PUBLIC DISCLOSURE

Atlanta Gas Light Company
Regarding a Whistleblower Complaint Received by
PHMSA
Docket No. 56146
Responses to Staff's First Set of Data Requests

STF 1-1 **What is the GSCA system / application, and who uses it?**

RESPONSE:

GSCA (GIS Service Card Application) was a GIS web-based viewer utilized for access to the electronic version of service cards. It was used by both Company personnel and its contractors. This application was retired in December 2024 and replaced by Globe GIS.

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STF 1-2 **What is the CQA system / application, and who uses it?**

RESPONSE:

CQA (Contractor Quality Assurance) is a quality management system used to capture field inspections and other pertinent information related to capital construction projects for distribution infrastructure performed by contractors and internal construction crews. It is used by Company personnel and contract inspectors.

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STF 1-3 **Please provide a list of any near misses from the CQA application for the Clayton Service Center for the period of January 2021 through February 2024.**

RESPONSE:

During the timeframe between January 2021 and February 2024, the functionality to capture near miss events was not available in CQA.

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STF 1-4 **What is the ARM system/application, and who uses it?**

RESPONSE:

ARM (Asset Resource Management) is a work management system that generates project work requests. Projects that flow through the ARM system are also billed through ARM. It is used by Construction Operations and contractors.

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STF 1-5 **Does the Company use any contract construction inspectors?**

RESPONSE:

Yes, the Company uses contract construction inspectors.

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STF 1-6: Who with AGLC has stop work authority over the company's contractors?

RESPONSE:

All Company employees and contract employees have Stop Work Authority (SWA) over the Company's contractors.

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STF 1-7: **How does the company document stop-work authority by their inspectors?**

RESPONSE:

Before the latter half of 2024, the Company did not officially record instances of Stop Work Authority being exercised. Starting in the second half of 2024, the Company began tracking instances of Stop Work Authority within CQA.

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STF 1-8: **What positions / personnel in AGLC can override the stop work authority of the company's inspectors?**

RESPONSE:

When Stop Work Authority (SWA) is exercised, a discussion takes place to understand the concern and identify the appropriate corrective actions to mitigate the hazard before work resumes.

In cases where there is disagreement about the perceived unsafe condition, behavior, or situation, a review and assessment take place. This may involve supervisors and/or higher-level management reviewing the situation and making a final determination regarding the validity of the SWA.

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STF 1-9: **Please identify the Service Center Managers for the Clayton Service Center for the period of January 2021 through February 2024.**

RESPONSE:

Between January 2021 through February 2024, there were two Regional Directors and two Operations Managers with management oversight of Clayton Service Center.

Regional Directors	
[redacted]	January 2021 through October 2021
[redacted]	October 2021 through February 2024
Operations Managers	
[redacted]	January 2021 through July 2021
[redacted]	August 2021 through February 2024

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STF 1-10: **Please identify the Service Center Supervisors for the Clayton Service Center for the period of January 2021 through February 2024.**

RESPONSE:

Between January 2021 through February 2024, there were seven Clayton Service Center supervisors.

Clayton Service Center Supervisors	
[redacted]	January 2021 through February 2024
[redacted]	January 2021 through February 2024
[redacted]	January 2021 through February 2024
[redacted]	January 2021 through February 2024
[redacted]	January 2021 through February 2024
[redacted]	January 2021 through February 2024
[redacted]	July 2023 through February 2024

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STF 1-11: **Please identify the construction inspection personnel who performed inspections in the Clayton Service Center territory for the period of January 2021 through February 2024.**

RESPONSE:

Between January 2021 through February 2024, there were eight AGLC Construction Inspectors and four Contract Inspectors servicing the Clayton Service Center territory.

AGLC Construction Inspectors	Contract Inspectors
[redacted]	[redacted]

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STF 1-12: **Please provide copies of any correspondence to or from Clayton Service Center personnel related to issues or concerns with the installation, or the lack of installation of insulated fittings on the outlet side of high-pressure gas services by AGLC contractors.**

RESPONSE:

AGLC objects to this request as it is overly broad, unduly burdensome, and not reasonably limited in terms of scope and time.

This response was prepared by or under the supervision of Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Lindsey S. Williamson, Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

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STF 1-13: **Please provide copies of any correspondence to or from the Company's inspection staff and the Clayton Service Center personnel related to issues or concerns with the installation, or the lack of installation of insulated fittings on the outlet side of high-pressure gas services by AGLC contractors.**

RESPONSE:

Please see response to STF 1-12.

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STF 1-14: **Please provide copies of any correspondence to or from the Company's cathodic protection staff and the Clayton Service Center personnel related to issues or concerns with the installation, or the lack of installation of insulated fittings on the outlet side of high-pressure gas services by AGLC contractors.**

RESPONSE:

Please see response to STF 1-12.

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STF 1-15: **Please provide copies of any correspondence to or from the Company's cathodic protection staff and the Company's inspection personnel related to issues or concerns with the installation, or the lack of installation of insulated fittings on the outlet side of high-pressure gas services by AGLC contractors.**

RESPONSE:

Please see response to STF 1-12.

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STF 1-16: **Please provide any and all documentation related to the installation of the facilities at 270 Cedar Grove Rd in Fairburn, GA 30213.**

RESPONSE:

AGLC objects to this request as it is overly broad, unduly burdensome, and not reasonably limited in terms of scope. Notwithstanding these objections, related documents are attached to this filing in the folder labeled Attachments STF-1-16.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Lindsey S. Williamson, Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

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STF 1-17: **Are contractors who install service lines and meter sets required to be trained?**

RESPONSE:

Yes, per the contract agreement, contractors who install service lines and meter sets are required to be trained.

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STF 1-18: **Does the company train the contractors they hire to install service lines and meter sets?**

RESPONSE:

No, AGLC contractors are responsible for training their workforce.

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STF 1-19: **Does the company qualify the contractors they hire to install service lines and meter sets?**

RESPONSE:

No, contractors are responsible for qualifying their workforce with the appropriate AGLC OQs for the installation of service lines and meter sets.

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STF 1-20: **Please provide any and all documentation related to shallow mains in the Oakhurst Glen subdivision in the city of South Fulton / Fairburn.**

RESPONSE:

AGLC objects to this request as it is overly broad, unduly burdensome, and not reasonably limited in terms of scope. Notwithstanding these objections, related documents are attached to this filing in the folder labeled Attachments STF 1-20 and are available on AGLC's Sharepoint Site in the folder labeled Attachments STF 1-20.

This response was prepared by or under the supervision of Joseph Caubo, Manager of Compliance and Quality Assurance at Southern Company Gas, Leticia Quezada, Director of Compliance and Pipeline Risk Management at Southern Company Gas, Julie Adkins, Chief Litigation Counsel at Southern Company Gas, and Lindsey S. Williamson, Holland & Knight LLP, outside counsel to Atlanta Gas Light Company.

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STF 1-21: **Please provide all documentation related to the construction, installation, testing and tie in of the service line at 6450 Buffington Road in Union City, GA. This includes welder / joiner qualification records.**

RESPONSE:

AGLC objects to this request as it is overly broad, unduly burdensome, and not reasonably limited in terms of scope. Notwithstanding these objections, related documents are attached to this filing in the folder labeled Attachments STF 1-21.

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STF 1-22: **Please provide all documentation related to the construction, installation, testing and tie in of the service line at Castleberry Station, 328 Fair St SW, Atlanta, GA 30313. This includes welder / joiner qualification records.**

RESPONSE:

AGLC objects to this request as it is overly broad, unduly burdensome, and not reasonably limited in terms of scope. Notwithstanding these objections, related documents are attached to this filing in the folder labeled Attachments STF 1-22.

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STF 1-23: **Please provide all documentation related to the construction, installation, testing and tie in of the service line at 244 Peters St, SW, Atlanta, GA 30313.**

RESPONSE:

AGLC objects to this request as it is overly broad, unduly burdensome, and not reasonably limited in terms of scope. Notwithstanding these objections, related documents are attached to this filing in the folder labeled Attachments STF 1-23.

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STF 1-24: **Please provide any and all documentation related to a damaged 2-inch PE main in the vicinity of Persimmon Drive and Umatilla Lane in the Bedford Estates Subdivision in Atlanta, GA 30331.**

RESPONSE:

AGLC objects to this request as it is overly broad, unduly burdensome, and not reasonably limited in terms of scope. Notwithstanding these objections, related documents are attached to this filing in the folder labeled Attachments STF 1-24.

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STF 1-25: **Please provide a copy of the AGLC Sewer Verification Policy.**

RESPONSE:

A copy of the AGLC Sewer Verification Policy, also known as the Cross Bore Prevention, Identification, and Remediation Procedure, is available on the secure Southern Company Gas SharePoint site in the folder labeled STF 1-25.

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STF 1-26: **What position / personnel with AGLC have the authority to approve a directional bore by a contractor without positive verification of sewer mains and laterals?**

RESPONSE:

For directional boring by a contractor, the Construction Director can approve an exception in accordance with Cross Bore Prevention, Identification, and Remediation Procedure in Section 6.1.2.

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