OPERATOR RESPONSE FORM

Operator Name: City of Monroe

Informal Conference Requested: Yes X No ☐

Docket Number: 37070

Responses required within **30 days of electronic mail.** Provide the following information for this report:

Response to Inspection Number: RS24-012

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	$15,000. 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: Logan Propst City Administrator
   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 FORM

Operator Name: City of Monroe

Informal Conference Requested: Yes X No ☐

Docket Number: 37070

Enforcement Action for: §192.481(a) ☒ 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	$5,000.00 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: The City of Monroe requests an informal conference to discuss the probable violation and possible mitigation measures. Historically, the City performs Atmospheric Corrosion (AC) Monitoring every year concurrent with leak surveys. Therefore, the Business District is monitored annually. The City has not experienced an issue with Atmospheric Corrosion (AC). For CY2020 the City switched its provider of Leak Survey and AC monitoring from Ingram & Associates to Sapp Engineering. Documentation from Sapp indicates that Sapp fulfilled its contract obligation in 2020. For CY2021 and CY2022 Sapp only performed the Leak Survey portion of its contract due to a misunderstanding. After discovering that AC monitoring was not documented for 2021 and 2022, the City decided to self-perform AC monitoring and to divide its distribution system into three sections or zones so that the entire system is checked for AC every three years along with leak surveys. For CY2023 and CY2024, 1,246 gas services and 2,278 gas services, respectively were inspected.

Response Provided by: Matthew Peters / Regulatory Compliance (Name / Title) Date: 5/30/25

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

OPERATOR RESPONSE FORM

Operator Name: City of Monroe

Informal Conference Requested: Yes X No ☐

Docket Number: 37070

Comments: _____

Enforcement Action for: 192.625(f) ☒ 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	$5,000.00 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: The City of Monroe requests an informal conference to discuss the probable violation and possible mitigation measures. The City's odorometer was calibrated on 2/26/21. The calibration was good until 3/28/23 (twenty-five months). The City was not aware that readings were being taken with an odorometer that was out of its calibration period. It was an oversight. The odorometer was sent to YZ Systems for calibration in February of 2024 after the City realized that the odorometer was out of calibration. All readings taken with the odorometer while it was out of calibration were consistent with previous readings. In March of 2024, the City purchased a new odorometer from Bartlett Controls at a cost of $6,000 so that one odorometer can be sent for calibration while the second odorometer is still in its calibration period. With two odorometers, the City can ensure that this does not occur again.

Response Provided by: Matthew Peters / Regulatory Compliance (Name / Title) Date: 5/30/25

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

OPERATOR RESPONSE FORM

Operator Name: City of Monroe

Informal Conference Requested: Yes X No ☐

Docket Number: 37070

Cleared Violation: ☐ Yes ☐ No

Comments:_____

Enforcement Action for: 192.723(b)(2) ☒ 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	$5,000.00 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: The City of Monroe requests an informal conference to discuss the probable violation and possible mitigation measures. Historically, the City performs leak surveys annually in the Business District and in one of five residential zones. Therefore, the entire system is surveyed every five years in accordance with the regulations. After discovering that our Leak Survey Service provider, Sapp Engineering, may have missed some gas mains and/or a section of our gas system, the City utilized its GIS mapping to check the accuracy of the mileages shown at surveyed on Sapp's Leak Survey reports. This was done by plotting the gas mains that were surveyed each year based upon the addresses of the services surveyed and totaling the lengths of the gas mains. The City discovered that a total of 190.03 miles of gas mains were surveyed from 2019 to 2023 and a total of 181.8 miles of gas mains were surveyed from 2018 to 2022. These figures are greater than the miles of mains in the system during those five-year periods. The City divided its distribution system into three sections or zones in 2024 so that the entire system is checked for leaks every three years.

Response Provided by: Matthew Peters / Regulatory Compliance (Name / Title) Date: 5/30/25

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.