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MAY 15 2025

Georgia Public Service Commission

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

EXECUTIVE SECRETARY
GPSC

244 Washington Street, SW
Atlanta, GA 30334-5701

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

Docket No. 37024



AGL - Operations and Engineering
Ten Peachtree Place, NE Suite 1000
Location 1365
Atlanta, GA 30309

REF: Comprehensive Inspection # JB24-013

☐ Certified Mail

☐ Regular Mail

☒ Email

Attention: Mr. Pedro Cherry

On June 10, 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 JB24-013 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. 37024 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: JB24-013

OPERATOR: AGL - Milledgeville

INVESTIGATOR: Jeff Baggett

INSPECTION DATE: June 10, 2024

REPORT MAILED DATE: May 1, 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 comprehensive inspection of the Operator's plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

ATLANTA GAS LIGHT COMPANY – MILLEDGEVILLE SERVICE CENTER / COMP INSPECTION
INSPECTION NUMBER JB24-013 / DOCKET NUMBER 37024

Between June 10 and August 5, 2024, Staff met with representatives from the Atlanta Gas Light Company to review records of operations and maintenance activities in preparation for comprehensive inspections of the Clayton, Conyers, Milledgeville, Newnan, Northwest GA (NWGA / Rome), Valdosta, Vidalia and Waycross Service Center.

From September 9-12, 2024, Staff performed a review of emergency response plans and records, and field evaluations of facilities in the Milledgeville Service Center. (Baldwin, Johnson, Jones, Washington and Wilkinson County)

During this inspection, the Operator was represented by:
Rick Slagle - Director, Compliance and Quality Assurance
Ralph McCollum - Principal Compliance Engineer
Travis Williams - Director, Regional Operations
David Hawkes - Operations Supervisor
Rex Hall - Operations Supervisor
Ron Hollaway - Operations Supervisor
Harold Pollard - Operations Supervisor
Rhonda Smith - Operations Supervisor
David Adams – Operations Foreman
Stephen Pevey – Superintendent, System Ops
Jeff Harville - Superintendent, System Ops
Matt Jordan - Director, Corrosion Control and Design
Nick Kitzmiller - Corrosion Control Manager
Roger Jochum - Corrosion Control Supervisor

Commission Staff was represented by:
Jeff Baggett – Lead Inspector / Supervisor, Facilities Protection Unit
David Lewis – Pipeline Safety Inspector
Jack Hewitt – Pipeline Safety Inspector
Eric Atkins– Pipeline Safety Inspector
Jason Smith – Pipeline Safety Inspector
Chuck Whitaker– Pipeline Safety Inspector
Glen Murphy – Pipeline Safety Inspector
Joe Jones – Pipeline Safety Inspector

At the time of this inspection the AGLC Milledgeville Service Center had no previously existing probable violations.

As a result of this inspection Staff found that the AGLC Milledgeville Service Center was in probable violation of the minimum federal safety standards; specifically:

WARNING LETTER

1. §192.603 General provisions
 - (b) Each operator shall keep records necessary to administer the procedures established under §192.605.

STAFFS COMMENTS: Under §192.615(c) each operator must establish and maintain liaison with the appropriate public safety answering point, as well as fire, police, and other public officials.

In Division II, Section 22, Item 22.3.1 of the AGLC OPM it states: “Each service center shall establish and maintain liaison with appropriate fire, police and other public officials and appropriate railroad personnel where pipelines share a common right-of-way or cross the railroad’s rights-of-way to perform the following. Public officials are officials within the public sector where direct assessment of a natural gas emergency may be essential knowledge to protecting the safety of the general public.”

During this inspection the Operator could not provide documentation for liaison activities for CY 2020.

PROBABLE VIOLATION: The Operator failed to maintain records to demonstrate compliance with the liaison requirements of §192.615(c) for CY 2020.

2. §192.613 Continuing surveillance.

- (b) If a segment of pipeline is determined to be in unsatisfactory condition but no immediate hazard exists, the operator shall initiate a program to recondition or phase out the segment involved, or, if the segment cannot be reconditioned or phased out, reduce the maximum allowable operating pressure in accordance with §192.619 (a) and (b).

STAFFS COMMENTS: During this inspection Staff observed conditions that appear to indicate that the Operator has failed to comply with their procedures for continuing surveillance. In Division II, Section 1, Page 1 of the AGLC OPM it states:

“Included in this Division are procedures for the continuing surveillance of the Company’s gas system(s) and instructions concerned with safety of the general public. Company policy requires that personnel make every effort to identify and report factors or conditions that may adversely affect the safe operation of Company facilities.

Continuing surveillance of the gas system(s) and the appropriate actions to take concerning changes in class locations, failures, leakage history, corrosion, substantial changes in cathodic protection requirements, and other unusual operating and maintenance conditions are identified in the following sections:

1. Division II, Section 2 - PATROLLING AND INSPECTION OF GAS SYSTEMS;
2. Division II, Section 3 - DAMAGE PREVENTION;
3. Division II, Section 4 - LEAK SURVEYS, INVESTIGATIONS AND REPORTS;
4. Division II, Section 6 - REPAIR AND REPLACEMENT;
5. Division II, Section 7 - INVESTIGATION OF FAILURES;
6. Division II, Section 8 - CORROSION CONTROL MONITORING;
7. Division II, Section 11 - VALVE INSPECTION AND MAINTENANCE;
8. Division II, Section 12 - REGULATOR STATIONS, PRESSURE GAUGES AND TELEMETERING;
9. Division II, Section 13 - CUSTOMER METER AND REGULATOR INSPECTIONS;
10. Division II, Section 15 - ODORIZATION; and
11. Division II, Section 18 - CLASS LOCATIONS.;

a) In Division II, Section 4, Item 4.7.3 of the AGLC OPM it states:

“The adequacy of all leak repairs must be checked by acceptable methods (soap test, etc.) immediately after the repairs are completed. The perimeter of the leak area should be checked with a combustible gas indicator. Where there is residual gas in the ground, a

follow-up inspection should be made according to the following schedule as soon as the gas has had an opportunity to dissipate:

1. Grade 1 Leaks

A follow-up inspection shall be made within one (1) month of the leak repair. It is preferable to wait at least fourteen (14) days after repair before completing the recheck.

2. Grade 2 Leaks

A follow-up inspection shall be made no later than six (6) months (or three months for petroleum gas) after the leak repair.”

- Staff performed a recheck of leak repairs at 430 S Jefferson St in Milledgeville. The Operators records indicated that a Grade 1 leak was found at this location on August 17, 2022. The leak was repaired on August 17, 2022. The location was resurveyed and reported as negative on Oct 5, 2022. A Business District leak survey was conducted on November 6, 2023, and no leak was reported. This location was rechecked on September 9, 2024, by AGLC and Staff and a Grade 2 leak was found.
 - Staff performed a recheck of leak repairs at 196 Helen Circle, Milledgeville. The Operators records indicated that a Grade 2 leak was found at this location on November 20, 2021. The leak was repaired on December 9, 2021. This location was resurveyed on April 5, 2023, and no leaks were reported. This location was rechecked on September 9, 2024, by AGLC and Staff and a Grade 2 leak was found.
- b) Division II, Section 13, Item 13.6.2 of the AGLC OPM it states that large turbine meters are to be inspected every two (2) years. Division II, Section 8, Item 8.22 of the AGLC OPM addresses when atmospheric corrosion inspections are conducted, and states that: “In many cases atmospheric corrosion inspections may be performed during other operating and maintenance initiatives.” It goes on to reference Division II, Section "13.3 Inspection of Large Commercial and Industrial Meter and Regulator installations.”

In addition, Division II, Section 8, Item 8.22 also states that: “Remedial action shall be taken whenever necessary to maintain protection against atmospheric corrosion. Light surface oxidation or minor atmospheric corrosion that does not affect the safe operation of the pipeline before the next scheduled inspection does not require remedial action. However, it is considered good practice to recoat aboveground facilities before the coating further deteriorates and more extensive remediation is required.”

During this inspection Staff reviewed the Operators metering facilities at the Imerys Sandersville Calcine Plant, at 618 Kaolin Road in Sandersville.

- Staff noted that the Operators records indicated that this facility was inspected for atmospheric corrosion on December 7, 2023; however, Staff examined the 6” large industrial metering station and discovered general corrosion over the entire pipe and metering components which appears to have existed for some time.
- During the exit interview Staff was informed that this station had been painted in 2021, however, Staff noted that there was a short 2” run inside the fenced station that appeared to have been painted much more recently with no active corrosion. Staff also observed a Honeywell EC 350 Mercury LVC (Serial # 2413498684) unit that showed no signs of corrosion or dust buildup and which appeared to have been installed on the meter recently.

PROBABLE VIOLATION: AGLC failed to ensure that when unsatisfactory condition with their facilities are found that they are properly reported, evaluated, and remediated as required.

ITEMS OF CONCERN

1. §192.481 Atmospheric corrosion control: Monitoring.
 - (a) Each operator must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:
 - (2) Onshore Service Line: At least once every 5 calendar years, but with intervals not exceeding 63 months, except as provided in paragraph (d) of this section.

STAFFS COMMENTS: In Division II, Section 8, Item 8.23 of the Operators OPM is states: “Inspect each onshore pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion at least once every 3 calendar years, but with intervals not to exceed 39 months.

During this inspection Staff found isolated services that have not been monitored and not on the AC inspection list. These were at 507 South Wayne St, Milledgeville; and 130 West Baldwin St, Milledgeville. (This location was a riser only and was not locked)

STAFFS CONCERN: AGLC failed to demonstrate that they inspected and evaluated each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion as required.

2. §192.615 Emergency plans.
 - (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency...
 - (b) Each operator shall:
 - (3) Review employee activities to determine whether the procedures were effectively followed in each emergency.

STAFFS COMMENTS: Staff found that AGLC’s procedure was inadequate because it does not include steps for personnel to follow when reviewing an employee’s activities following an emergency to determine whether that employee effectively followed the procedures. During this inspection Staff requested records which demonstrated that employee activities were reviewed following emergencies. Staff found that AGLC’s procedure for compliance with the requirements of §192.615(b)(3) is in Division 2, Section 22, Item 22.3.1 of their Operations and Procedures Manual (OPM), but it does not have an actual procedure and simply parrots the code language when it states: “Each service center shall: 3. Review employee activities to determine whether the emergency procedures were effectively followed in each emergency.”

Staff also found that the actual process for review of emergencies under §192.615(b)(3) is the same process for the periodic review of completed work required by §192.605(b)(8). Reviews of completed work appear to only occur on work orders in the “Click Reviewer” system when they are flagged by the system as having a “business warning.” Staff intends to address this issue with AGLC as notice to amend their procedure for this requirement.

STAFFS CONCERN: The AGLC Milledgeville Service Center failed to demonstrate that they are reviewing their employee activities to determine whether their emergency procedures were effectively followed in each emergency.

3. §192.469 External corrosion control: Test stations.

Each pipeline under cathodic protection required by this subpart must have sufficient test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection.

STAFFS CONCERN: Staff was not able to adequately evaluate the Operators system to determine if there are sufficient test points. PHMSA Enforcement Guidance for §192.469 states that “The operator must have sufficient test stations where data is collected to demonstrate that its entire pipeline is cathodically protected. (A test station is the location designated by the operator on a pipeline or facility, where cathodic protection readings are taken.) Test stations for potential, current, or resistance measurements should be provided at sufficient locations to facilitate cathodic protection testing. Such locations may include, but not be limited to, the following: pipe casing installations, metallic structure crossings, isolating joints, waterway crossings, bridge crossings, valve stations, galvanic anode installations, road crossings, stray-current areas, and rectifier installations...”

Prior to arriving on-site AGLC provided Staff with a listing of facilities that indicated that the Milledgeville Service Center is operating 200.8 miles of steel mains and more than 12,700 services (exact number of steel services was not determined) in a five (5) county area. Cathodic protection for these facilities is provided by 14 rectifiers that are located across four (4) of the five (5) counties. During this inspection AGLC provided Staff with a “Test Point Reads (Audit)” from their CPDM system. For the Milledgeville Service Center this report was a PDF file and an Excel spreadsheet that is more than 3,000 lines long and cannot be filtered to allow for a high level review of the data. AGLC was also unable to provide a readily accessible map or access to a mapping system that Staff could use to gain a proper perspective as to where cathodic protection facilities and test points are located in reference to the specific pipeline segments that are being monitored in their system. The Operators corrosion personnel can generate some maps to evaluate areas, but the time required to perform an overall system evaluation by this method is not reasonable for either party.

4. §192.615 Emergency plans.

(b) Each operator shall:

(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.

STAFF COMMENTS: In Division III, Section 22, Item 2.3.1 Item number 6 of the Operators Procedures manual it states that: (6) The Emergency Manual, when not in use, should be kept in the office or other secure location safe where it will not be available to unauthorized persons. Key company employees will be supplied copies of appropriate parts of the manual in accordance with an approved book distribution, and they are expected to be familiar with the emergency procedures.

STAFFS CONCERN: Staff’s concern regarding training of the Emergency Manual, although AGLC-Milledgeville claims and documents employees training of the Emergency Procedures is done in their Riverdale Center, the Emergency Manual is site specific to each service center and contains the specific information pertaining to that service center. AGLC-Milledgeville states in their OPM that “key employees will be supplied copies of appropriate parts of the manual”, and Staff is concerned that the generic training on procedures is missing the specifics of the service center.

During this inspection the Operator was unable to provide documentation which demonstrates that they are training their employees according to the requirements of §192.615(b)(2). Staff will also address this concern with AGLC Corporate.

5. §192.491 Corrosion control records.
 - (a) Each operator shall maintain records or maps to show the location of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system. Records or maps showing a stated number of anodes, installed in a stated manner or spacing, need not show specific distances to each buried anode.
 - (b) Each record or map required by paragraph (a) of this section must be retained for as long as the pipeline remains in service.
 - (c) Each operator shall maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist...

STAFFS CONCERN: During this inspection Staff was not able to perform an adequate review of the Operators cathodic protection (CP) systems. §192.463(a) requires that each cathodic protection system required by this subpart provide a level of cathodic protection that complies with one or more of the applicable criteria contained in Appendix D of this part; and §192.491(c) requires each operator to maintain a record of each test, survey, or inspection required by this subpart in sufficient detail to demonstrate the adequacy of corrosion control measures or that a corrosive condition does not exist.

Section 8.2.5 of the AGLC Operations and Procedures Manual addresses “Records for Monitoring Cathodically Protected Systems” and states that these records are to be “recorded on a corrosion control computer system or as appropriate.” Staff is aware that Atlanta Gas Light Company utilizes the American Innovations Pipeline Compliance System (PCS) Cathodic Protection Data Manager (CPDM) to maintain records for their CP systems. Staff is also aware that the AGLC DIMP program identifies CPDM as the application used by the Corrosion Department for the purposes of CP compliance management.

In previous inspections AGLC has provided Staff with the CPDM Exceptions Report for the service center systems being audited. This report includes survey data and other related information only for facilities that fail to meet certain criteria and is useful in allowing Staff to identify systems with issues that should be reviewed further for compliance. AGLC would not provide this report for this audit. According to the CPDM users guide the software also includes reports for “Compliance” and “Delinquency,” and states that “Compliance reports are a key report typically used for auditing purposes.” AGLC refused to provide these reports.

Prior to arriving on-site AGLC provided Staff with a listing of facilities that indicated that the Milledgeville Service Center is operating 200.8 miles of steel mains and more than 12,700 services (exact number of steel services was not determined) in a five (5) county area. Cathodic protection for these facilities is provided by 14 rectifiers that are located across four (4) of the five (5) counties. During this inspection AGLC provided Staff with a “Test Point Reads (Audit)” from their CPDM system. For the Milledgeville Service Center this report was a PDF file and an Excel spreadsheet that is more than 3,000 lines long and cannot be filtered to allow for a high level review of the data. AGLC was also unable to provide a readily accessible map or access to a mapping system that Staff could use to gain a proper perspective as to where cathodic protection facilities and test points are located in reference to the specific pipeline segments that are being monitored in their system. The Operators corrosion personnel can generate some maps to evaluate areas, but the time required to perform an overall system evaluation by this method is not reasonable for either party.

Staff believes that the CP records provided by AGLC, combined with the time and personnel available for this audit did not allow them to properly evaluate the CP systems in the Newnan Service Center area for compliance with the requirements of SubPart I.

6. §192.465 External corrosion control: Monitoring and remediation.

- (a) Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months, to determine whether the cathodic protection meets the requirements of §192.463. However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.

STAFFS COMMENTS: During this inspection Staff performed a field review of the Operators' facilities and identified facilities that were not being monitored as required:

- 507 S Wayne St., Milledgeville – isolated service – not on monitoring list – below criteria
- 130 W Baldwin St, Milledgeville – isolated service – not on monitoring list – below criteria
- 209 North Ave near Warthen St, Sandersville – not read from 2020 to 2023
- Test Station at Kaolin Road at TN RR, Sandersville – not read in 2022 and 2023
- 3444 Sunhill Road, Sandersville – Not read in 2022 and read low in 2023

Because the CP program is handled statewide by AGLC Corporate Staff is noting this item as a concern for the Service Center and will address it separately the Operators corrosion staff.

STAFFS CONCERN: AGLC failed to ensure that all of their pipeline facilities were monitored as required by §192.465(a).

7. §192.465 External corrosion control: Monitoring and remediation.

- (d) Each operator must promptly correct any deficiencies indicated by the inspection and testing required by paragraphs (a) through (c) of this section. For onshore gas transmission pipelines, each operator must develop a remedial action plan and apply for any necessary permits within 6 months of completing the inspection or testing that identified the deficiency. Remedial action must be completed promptly, but no later than the earliest of the following: prior to the next inspection or test interval required by this section; within 1 year, not to exceed 15 months, of the inspection or test that identified the deficiency; or as soon as practicable, not to exceed 6 months, after obtaining any necessary permits.

STAFFS COMMENTS: In Division II, Section 8, Item 8.1.3 of the Operators OPM is states: "Prompt action shall be taken to correct any deficiencies indicated by these monitoring and inspection procedures. Remediation shall be completed no later than the next required inspection."

During this inspection Staff found locations where deficiencies had been noted during the monitoring required by §192.465(a) but have not been remediated as required.

- 307 South Smith St., Milledgeville – isolated service - reading low since July 2020
- 60 Oak Ave, Milledgeville – Isolated Service - reading low since December 2021
- 3444 Sunhill Road, Sandersville – Not read in 2022 and read low in 2023

ATLANTA GAS LIGHT COMPANY – MILLEDGEVILLE SERVICE CENTER / COMP INSPECTION
INSPECTION NUMBER JB24-013 / DOCKET NUMBER 37024

STAFFS CONCERN: AGLC failed to take prompt remedial action to correct the deficiencies indicated by their monitoring. Because the CP program is handled statewide by AGLC Corporate Staff is noting this item as a concern for the Service Center and will address it separately as a violation to AGLC Corporate and the Operators corrosion staff.

During this inspection Staff performed three (3) OQ Protocol 9 field evaluations.

- Robert A Martinage - Pressure Control Specialist performed “Installing Operating, Inspecting and Testing Pressure Limiting Devices (Regulator Station)” Task #OQ028A. Tasks performed correctly. Qualification verified as current. Qualifications good through 10/21/2027.
- Christopher Dee - Pressure Control Specialist performed “Valve Inspection” Task #OQ052A. Tasks performed correctly. Qualification verified as current Qualifications good through 12/26/2028.
- Reginal V Coley performed “Valve Inspection” Task #OQ052A. Tasks performed correctly. Qualification verified as current Qualifications good through 12/31/2028.

Staff verified that each individual was able to perform the covered tasks according to the procedures and was able to identify generic and task specific abnormal conditions and define the applicable actions.

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: ATLANTA GAS LIGHT COMPANY

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37024

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

\$

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: ATLANTA GAS LIGHT COMPANY

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37024

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:

Atlanta Gas Light Company

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DOCKET NO. 37024

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

* Walt Farrell, President and CEO
Southern Company Gas
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*Michelle Thebert, Facilities Protection Unit Director
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

Respectfully Submitted this 19th day of May 2025:

Cathy Nesbitt

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