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Georgia Public Service Commission

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DOCKET# 37077
DOCUMENT#222318

Docket No. 37077

City of Quitman Gas Department
PO Box 208
Quitman, GA 31643-0208

REF: Follow Up Inspection # JS24-009

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Willie Burns

On March 20, 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 JS24-009 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. 37077 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: JS24-009

OPERATOR: City of Quitman Gas Department

INVESTIGATOR: Jason Smith

INSPECTION DATE: March 20, 2024 REPORT MAILED DATE: April 16, 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 Operator's previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JS19-052	12/16/2019

3. CLEARED VIOLATIONS

Cleared on 3/20/2024

Violation	Description	Inspection#	Date
192.615(b)(2)	Train the appropriate operating personnel to assure that they are knowledgeable of the emergency...	AT22-013	3/21/2022
192.615(c)	Each operator shall establish and maintain liaison with appropriate fire, police, and other...	AT22-013	3/21/2022
192.615(b)(3)	Review employee activities to determine whether the procedures were effectively followed in each...	AT22-013	3/21/2022
192.805(b)	Ensure through evaluation that individuals performing covered tasks are qualified.	AT22-013	3/21/2022
192.615(b)(1)	Each operator shall: Furnish its supervisors who are responsible for emergency action a copy of...	AT22-013	3/21/2022
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	AT22-013	3/21/2022
192.615(a)(3)	Each operator shall establish written procedures to minimize the hazard resulting from a gas...	AT22-013	3/21/2022
192.605(b)(3)	Maintenance and normal operations. The manual required by paragraph (a) of this section must...	AT22-013	3/21/2022
192.615(a)(8)	Notifying appropriate fire, police, and other public officials of gas pipeline emergencies and...	AT22-013	3/21/2022
192.615(a)(6)	Emergency shutdown and pressure reduction in any section of the operator's pipeline system neces...	AT22-013	3/21/2022
192.615(a)(4)	The availability of personnel, equipment, tools, and materials, as needed at the scene of an...	AT22-013	3/21/2022
192.615(a)(10)	Beginning action under §192.617, if applicable, as soon after the end of the emergency as possible.	AT22-013	3/21/2022

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JS24-009	3/20/2024

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

NOTE: The City of Quitman is currently in negotiations with the Director for the following proposed civil penalties:

1. DL18-003 /192.465(a) / $2,500 proposed penalty
2. DL18-004 / 192.605(a) / $2,500 proposed penalty
3. DL18-004 / 192.616(c) / $5,000 proposed penalty
4. LB18-042 / 192.615(a)(7) / $5,000 proposed penalty
5. LB18-042 / 192.617 / $5,000 proposed penalty
6. LB18-042 / 192.703(c) / $10,000 proposed penalty
7. LB18-042 / 192.805(b) / $10,000 proposed penalty
8. AT22-013 / 192.615(a)(10) / $5,000 proposed penalty
9. AT22-013 / 192.615(b)(1) / $5,000 proposed penalty
10. AT22-013 / 192.615(b)(3) / $5,000 proposed penalty

CITY OF QUITMAN GAS DEPARTMENT / FOLLOW-UP INSPECTION
INSPECTION NUMBER JS24-009 / DOCKET NUMBER 37077

On March 27 & 28, 2024, Pipeline Safety Staff reported to the City of Quitman to perform a follow-up inspection on the Gas Department's previously existing probable violations.

During this inspection the Operator was represented by:
Josh Lairsey – City of Quitman / ESG Compliance Specialist
Willie Cody – City of Quitman / Gas Supervisor
Sam Yarley - MGAG/SRCS (consultant)

Commission Staff was represented by:
Jason Smith - Lead Inspector
Glen Murphy - Pipeline Safety Inspector

At the time of this inspection the City of Quitman Gas Department was under 12 previously existing probable violations. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATION CLEARED

1. In regard to the probable violation of 49CFR, §192.615(a)(6) which was cited under Inspection Number AT22-013, in that report Staff stated: "The City of Quitman has not planned and developed a shutdown process for any section of their system as needed in the event of an emergency."

   OPERATOR'S FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, the Operator stated: "The City of Quitman is contracting a map showing valve locations and the facilities that they control. This map will be provided by 12/31/22 and will allow for shutdown of specific portions of the system. The city of Quitman will review for accuracy and details as soon as maps are provided."

   OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: The City of Quitman has a complete map showing the location of the natural gas facilities. The City is currently reviewing the map for accuracy and once completed, the City will use the map to assist in determining the valves needed to isolate the system if required during an emergency. The estimated completion date is April 3, 2023.

   FOLLOW-UP INSPECTION: During this inspection Staff reviewed the City of Quitman Gas Department's system map and isolation zone valve list. These items are available for Operator personnel electronically on a tablet (which AD would utilize), computer (which Willie would utilize) and paper copy. The isolation zone valve list identifies which valves shut off a particular pipeline section in the event of an emergency.

   Staff determined that this probable violation, §192.615(a)(6) can be cleared at this time.

2. In regard to the probable violation of 49CFR, §192.615(a)(4) which was cited under Inspection Number AT22-013, in that report Staff stated: The City of Quitman has failed to include procedures for the availability of materials and equipment available if needed at the scene of an emergency.

   OPERATOR'S FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, the Operator stated: The City of Quitman has updated its list of materials and equipment available if needed at the scene of an emergency.

OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: The City of Quitman has updated its list of equipment available if needed at the scene of an emergency. Currently, personnel are working on the completion of the available materials available to personnel at the scene of an emergency. The estimated completion of this is April 3, 2023.

FOLLOW-UP INSPECTION: During this inspection the Operator provided their updated appendix J 'Equipment List' and 'Material List'. The equipment listing now includes a valve wrench as suggested during the initial comp. inspection.

Staff determined that this probable violation, §192.615(a)(4) can be cleared at this time.

3. In regard to the probable violation of 49CFR, §192.615(a)(10) which was cited under Inspection Number AT22-013, in that report Staff stated: "Operator failed to perform an accident investigation for the purpose of determining the causes of the failure and minimizing the possibility of recurrence."

   A Civil Penalty of $5,000.00 was proposed for this probable violation.

   OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, the City of Quitman requested an informal conference to the proposed civil penalty for this violation and stated that: "The City of Quitman's personnel will conduct After Action Reviews as described in its Emergency Plan."

   INFORMAL CONFERENCE: On February 6, 2023, Staff conducted a virtual informal conference with the City of Quitman (Ref. Inspection Number AT23-009). During this meeting, the Operator discussed possible mitigative measures for the proposed civil penalties in Inspection Number AT22-013. Staff advised that it would consider any measures which went beyond the minimum requirements that the Operator was already required to perform. Staff directed the Operator to submit their proposals for mitigation of the proposed civil penalties in writing no later than 14 days following this meeting. The Operator was advised that if their proposals were found to be acceptable, they would be provided with a consent agreement to review which would address the mitigation of the proposed civil penalty and the measures required to address the probable violations.

   OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: "The City of Quitman will provide training to its personnel on completing the After-Action Review as required by our Emergency Manual. This training will be completed no later than April 3, 2023."

   FOLLOW-UP INSPECTION: During this inspection Staff was not able to find where the Operator had any excavation damages or any other type of occurrence since the comp. inspection when this violation was cited (no 2023 excavation damages on annual 7100 reports and none to be able to show example of this being done properly) where they would have had to utilize an 'After Action Review' form.

   Staff reviewed work orders showing Josh Lairsey, ESG Compliance Specialist reviewing work orders completed by Quitman Gas Department personnel (having to do with leaks, construction & repair work).

Staff determined that this probable violation, §192.615(a)(10) can be cleared at this time; however the Operator still needs to address the proposed civil penalty with the Director.

4. In regard to the probable violation of 49CFR, §192.615(b)(1) which was cited under Inspection Number AT22-013, in that report Staff stated: "Operator failed to provide those responsible for emergency response a copy of their procedures as required under Part 192.615(b)(1)."

   A Civil Penalty of $5,000.00 was proposed for this probable violation.

   OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, the City of Quitman requested an informal conference to discuss the proposed civil penalty for this violation and stated that: "The City of Quitman has provided an updated copy of its Emergency Plan to the personnel listed in Appendix O."

   INFORMAL CONFERENCE: On February 6, 2023, Staff conducted a virtual informal conference with the City of Quitman (Ref. Inspection Number AT23-009). During this meeting, the Operator discussed possible mitigative measures for the proposed civil penalties in Inspection Number AT22-013. Staff advised that it would consider any measures which went beyond the minimum requirements that the Operator was already required to perform. Staff directed the Operator to submit their proposals for mitigation of the proposed civil penalties in writing no later than 14 days following this meeting. The Operator was advised that if their proposals were found to be acceptable, they would be provided with a consent agreement to review which would address the mitigation of the proposed civil penalty and the measures required to address the probable violations.

   OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: "The City of Quitman has provided an updated copy of its Emergency Plan to the personnel listed in Appendix O."

   FOLLOW-UP INSPECTION: During this inspection Staff reviewed the Operator's updated appendix O, which shows Quitman Gas Department's personnel has open access to the Emergency Manual electronically and a paper copy (A.D. has access to it on a tablet and Willie has access on computer and both have access to the three-ring binder; and Josh has access on OneDrive / SharePoint for updating and distributing to gas department personnel).

   Staff determined that this probable violation, §192.615(a)(10) can be cleared at this time; however the Operator still needs to address the proposed civil penalty with the Director.

5. In regard to the probable violation of 49CFR, §192.615(b)(2) which was cited under Inspection Number AT22-013, in that report Staff stated: "Operator has failed to meet the requirements of emergency plan training as stated in Part 192.615(b)(2)."

   A Civil Penalty of $5,000.00 was proposed for this probable violation.

   OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, the City of Quitman requested an informal conference to the proposed civil

penalty for this violation and stated that: "The City of Quitman has provided training for its personnel who receive after hours emergency calls. Also, the City of Quitman is no longer using a contractor for this emergency function.

INFORMAL CONFERENCE: On February 6, 2023, Staff conducted a virtual informal conference with the City of Quitman (Ref. Inspection Number AT23-009). During this meeting, the Operator discussed possible mitigative measures for the proposed civil penalties in Inspection Number AT22-013. Staff advised that it would consider any measures which went beyond the minimum requirements that the Operator was already required to perform. Staff directed the Operator to submit their proposals for mitigation of the proposed civil penalties in writing no later than 14 days following this meeting. The Operator was advised that if their proposals were found to be acceptable, they would be provided with a consent agreement to review which would address the mitigation of the proposed civil penalty and the measures required to address the probable violations.

OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: "The City of Quitman has provided training for its personnel who receive after-hours emergency calls. Also, the City of Quitman has removed the contractor listed on the On-Call list."

FOLLOW-UP INSPECTION: During this inspection the Operator demonstrated to Staff that they have been providing Emergency Manual training to personnel who receive after-hours emergency calls. A 'Training Sign-In Sheet' for Willie Cody & AD Phillips reviewing newly established isolation zones for possible use during an emergency and appendix F, G and L of the Emergency Manual dated 12/12/2023; which was signed off by Josh Lairsey was provided for review. In addition, the Quitman Gas Department no longer has their contractor listed as an entity that receives after-hours emergency calls.

Staff determined that this probable violation, §192.615(b)(2) can be cleared at this time; however the Operator still needs to address the proposed civil penalty with the Director.

6. In regard to the probable violation of 49CFR, §192.615(b)(3) which was cited under Inspection Number AT22-013, in that report Staff stated: "The City of Quitman failed to perform the requirements of Part 192.615(b)(3) and their emergency procedures."

   OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, the Operator stated: The City of Quitman will follow its Emergency Plan and will review future emergency activities upon completion. The Gas Superintendent has been retraining in the completion of work orders.

   OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: The City of Quitman will follow its Emergency Plan and will review future emergency activities upon completion. The Gas Superintendent and field personnel will receive additional training on the completion of work orders. This training is estimated to be completed no later than April 3, 2023.

   FOLLOW-UP INSPECTION: During this inspection Staff found that Quitman's Emergency Manual states, "Generally, a review of work orders or other completed documentation from field personnel

will serve as documentation to support that procedures are effective and followed. However, in instances where the events warrants contacting PHMSA, Appendix Q should be completed and filed." Since Quitman Gas has not had any 3rd Party damages since the inspection when this probable violation was cited, Staff reviewed work orders that show Josh Lairsey reviewing work orders (having to do with leaks, construction, repair work).

Staff determined that this probable violation, §192.615(b)(3) can be cleared at this time.

7. In regard to the probable violation of 49CFR, §192.615(c)(1);(2);(3) and (4) which was cited under Inspection Number AT22-013, in that report Staff stated: "The City of Quitman failed to perform liaison with all required public officials in their service area for emergency preparedness."

   OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, the Operator stated: "The City of Quitman has conducted liaison meetings with Emergency Officials and Public Officials."

   OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: "The City of Quitman has conducted liaison meetings with Emergency Officials and Public Officials"

   FOLLOW-UP INSPECTION: During this inspection Staff reviewed Quitman Gas Department's records showing liaison has been completed with the city of Quitman's Fire Chief. Appendix C-1 - City of Quitman Public Officials, Contacts List contains information on the area electric, water and transmission gas pipeline operators.

   Staff determined that this probable violation, §192.615(c)(1)(2)(3)(4) could be cleared at this time.

8. In regard to the Notice of Amendment for 49 CFR, §192.181(a) which was cited under Inspection Number AT22-013, in that report Staff stated: "The City of Quitman must amend their procedures to address the placement of distribution line valves for their system."

   OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, Quitman Gas Department stated: "The City of Quitman is aware that GPSC Staff is preparing a Notice of Proposed Rulemaking that will include requirements related to valve placement. Upon final approval of this Proposed Rule, the new requirements will be incorporated into Quitman's manuals, plans, and procedures, as appropriate. The City of Quitman is preparing a map showing valve locations and the facilities that these valves control."

   OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: "The City of Quitman will amend their procedures to include a process for valve location installation(s). The estimated completion date is no later than April 3, 2023."

   FOLLOW-UP INSPECTION: During this inspection Staff reviewed the city of Quitman Gas Department's updated 'Valve Installation Guidelines' and system. Staff found that Quitman has developed a valve placement procedure specific to their gas system.

Staff determined that this probable violation, §192.181(a) could be cleared at this time.

9. In regard to the Notice of Amendment for §192.615(a)(8) which was cited under Inspection Number AT22-013, in that report Staff stated:
   "1) The City of Quitman must amend their procedures to ensure that they are notifying appropriate fire, police, and other public officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.

   2) The City of Quitman must amend their procedures to instruct personnel to notify their 911 call center when a possible pipeline rupture is indicated."

   OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, Quitman Gas Department stated:
   "1) The City of Quitman will coordinate with the local Emergency Management Agency to determine the manner in which communication is maintained during an emergency.

   2) The City of Quitman will revise its Manuals and/or Procedures to address contacting 911 in the event of a potential pipeline rupture by the effective date of this new requirement."

   OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: "The City of Quitman will coordinate with the local Emergency Management Agency to determine the manner in which communication is maintained during an emergency and will modify our procedures as appropriate."

   FOLLOW-UP INSPECTION: During this inspection Staff reviewed Section 1 of Quitman's Emergency Manual which states during normal business hours (8:00am – 5:00pm) all calls are received at Brooks County 911 by calling 229-263-4166 or Quitman Fire Department @ 229-263-4166, or in case of an emergency: 9-1-1. After business hours, on weekends and holidays, all calls are received at Quitman Fire Department by calling 229-263-4166 or in case of emergency: 9-1-1.

   Staff then reviewed Appendix A-2 'City of Quitman Emergency Contact On-Call List' which notes that if there is a loss of landlines and/or cell tower coverage, the City of Quitman gas department has access to two-way radios along with other Emergency personnel within the City/County to maintain an active line of communication if needed during an emergency.

   Staff determined that this probable violation, §192.615(a)(8) could be cleared at this time.

10. In regard to the Notice of Amendment for 49CFR, §192.615(a)(3)(i);(ii);(iii) and (iv) which was cited under Inspection Number AT22-013, in that report Staff stated: "The City of Quitman must amend their procedures to instruct persons receiving and responding to any type of pipeline emergencies on who will actually be on call for the City of Quitman at any given time if the primary contact Mr. Willie Cody is unavailable. Also, include process for contacting the person who will be covering for Mr. Willie Cody and let them know they are on call so that they are prepared to response promptly."

OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, the Operator stated: "The City of Quitman has updated its On-Call List to show the individuals who will be on-call and has a process in place for advising all individuals that might be called upon in an emergency."

OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: "The City of Quitman has updated its On-Call List to show the individuals who will be on-call and has a process in place for advising all individuals that might be called upon in an emergency."

FOLLOW-UP INSPECTION: During this inspection Staff reviewed Quitman Gas Department's updated appendix A-2 and C-3 of their Emergency Manual. Appendix A-2 'city of Quitman Emergency Contact On-Call List' which no longer list the Mayor & City Canager. It now lists Willie Cody, A.D. Phillips; and ESG's Project Manager, Regional Manager and Compliance Specialist. Appendix C-3 'city of Quitman Emergency Contact List' no longer list the mayor, only Willie Cody and A.D. Phillips.

Staff determined that this probable violation, §192.615(a)(3)(i);(ii);(iii)and (iv) could be cleared at this time.

11. In regard to the Notice of Amendment for 49CFR, §192.615(c)(1);(2);(3) and (4) which was cited under Inspection Number AT22-013, in that report Staff stated: "The City of Quitman must amend their procedures to include electric and other utilities in their service area as other public officials for the purpose of liaison."

    OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, the Operator stated: "The City of Quitman has revised its liaison process to include other utilities and has conducted liaison with the affected other utilities."

    OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: "The City of Quitman is currently working on identifying all audiences that need to be included in the liaison list/meetings. The estimated completion of this is no later than April 3, 2023."

    FOLLOW-UP INSPECTION: During this inspection Staff reviewed the Operator's updated appendix C-1 City of Quitman's Public Officials, Contacts List and found it contains contact information on the area electric, water and transmission gas pipeline operators.

    Staff determined that this probable violation, §192.615(c)(1)(2)(3)(4) could be cleared at this time.

12. In regard to the Notice of Amendment for 49CFR, §192.455(e) which was cited under Inspection Number AT22-013, in that report Staff stated: "The City of Quitman must amend their procedures to address the requirements of §192.455(e)."

OPERATORS FIRST RESPONSE: In their response letter to Inspection Number AT22-013, dated December 13, 2022, the Operator stated: "The City of Quitman will by April 30, 2023, revise its manuals to indicate that it will not install buried aluminum materials on its natural gas system."

OPERATORS SECOND RESPONSE: In their second response letter to Inspection Number AT22-013, dated February 17, 2023, the Operator stated that: "The City of Quitman will, by April 3, 2023, revise its manuals to indicate that it will not install buried aluminum materials on its natural gas system."

FOLLOW-UP INSPECTION: During this inspection Staff reviewed the Operator's updated procedure which now states: "The City of Quitman does not allow any amphoteric metals to be installed buried or submerged within the natural gas system."

Staff determined that this probable violation, §192.455(e) could be cleared at this time.

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Letters Issued by the Georgia Public Service Commission.

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No ☐

Operator Name: City of Quitman

Docket Number: 37077

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	$_____ Proposed Penalty for this violation
☐ Notice of Amendment (NOA)	☐ Yes ☐ No	
☐ 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:	)	
	)	
City of Quitman Gas Department	)	**DOCKET NO. 37077**
	)	
	)	
	)	

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

* Willie Burns, City Manager
City of Quitman Gas Department
P.O. Box 208
Quitman, GA 31643-0208
wburns@quitmanga.gov

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

Respectfully Submitted this 22nd day of April 2025:

Cathy Nesbitt

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