OPERATOR RESPONSE FORM

Operator Name: ATLANTA GAS LIGHT COMPANY

Informal Conference Requested: Yes ☒ No ☐

Docket Number: 56007

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

Response to Inspection Number: JB25-001

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	$ 45,000 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: Robert D. Highsmith Jr., counsel for AGL
   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: Commission Rule 515-9-1-.06 ☒ 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	$ 15,000 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: Atlanta Gas Light Company requests an informal conference with Staff to discuss the NOPV, NOA, letter of concern, and proposed civil penalty. The Company disputes Staff's finding "that the primary contributing factors to this incident were deficiencies in AGLC's procedures required by §192.605(b)(9), §192.615(a)(4), and §l92.615(a)(5) that allow individuals to perform underground work alone based on their own discretion."

Response Provided by: Robert Highsmith, Counsel for Atlanta Gas Light Company Date: 06/18/2025

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: _____

Operator Response to Enforcement Action

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
☐ Notice of Amendment (NOA)	☐ Yes ☐ No
☐ Warning Letter	☐ Yes ☐ No
☐ Letter of Concern	☐ Yes ☐ No
☐ Observed Issue	☐ Yes ☐ No
☒ Proposed Civil Penalty	☒ Yes ☐ No

$ 15,000
Proposed Penalty for this violation

OPERATORS RESPONSE: Atlanta Gas Light Company requests an informal conference with Staff to discuss the NOPV, NOA, letter of concern, and proposed civil penalty. The Company disputes Staff's finding "that the primary contributing factors to this incident were deficiencies in AGLC's procedures required by §192.605(b)(9), §192.615(a)(4), and §l92.615(a)(5) that allow individuals to perform underground work alone based on their own discretion."

Response Provided by: Robert Highsmith, Counsel for Atlanta Gas Light Company
Name / Title

Date: 06/18/2025

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 to Enforcement Action

Enforcement Action for: §192.481 (a)(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	$ 15,000 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: Atlanta Gas Light Company requests an informal conference with Staff to discuss the NOPV, NOA, Letter of Concern, and Proposed Civil Penalty. The Company disputes Staff's finding "that the primary contributing factors to this incident were deficiencies in AGLC's procedures required by §192.605(b)(9), §192.615(a)(4), and §l92.615(a)(5) that allow individuals to perform underground work alone based on their own discretion."

Response Provided by: Robert Highsmith, Counsel for Atlanta Gas Light Company Date: 06/18/2025

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: _____

Operator Response to Enforcement Action

Enforcement Action for: §192.605 ☒ 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	$
☒ Notice of Amendment (NOA)	☒ Yes ☐ No	Proposed Penalty for this violation
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE: Atlanta Gas Light Company requests an informal conference with Staff to discuss the NOPV, NOA, Letter of Concern, and Proposed Civil Penalty. The Company disputes Staff's finding "that the primary contributing factors to this incident were deficiencies in AGLC's procedures required by §192.605(b)(9), §192.615(a)(4), and §l92.615(a)(5) that allow individuals to perform underground work alone based on their own discretion."

Response Provided by: Robert Highsmith, Counsel for Atlanta Gas Light Company Date: 06/18/2025

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: _____

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: Atlanta Gas Light Company requests an informal conference with Staff to discuss the NOPV, NOA, Letter of Concern, and Proposed Civil Penalty. The Company disputes Staff's finding "that the primary contributing factors to this incident were deficiencies in AGLC's procedures required by §192.605(b)(9), §192.615(a)(4), and §l92.615(a)(5) that allow individuals to perform underground work alone based on their own discretion."

Response Provided by: Robert Highsmith, Counsel for Atlanta Gas Light Company Date: 06/18/2025
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:_____