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FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

(404) 463-6526
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244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
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Docket No. 37070

DOCKET# 37070
DOCUMENT# 223138

City of Monroe Natural Gas Department
P. O. Box 725
Monroe, GA 30655
DELIVERED VIA E-MAIL

RE: Inspection Report RS23-035

Dear Mr. Logan Propes -

Based on review of City of Monroe Natural Gas Department's response, discussions with Pipeline Safety Staff and/or Operator, and/or any additional information provided for Inspection Report JS20-033, I have cleared the following Enforcement Actions:

Violation	Description	Inspection#
515-9-3-.09	Response Options Open to the Operator	JS20-033

Any new or continuing Enforcement Action(s) not listed above will be addressed during the Operator's future inspection. No action is required by City of Monroe Natural Gas Department at this time.

Please let me know if there are any questions or concerns regarding this correspondence at (404) 985-4271 or mthebert@psc.ga.gov. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle Thebert
Director, Office of Pipeline/Facilities Safety

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: RS23-035

OPERATOR: City of Monroe Natural Gas Department

INVESTIGATOR: Brant Sweat

INSPECTION DATE: December 12, 2023 REPORT MAILED DATE: June 26, 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 follow-up inspection of the Operators previously existing probable violations.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

Cleared on 12/12/2023

Violation	Description	Inspection#	Date
515-9-3-.09	Response Options Open to the Operator	JS20-033	9/14/2020

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	RS23-035	12/12/2023

5. OTHER RECOMMENDATIONS/COMMENTS

On December 12th, 2023, Staff reported to the City of Monroe to perform a Part 199 inspection, and a Follow Up inspection of the Operator's previously existing probable violations.

During this inspection the Operator was represented by:
Bryan Pittman– Monroe Gas Superintendent
Matthew Peters – Monroe Regulatory Compliance
Bruce Bagnasco- MGAG/SRCS (Consultant)

Commission Staff was represented by Brant Sweat, Lead Inspector.

At the time of this inspection the City of Monroe was under one (1) previously existing probable violation. Staff reviewed this probable violation with the Operator and determined that:

PROBABLE VIOLATION CLEARED

In regard to the probable violation of Commission Rule 515-9-3-.09 which was cited in the Inspection Number JS20-033; In that inspection Staff Stated that: "The City of Monroe failed to address the Notice of Amendment for their procedure for performing re-checks of hazardous leaks as cited in Inspection Number DL18-029."

Staff proposed a civil penalty of $5,000.00 for this violation.

FIRST FOLLOW-UP INSPECTION: On January 12th, 2022, Staff reported to Monroe incident (Ref. Inspection Number KR22-001). In that inspection Staff stated, "a follow up was not done due to type of inspection that was taking place". Staff reported to the city of Monroe due to an incident and stayed on job site most of the time there.

OPERATORS FIRST RESPONSE: In their response to Inspection Number JS20-033, dated December 21, 2020, the City of Monroe stated: "Monroe has discussed the NOPV and proposed civil penalty with the Director and understands that this discussion serves as the Informal Conference that is the first step in addressing these items. Based on Monroe's understanding of the Director's position on the Probable Violation and the Proposed Civil Penalty, Monroe provides the follow: To resolve the Notice of Amendment related to § 192. 703(b) as cited in Inspection #DLI 8-028, Monroe revised its leak grading and response program to include provisions for rechecking leaks after repair to ensure that the repair was effective and that there are no other leaks remaining. These provisions are modeled after the leak re-check procedures implemented by the City of Lawrenceville. The procedures were revised on December 4, 2020. To address the Proposed Civil Penalty associated with this Probable Violation, Monroe will conduct training in leak grading and leak response with all personnel responsible for performing these activities. This training will be completed by February 1, 2021. Please confirm that this understanding is accurate and advise us of the next

steps to be taken.

SECOND FOLLOW-UP INSPECTION: On June 28th, 2022, Staff reported to the City of Monroe to perform a Methane Emissions Inspection (Ref Inspection Number RS22-021). Staff stated: "At the time of this inspection the City of Monroe had Two (2) previously existing probable violations. These violations were not discussed at the time of this inspection."

OPERATOR SECOND RESPONSE: In their response to Inspection Number RS22-001, dated February 16th, 2023, The City of Monroe states: "On December 4, 2020, the City of Monroe revised its leak grading and response program to include provisions for rechecking leaks after repair to ensure that the repair was effective and that there are no other leaks remaining."

THIRD FOLLOW-UP INSPECTION: On October 4th, 2022, Staff reported to the City of Monroe's Service territory located in Northeast Georgia, in the City of Bishop to conduct a field inspection of the Operator's construction site (Ref Inspection Number KR22-032). In that inspection Staff stated: "At the time of this inspection the City Monroe was under two (2) previously existing probable violation. These violations were not reviewed at the time of this inspection due to being out in the field with crews the entirety of inspection."

OPERATOR THIRD RESPONSE: In their response to Inspection Number KR22-032, dared February 16th, 2023, the City of Monroe stated: "On December 4, 2020, the City of Monroe revised its leak grading and response program to include provisions for rechecking leaks after repair to ensure that the repair was effective and that there are no other leaks remaining."

FOURTH FOLLOW-UP INSPECTION: On February 6th, 2023, Staff reported to the City of Monroe Gas Department to perform an Annual Review of their Distribution Integrity Management Program (DIMP) as required under the PHMSA State Programs Guidelines (Ref Inspection Number RS23-002). In that inspection Staff stated: "At the time of this inspection the City of Monroe Gas Department had One (1) previously existing probable violation. Because this inspection was specifically to perform a review of the Operators DIMP program Staff did not review this item."

OPERATOR FOURTH RESPONSE: In their response to Inspection Number RS23-002, dated February 28th, 2024, the City of Monroe stated: "On December 4, 2020, the City of Monroe revised its leak grading and response program to include provisions for rechecking leaks after repair to ensure that the repair was effective and that there are no other leaks remaining. As stated in the Report on Inspection KR23-007, Staff has determined that this Probable Violation has been addressed; therefore, the City of Monroe requests that it be Cleared. An Informal Conference to discuss the Proposed Civil Penalty associated with this Probable Violation was requested in Monroe's response to the Report on Inspection KR23-007."

FIFTH FOLLOW-UP INSPECTION: On February 27th, 2023, Staff reported to the City of Monroe to perform a Follow Up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number KR23-007) In that inspection Staff stated: "During this inspection KR23-007 Staff reviewed the amended procedures for performing leak re-checks in the City of Monroe's Operator and Maintenance Manual. Staff determined that this violation of Commission Rule 15-9-3-.09 has been addressed, however, the proposed civil penalty has not been addressed. The Operator is directed to contact the Director to discuss the proposed civil penalty. Staff determined that this probable violation cannot be cleared at this time."

OPERATOR FIFTH RESPONSE: In their response to Inspection Number KR23-007, dated August 8th, 2023, the City of Monroe stated: "On December 4, 2020, the City of Monroe revised its leak grading and response program to include provisions for rechecking leaks after repair to ensure that the repair was effective and that there are no other leaks remaining. The City of Monroe reported this in previous letters sent in response RS22-021 and KR22-032. As stated in the Report on Inspection KR23-007, Staff has determined that this Probable Violation has been addressed; therefore, the City of Monroe requests that it be Cleared.

SEVENTH FOLLOW-UP INSPECTION: During inspection (RS23-035) Staff determined that the Operator did amend the procedure that this violation was issued for, however they have not yet addressed the civil penalty which was proposed with this violation. Staff determined that that this violation can be cleared, but the Operator is directed to contact the Director to discuss the proposed civil penalty.

Staff determined that this probable violation can be cleared at this time.

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 Monroe

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37070

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	
☐ 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	$ _____ 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:_____
   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:	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: _____

Response Provided by: _____ Date:_____
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:_____

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 Monroe Natural Gas Department	)	**DOCKET NO. 37070**
	)	
	)	
	)	

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

*Logan Propers, City Administrator
City of Monroe Natural Gas Department
P.O. Box 725
Monroe, GA 30655
lpropes@monroega.gov

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

Respectfully Submitted this 1st day of July 2025:

Cathy Nesbitt

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