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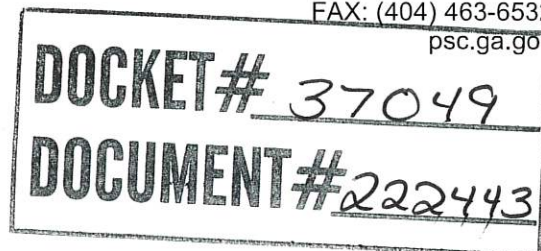
Georgia Public Service Commission

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

244 Washington Street, SW
Atlanta, GA 30334-5701

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

Docket No. 37049



City of Eatonton Gas System
P. O. Box 3820
Eatonton, GA 31024

REF: Public Awareness Inspection # JS24-039

☐ Certified Mail

☐ Regular Mail

☒ Email

Attention: Mr. Gary Sanders

On November 25, 2024, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JS24-039 is provided for your information and file.

In conjunction with this inspection report, Staff has recommended the following enforcement(s):

Enforcement Action:

- ☐ Notice of Probable Violation
- ☐ Notice of Probable Violation with Proposed Civil Penalty
- ☐ Notice of Amendment

Enforcement Letter:

- ☐ Warning Letter
- ☐ Letter of Concern

Enforcement Notification:

- ☐ Observed Issue
- ☒ No Violation

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Actions, Enforcement Letters, and Notifications Issued by the Georgia Public Service Commission. Please refer to Docket No. 37049 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: JS24-039

OPERATOR: City of Eatonton Gas System

INVESTIGATOR: Jason Smith

INSPECTION DATE: November 25, 2024

REPORT MAILED DATE: April 29, 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 an inspection of the Operator's Public Awareness Program (PAP) for compliance with the minimum federal standards in 49CFR §192.616.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	AT21-025	9/20/2021
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	AT23-003	1/10/2023
515-9-3-.09	Response Options Open to the Operator	AT23-003	1/10/2023

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

On November 10, 2024, Pipeline Safety Staff requested that the City of Eatonton Gas System provide their Public Awareness Plan for Staff to prepare for an upcoming inspection. The Operator provided Staff with a copy of their PAP version 2.1, and on November 25, 2024, Staff began reviewing the PAP.

On December 10, 2024, Staff reported to the City of Eatonton Gas System to perform a Public Awareness Program inspection.

During this inspection, the Operator was represented by:

Charles Bales - Gas Superintendent

Pat Welch - Gas Department Administrator

Wade Sharpe - 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 Eatonton Gas System was under two existing probable violations; §192.181(a) and Commission Rule 515-9-3-.09. Staff did not review these violations with the Operator at this time because they had not yet received the previous follow-up inspection; #DL24-006.

NO VIOLATIONS FOUND

During this inspection, Staff reviewed Eatonton Gas System's Public Awareness Plan version 2.1 utilizing PHMSA Public Awareness Program Effectiveness Inspection form 21 to record the findings. Staff examined supporting records/documentation to verify compliance with the minimum safety standards.

While on site Staff performed Operator Qualification Protocol 9 field validation inspections on gas department personnel to ensure that covered tasks are being performed in accordance with appropriate operator-approved procedures. The Operator provided qualification records for Jesse Cason, Matt Hering and Cody Huckaby for Staff to examine prior to observing performance of the tasks. Staff verified that qualification records for these individuals were current.

Jesse Cason – Senior Gas Tech, performed task #0141 'Visual Inspection of Atmospheric Corrosion' and is qualified through 2/1/2026.

Matt Hering – Senior Gas Tech, performed task #0101 'Inspect Rectifier and Obtain Readings' and is qualified through 2/17/2027.

Cody Huckaby – Gas Tech / Meter Reader, performed task #0001 'Measure Structure-to-Electrolyte Potential' and is qualified through 4/20/2027.

Staff verified that all three individuals were able to perform the covered tasks according to the procedures and were able to identify generic and task specific abnormal conditions.

As a result of this inspection Staff noted no probable violations of the minimum federal safety standards.

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 Eatonton

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37049

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

- | | | |
|--|--|--|
| <input type="checkbox"/> Notice of Probable Violation (NOPV) | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Notice of Amendment (NOA) | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Warning Letter | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Letter of Concern | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Observed Issue | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <input type="checkbox"/> Proposed Civil Penalty | <input type="checkbox"/> New <input type="checkbox"/> Continuing | <input type="checkbox"/> Yes <input type="checkbox"/> No |

\$

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):

- ☐ Written statement indicating that corrective measures have achieved Compliance or
- ☐ Written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated.

B. Response for **NOA**:

- ☐ **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
- ☐ **Not Contested**: Explanation, information, or other material believed to warrant modification of the NOA in whole or in part; or
- ☐ 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:

☐ Notice of Probable Violation (NOPV)

☐ Notice of Amendment (NOA)

☐ Warning Letter

☐ Letter of Concern

☐ Observed Issue

☐ Proposed Civil Penalty

Conference Requested:

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

☐ Yes ☐ No

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Proposed Penalty for this violation

OPERATORS RESPONSE: _____

Response Provided by: _____

Name / Title

Date: _____

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: _____

OPERATOR RESPONSE FORM

Operator Name: City of Eatonton

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37049

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 Eatonton Gas System

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DOCKET NO. 37049

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

*Gary M Sanders, City Administrator
City of Eatonton Gas System
P.O. Box 3820
Eatonton, GA 31024
gsanders@eatontonga.us

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

Respectfully Submitted this 5th day of May 2025:

Cathy Nesbitt

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