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Georgia Public Service Commission

(404) 463-6526
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244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
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Docket No. 37040

DOCKET# 37040
DOCUMENT#222322

City of Covington Municipal Gas
P. O. Box 1527
Covington, GA 30015
DELIVERED VIA E-MAIL

RE: Inspection Report DJ24-015

Dear Mr. Tres Thomas -

Based on review of City of Covington Municipal Gas's response, discussions with Pipeline Safety Staff and/or Operator, and/or any additional information provided for Inspection Report DJ18-015, I have cleared the following Enforcement Actions:

Violation	Description	Inspection#
192.619(a)	No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum...	DJ18-015

Any new or continuing Enforcement Action(s) not listed above will be addressed during the Operator's future inspection. No action is required by City of Covington Municipal Gas at this time.

Please let me know if there are any questions or concerns regarding this correspondence at (404) 985-4271 or mthebert@psc.ga.gov. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle Thebert
Director, Office of Pipeline/Facilities Safety

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: DJ24-015

OPERATOR: City of Covington Municipal Gas

INVESTIGATOR: Daphne Jones

INSPECTION DATE: March 8, 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 perform a Follow-up inspection of the Operator's previously existing probable violations.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

Cleared on 3/8/2024

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...	DJ18-015	5/7/2018

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On March 11, 2024, Staff reported to the City of Covington to perform a Follow-up inspection of the Operator's previously existing probable violations. Exit meeting was performed on March 14, 2024.

During this inspection the Operator was represented by:
Mike Jewell – Natural Gas Director
Rob Leigh – Operations Manager
Lori Lamberth – MGAG/SRCS (Consultant)

Commission Staff was represented by:
Daphne Jones – Lead Inspector
Jeff Baggett – Pipeline Safety Inspector

At the time of this inspection, the City of Covington was under one previously existing probable violation. Staff reviewed this probable violation with the Operator and determined that:

PROBABLE VIOLATION CLEARED

In regard to the probable violation of 49CFR §192.619(a) which was cited in Inspection Number DJ18-015; in that inspection Staff stated that: "The Operator could not provide records to substantiate their stated MAOP's."

OPERATOR RESPONSE: In their response letter to Inspection Number DJ18-015, dated September 13, 2018, the City of Covington stated that: "Covington is compiling documentation to substantiate the MAOP of its facilities. This process is expected to be completed by March 1, 2019."

FIRST FOLLOW-UP INSPECTION: On May 16, 2019, Staff conducted a Follow-up Inspection of the Operator's previously existing probable violation (Ref: Inspection #DJ19-022). In this inspection Staff stated: "Staff reviewed MAOP records provided by the Operator, which are based on the last 5-years of operational history for each pressure system in their natural gas system. (Ref: Covington O&M Manual, Appendix T-1)

Staff determined that the records provided by the Operator only indicate a review of the last 5 years of operating history, and not the complete operating history of the pipeline segments. Staff also observed that the records provided by the Operator indicate that some of these segments have been in service since 1953, while other segments state "unknown" for an installation date. Staff noted that in Part B, Section 4 of the Operators current annual report (PHMSA Form 7100) it indicates that there are no unknown time frames for decades of installation for facilities.

Staff determined that this record alone (Appendix T-1) does not demonstrate that the Operator has considered the complete operating history of these pipeline segments as required under §192.614(a)(4). This record also fails to demonstrate that the stated MAOP for these segments is in fact the lowest of the pressures which must be determined under §192.619(a) to establish a maximum allowable operating pressure."

OPERATOR RESPONSE: In their response letter to Inspection Number DJ19-022, dated January 22, 2020,

the Operator stated that: "Covington is currently reviewing its records and preparing documentation demonstrating that is has considered all requirements and provisions of 192.619, including the history of the relevant pipeline segments per 192.619(a)(4). This process will be completed by July 1, 2020."

SECOND FOLLOW-UP INSPECTION: On July 28, 2020, Staff conducted a Follow-up Inspection of the Operator's previously existing probable violation (Ref: Inspection #JS20-031). In that inspection Staff stated: "During this inspection the Operator advised that they are near completion of work related to this probable violation but have been delayed by the COVID-19 pandemic and having to work remotely for several weeks."

OPERATOR RESPONSE: In their response letter to Inspection Number JS20-031, dated November 2, 2020, the Operator stated: "Covington is still experiencing constraints and delays associated with the COVID-19 pandemic. City Hall remains closed and management personnel are working from home part of the time. For this reason, Covington cannot at this time project a completion date for review of documentation related to this Continuing Violation. Covington will advise GPSC Staff of the anticipated completion date when it can be determined."

THIRD FOLLOW-UP INSPECTION: On July 28, 2021, Staff conducted a Follow-up Inspection of the Operator's previously existing probable violation (Ref: Inspection #JH21-028). In this inspection Staff stated: "the Operator advised that they are near completion of work related to this probable violation but have been delayed by the COVID-19 pandemic and having to work remotely for several weeks."

OPERATOR RESPONSE: In their response letter to Inspection Number JH21-028, dated October 21, 2021, the Operator stated: "Covington has experienced constraints and delays associated with the COVID-19 pandemic. Covington currently expects to complete the documentation necessary to clear this Continuing Violation by January 31, 2022."

CONSTRUCTION INSPECTION: On April 25, 2022, Staff reported to the City of Covington Gas System to perform a Construction Inspection (Ref: Inspection #RS22-009). At the time of this inspection the Operator was under one previously existing probable violation originating from comprehensive inspection #DJ18-015.

Staff did not conduct a Follow-up Inspection of the Operator's previously existing probable violation during this Inspection #RS22-009.

OPERATOR RESPONSE: In their response letter to Inspection Number RS22-009 dated February 21, 2023, the Operator stated: 'Covington has completed the documentation necessary to clear this Continuing Violation. The documentation is available for Staff's review."

METHAN EMISSION PLAN INSPECTION: On June 22, 2022, Staff reported to the City of Covington Gas System to perform an inspection of the Operator's methane emission reduction plan. (Ref: Inspection #JS22-013). In this inspection Staff stated: "While Staff looked at some documentation, the Operator presented to address the §192.619(a) violation, it was determined that more time would be needed review the records Covington has put together. Staff was not able to clear this probable violation at this time."

Staff did not conduct a Follow-up Inspection of the Operator's previously existing probable violation during this Inspection #JS22-013.

OPERATOR RESPONSE: In their response letter to Inspection Number JS22-013 dated August 11, 2022, the Operator stated: 'Covington has completed the documentation necessary to clear this Continuing Violation. The documentation is available for Staff's review."

REVIEW OF OPERATOR RESPONSE: On September 12, 2022, Staff reviewed the Operator's submitted response letter. This is a file only report after review by PSC Director (Ref: Inspection #JS22-027). Staff determined that this violation could not be cleared at this time.

DIMP ANNUAL REVIEW INSPECTION: On March 2, 2023, Staff conducted an annual review of the City of Covington Gas System's Distribution Integrity Management Plan (DIMP) (Ref: Inspection #JS23-016). At the time of this review Covington Municipal Gas System was under one previously existing probable violation. Staff did not review this probable violation at this time because it will require an onsite visit.

OPERATOR RESPONSE: In their response letter to Inspection Number JS23-016 dated December 12, 2023, the Operator stated: 'Covington has completed the documentation necessary to clear this Continuing Violation. The documentation is available for Staff's review."

FOURTH FOLLOWUP INSPECTION: During this inspection number DJ24-015, Staff reviewed MAOP records provided by the Operator, which are based on the maximum safe pressure after considering and accounting for records under 192.619(a)(4), and the history of the pipeline segment for the last 10 years of operational history for each pressure system in their natural gas system.

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

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

OPERATOR RESPONSE FORM

Operator Name: City of Covington

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37040

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 Covington Municipal Gas	)	**DOCKET NO. 37040**
	)	
	)	
	)	

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

*Tres Thomas, Interim City Manager
City of Covington Municipal Gas
P.O. Box 1527
Covington, GA 30015
tthomas@cityofcovington.org

*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