINUING

1. In regard to the Notice of Amendment 49 CFR, §192.181(a) which was cited in Inspection Number JB22-001; in that inspection Staff stated: "During this inspection the Operator was unable to provide a

process for the placement of distribution line valves in accordance with Part 192.181. Because the Operator could not define where these valves are required Staff could not determine if the Operator could perform an emergency shutdown and/or pressure reduction in any section of their pipeline system if it were necessary to minimize hazards to life or property as required by §192.615(a)(6)."

FIRST OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas has addressed valve placement in its Construction Manual."

FIRST FOLLOW-UP INSPECTION: During this inspection (RS24-008), Staff reviewed the Operators response and the documents provided by the Operator (copy of Construction Manual page 18) and found that their amended procedure contains a list of considerations for the placement of valves, but is not a procedure which tells their employees when or where a valve must be place to ensure that they have complied with the requirements of §192.181(a), or to ensure that they can meet the requirements of §192.615(a)(6). Staff has reviewed the Operators response and the statement provided by the Operator and found that it did NOT adequately addresses this violation.

Staff determined that this violation could not be cleared at this time.

2. Regarding the probable violation of 49CFR §192.619(a) which was cited in Inspection Number JS18-042; in that inspection Staff stated that: "Tri-County Natural Gas did not have complete records to substantiate the established MAOPs."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS 18-042, dated December 17, 2018, Tri-County Natural Gas stated that: "Tri-County has operating records to substantiate the MAOP of its feeder line, as well as the remainder of its facilities."

   FIRST FOLLOW-UP INSPECTION: On February 6, 2019, Staff conducted a DIMP Implementation Inspection (Ref: Inspection Number DJ19-008). In this inspection, Staff stated that: "At the time of this inspection, Tri-County Natural Gas Department was under two existing probable violations discovered on December 17, 2018, under inspection number JS 18-042. The Operator recently received this inspection report and has not had sufficient time to respond to the inspection report. Staff did not address these violations."

   SECOND OPERATOR RESPONSE: In their response letter to Inspection Number DJ19-008, dated June 25, 2019, Tri-County Natural Gas stated that: "Tri-County has operating records to substantiate the MAOP of its feeder line, as well at the remainder of its facilities. Documentation is being sent to the Lead Inspector by email in an effort to clear this Probable Violation."

   SECOND FOLLOW-UP INSPECTION: On February 13, 2019, Staff conducted a Public Awareness Inspection (Ref: Inspection Number LB19-009). In this inspection, Staff stated that: "At the time of this inspection, Tri-County Natural Gas Department was under two existing probable violations discovered on December 17, 2018, under inspection number JS18-042. The Operator recently received this inspection report and did not have sufficient time to respond to the inspection report. Staff did not address these violations."

   THIRD OPERATOR RESPONSE: In their response letter to Inspection Number LB19-009, dated July 2, 2019, Tri-County Natural Gas stated that: "Tri-County has operating records to substantiate the MAOP of its feeder line, as well at the remainder of its facilities. Documentation is being sent to the Lead Inspector by email in an effort to clear this Probable Violation."

THIRD FOLLOW-UP INSPECTION: During this inspection (DJ19-060), Staff reviewed documentation provided by the Operator which shows that the Operator has calculated that the operating pressure of their feeder line is below 20% SMYS; however, this documentation does not demonstrate the maximum allowable operating pressures for this pipeline, or the other Tri-County pipeline, has been determined under§ 192.619.

FOURTH OPERATOR RESPONSE: In their response to Inspection Number DJ19-060, dated April 7, 2020, Tri-County Natural Gas stated: "Tri-County has taken additional steps to review and document the MAOP of its feeder line and other facilities in accordance with § 192.619. This documentation is available for review by Staff."

FOURTH FOLLOWUP INSPECTION: Between March 7 and August 25, 2022, Staff conducted a comprehensive inspection of the Tri-County Natural Gas System's plans, programs and facilities for compliance with the minimum federal safety standards in 49CFR, Parts 192 and 192. (Ref. Inspection Number JB22-001) In that inspection Staff stated: "At the time of this inspection the Tri-County Natural Gas System was under one (1) previously existing probable violation. Staff reviewed this violation with the Operator and due to the fact that they are still consolidating records from each of the systems that are merging Staff elected not to review this violation at this time. Staff notes that this inspection was conducted shortly after the Tri-County Natural Gas System had merged with and acquired the facilities which were previously owned and operated by the City of Greensboro and the City of Union Point natural gas systems."

FIFTH OPERATOR RESPONSE: In their response to Inspection Number JB22-001, dated December 27, 2022, Tri-County Natural Gas stated: "Tri-County Natural Gas has reviewed and documented the MAOP of its feeder line and other facilities in accordance with 192.619. This documentation is available for review by Staff."

FIFTH FOLLOW-UP INSPECTION: On June 15th, 2022, Staff reported to Tri-County Gas Authority to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number RS22-019) In that inspection Staff stated: "At the time of this inspection Tri-County Gas Authority had one (1) previous existing probable violation. This violation was not reviewed at the time of inspection."

SIXTH OPERATOR RESPONSE: In their response to Inspection Number RS22-019, dated April 2, 2021, the Operator stated: "Tri-County has taken additional steps to review and document the MAOP of its feeder line and other facilities in accordance with 192.619. This documentation is available for review by Staff."

SIXTH FOLLOW-UP INSPECTION: During this inspection (RS24-008) Staff reviewed records provided by the Operator for the documentation of their MAOP's. Staff determined that the records provided were not sufficient to demonstrate an established MAOP for each of the Operator's pipeline segments.

Staff determined that this violation could not be cleared at this time.

OPERATOR RESPONSE FORM

Operator Name: Tri-County Natural Gas

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37093

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
☐ Warning Letter	☐ Yes ☐ No
☐ Letter of Concern	☐ Yes ☐ No
☐ Observed Issue	☐ Yes ☐ No
☐ Proposed Civil Penalty	☐ Yes ☐ No

$_____

Proposed Penalty for this violation

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:	)	
	)	
Tri – County Natural Gas Authority	)	**DOCKET NO. 37093**
	)	
	)	
	)	

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

*The Honorable Lanier Rhodes, Mayor
Tri-County Natural Gas
P.O. Box 247
Union Point, GA 30669
mayorlrhodes@gmail.com

*Michelle Thebert, Facilities Protection Unit Director
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

Respectfully Submitted this 5th day of March 2025:

Cathy Nesbitt

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