COMMISSIONERS

JASON SHAW , Chairman
TIM G. ECHOLS , Vice-Chairman
FITZ JOHNSON
LAUREN "BUBBA" McDONALD
TRICIA PRIDEMORE

FILED
JUN 2 6 2025
EXECUTIVE SECRETARY
GPSC

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

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

244 Washington Street, SW
Atlanta, GA 30334-5701

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

DOCKET# 37034
DOCUMENT# 223155

Docket No. 37034

City of Sylvester Gas System
101 North Main St
Sylvester, GA 31791

REF: Comprehensive Inspection # JH24-012

☒ Certified Mail ☐ Regular Mail ☐ Email

Attention: Mr. Autron Hayes

On February 20, 2023, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JH24-012 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. 37034 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

COMMISSIONERS

JASON SHAW , Chairman
TIM G. ECHOLS , Vice-Chairman
FITZ JOHNSON
LAUREN "BUBBA" McDONALD
TRICIA PRIDEMORE

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

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

244 Washington Street, SW
Atlanta, GA 30334-5701

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

REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JH24-012

OPERATOR: City of Sylvester Gas System

INVESTIGATOR: Jack Hewitt

INSPECTION DATE: February 20, 2024 REPORT MAILED DATE: June 25, 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 Operators plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	AT19-049	12/3/2019

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.727	Abandonment or deactivation of facilities.	JH24-012	2/20/2024
192.615(c)	Each operator shall establish and maintain liaison with appropriate fire, police, and other...	JH24-012	2/20/2024
192.467(d)	Inspection and electrical tests must be made to assure that electrical isolation is adequate.	JH24-012	2/20/2024
192.615(b)(3)	Review employee activities to determine whether the procedures were effectively followed in each...	JH24-012	2/20/2024
192.756	Joining plastic pipe by heat fusion; equipment maintenance and calibration.	JH24-012	2/20/2024

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF SYLVESTER GAS SYSTEM / COMPREHENSIVE
INSPECTION NUMBER JH24-012 / DOCKET NUMBER 37034

From February 19-22, 2024 Staff reported to City of Sylvester Gas System to conduct a comprehensive inspection of the Operators plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192.

During this inspection, the Operator was represented by:
Tyree McGee - Utility Director
Charlie King - Tech 3
Joe Bratcher - Tech 3
Sam Yarley – MGAG/SRCS (Consultant)

Commission Staff was represented by:
Jack Hewitt – Lead Inspector
David Lewis – Pipeline Safety Inspector
Alan Towe – Pipeline Safety Inspector

At the time of this inspection the City of Sylvester Gas System was negotiating a consent agreement with the Director for civil penalties which were proposed in Inspection Number AT18-007.

During this inspection Staff reviewed the City of Sylvester Gas System operations utilizing GA – PHMSA Form 2 (Procedures / Records / Field Observations) Gas Distribution Operator to record the findings of the inspection.
Staff reviewed the City of Sylvester's:

- O&M Manual
- Emergency Plan
- MAOP Procedures and records
- 5-year Patrolling & Leakage records
- 5- year Regulator & Relief Insp.
- 5- year Work orders
- 5- year Corrosion Surveys
- 5- year Atmospheric Corrosion records
- 5- year Odorization Records
- 5- year O.Q. Procedures and records
- 5- year Valve maintenance and records
- 5-year Annual 7100 Reports

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that the City of Sylvester Gas System was in probable violation of the minimum federal safety standards; specifically:

1. §192.615 Emergency plans.
   (b) Each operator shall:
      (3) Review employee activities to determine whether the procedures were effectively followed in each emergency.

   STAFFS COMMENTS: According to the procedure located in the City of Sylvester Emergency Manual, Section IX - Acquainting Appropriate Operating and Maintenance Personnel with Procedures; item number 4 states: "As soon as practical, following each significant event or field exercise that

involves the use of the emergency plan, employee activities shall be reviewed to determine whether the procedures were effectively and appropriately followed."

Staff examined a work order for a leak call at Bridges St. Lot 47 on Sept 23, 2020. The Operators records indicate the work was completed but never reviewed to determine whether the procedures were effectively followed.

PROBABLE VIOLATION: The City of Sylvester Gas System failed to review employee activities following emergency response as required by 192.615(b)(3) and their Emergency Procedures.

2. §192.615 Emergency plans.
   (c) Each operator must establish and maintain liaison with the appropriate public safety answering point (i.e., 9-1-1 emergency call center) where direct access to a 9-1-1 emergency call center is available from the location of the pipeline, as well as fire, police, and other public officials, to:
   (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;
   (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;
   (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and,
   (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

   STAFFS COMMENTS: Staff requested records of liaison meetings and City of Sylvester Gas System could not produce documentation for the CY's 2019, 2020, 2021 and 2022.

   PROBABLE VIOLATION: The City of Sylvester Gas System failed to demonstrate that they conducted their annual liaison as required by 192.615(c).

3. §192.727 Abandonment or deactivation of facilities.
   (b) Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.

   STAFFS COMMENTS: The City of Sylvester O&M Manual, Section 13R - Abandonment or deactivation of Facilities states: Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.

   Staff examined a work order for McDonald St. dated August 5, 2021 to abandon a galvanized service line. There was no documentation of purging nor sealing of the pipe, and the Operator did not document the volume of gas found in the pipeline.

   PROBABLE VIOLATION: The City of Sylvester Gas System failed to demonstrate that they abandoned their pipeline facilities according to the requirements of §192.727(b) and their O&M procedures.

4. §192.756 Joining plastic pipe by heat fusion; equipment maintenance and calibration.
Each operator must maintain equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints.

   STAFFS COMMENTS: Staff examined a Friatec fusion machine and found no documentation of maintenance records. City of Sylvester Operations & Maintenance Manual - Version 2024.3 - September 6, 2024 in 13-CC Joining Plastic Pipe by Heat Fusion - Equipment Maintenance and Calibration [192.756], states: (a) City of Sylvester will maintain equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints.

   PROBABLE VIOLATION: The City of Sylvester Gas System failed to demonstrate that they maintained their plastic pipe fusion machine according to manufacturer's recommendation according to §192.756 and their O&M Manual.

5. 49 CFR §192.467 - External corrosion control: Electrical isolation.
(d) Inspection and electrical tests must be made to assure that electrical isolation is adequate.

   STAFF COMMENTS: During this inspection Staff found records indicating the Operator's casings located at Industrial Blvd. East and West were reported as being shorted. This violation was noted in the comprehensive inspection #AT18-007. Also, Staff found that the Operators casings have been reported as being shorted to their cathodic protection system in their CY 2023 CP Survey dated August 14, 2023.

   PROBABLE VIOLATION: The City of Sylvester Gas System failed to assure that electrical isolation was adequate at their metallic casings according to 192.467(d).

PROPOSED CIVIL PENALTY

Under Commission Rule 515-9-1.01, by virtue of the authority vested in the Commission by law and pursuant to orders issued by the Commission on May 4, 1967, July 6, 1967, April 23, 1968, and October 29, 1970, all Rules and Regulations prescribed by the United States Department of Transportation applicable to the "Transportation of Natural and Other Gas by Pipeline: Minimum Safety Standards" (C.F.R. 49, Parts 191 and 192) are by this Rule made the Rules and Regulations of the Georgia Public Service Commission for the safe installation and operation of all natural gas transmission and distribution facilities by companies subject to the jurisdiction of the Commission within this State.

Under Commission Rule 515-9-3-.08 (Written Formal Notice of Violation), the Commission may propose a civil penalty in conjunction with this notice of probable violation. Further, The City of Sylvester Gas System is subject to civil penalties under O.C.G.A. § 46-2-91(b) which states that: Any operator which violates any rule or regulation of the commission prescribed pursuant to subsection (i) of Code Section 46-2-20, or which fails, neglects, or refuses to comply with any order after notice thereof, shall be liable to a penalty not to exceed the maximum penalties provided for in 49 C.F.R. Section 190.223.

Staff has reviewed the circumstances surrounding the probable violations cited in this report and has recommended the civil penalty listed below. Please note that this recommended amount is less than the amount authorized by Georgia law.

Item #	Code / Rule	Description	Proposed Penalty
2	§192.615(c)	Liaison	$2,500.00
TOTAL PROPOSED PENALTY			$2,500.00

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.

CITY OF SYLVESTER GAS SYSTEM / COMPREHENSIVE
INSPECTION NUMBER JH24-012 / DOCKET NUMBER 37034

From February 19-22, 2024 Staff reported to City of Sylvester Gas System to conduct a comprehensive inspection of the Operators plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192.

During this inspection, the Operator was represented by:
Tyree McGee - Utility Director
Charlie King - Tech 3
Joe Bratcher - Tech 3
Sam Yarley – MGAG/SRCS (Consultant)

Commission Staff was represented by:
Jack Hewitt – Lead Inspector
David Lewis – Pipeline Safety Inspector
Alan Towe – Pipeline Safety Inspector

At the time of this inspection the City of Sylvester Gas System was negotiating a consent agreement with the Director for civil penalties which were proposed in Inspection Number AT18-007.

During this inspection Staff reviewed the City of Sylvester Gas System operations utilizing GA – PHMSA Form 2 (Procedures / Records / Field Observations) Gas Distribution Operator to record the findings of the inspection.
Staff reviewed the City of Sylvester's:

- O&M Manual
- Emergency Plan
- MAOP Procedures and records
- 5-year Patrolling & Leakage records
- 5- year Regulator & Relief Insp.
- 5- year Work orders
- 5- year Corrosion Surveys
- 5- year Atmospheric Corrosion records
- 5- year Odorization Records
- 5- year O.Q. Procedures and records
- 5- year Valve maintenance and records
- 5-year Annual 7100 Reports

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that the City of Sylvester Gas System was in probable violation of the minimum federal safety standards; specifically:

1. §192.615 Emergency plans.
   (b) Each operator shall:
      (3) Review employee activities to determine whether the procedures were effectively followed in each emergency.

   STAFFS COMMENTS: According to the procedure located in the City of Sylvester Emergency Manual, Section IX - Acquainting Appropriate Operating and Maintenance Personnel with Procedures; item number 4 states: "As soon as practical, following each significant event or field exercise that

involves the use of the emergency plan, employee activities shall be reviewed to determine whether the procedures were effectively and appropriately followed."

Staff examined a work order for a leak call at Bridges St. Lot 47 on Sept 23, 2020. The Operators records indicate the work was completed but never reviewed to determine whether the procedures were effectively followed.

PROBABLE VIOLATION: The City of Sylvester Gas System failed to review employee activities following emergency response as required by 192.615(b)(3) and their Emergency Procedures.

2. §192.615 Emergency plans.
   (c) Each operator must establish and maintain liaison with the appropriate public safety answering point (i.e., 9-1-1 emergency call center) where direct access to a 9-1-1 emergency call center is available from the location of the pipeline, as well as fire, police, and other public officials, to:
   (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;
   (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;
   (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and,
   (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.

   STAFFS COMMENTS: Staff requested records of liaison meetings and City of Sylvester Gas System could not produce documentation for the CY's 2019, 2020, 2021 and 2022.

   PROBABLE VIOLATION: The City of Sylvester Gas System failed to demonstrate that they conducted their annual liaison as required by 192.615(c).

3. §192.727 Abandonment or deactivation of facilities.
   (b) Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.

   STAFFS COMMENTS: The City of Sylvester O&M Manual, Section 13R - Abandonment or deactivation of Facilities states: Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.

   Staff examined a work order for McDonald St. dated August 5, 2021 to abandon a galvanized service line. There was no documentation of purging nor sealing of the pipe, and the Operator did not document the volume of gas found in the pipeline.

   PROBABLE VIOLATION: The City of Sylvester Gas System failed to demonstrate that they abandoned their pipeline facilities according to the requirements of §192.727(b) and their O&M procedures.

4. §192.756 Joining plastic pipe by heat fusion; equipment maintenance and calibration.
Each operator must maintain equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints.

   STAFFS COMMENTS: Staff examined a Friatec fusion machine and found no documentation of maintenance records. City of Sylvester Operations & Maintenance Manual - Version 2024.3 - September 6, 2024 in 13-CC Joining Plastic Pipe by Heat Fusion - Equipment Maintenance and Calibration [192.756], states: (a) City of Sylvester will maintain equipment used in joining plastic pipe in accordance with the manufacturer's recommended practices or with written procedures that have been proven by test and experience to produce acceptable joints.

   PROBABLE VIOLATION: The City of Sylvester Gas System failed to demonstrate that they maintained their plastic pipe fusion machine according to manufacturer's recommendation according to §192.756 and their O&M Manual.

5. 49 CFR §192.467 - External corrosion control: Electrical isolation.
(d) Inspection and electrical tests must be made to assure that electrical isolation is adequate.

   STAFF COMMENTS: During this inspection Staff found records indicating the Operator's casings located at Industrial Blvd. East and West were reported as being shorted. This violation was noted in the comprehensive inspection #AT18-007. Also, Staff found that the Operators casings have been reported as being shorted to their cathodic protection system in their CY 2023 CP Survey dated August 14, 2023.

   PROBABLE VIOLATION: The City of Sylvester Gas System failed to assure that electrical isolation was adequate at their metallic casings according to 192.467(d).

PROPOSED CIVIL PENALTY

Under Commission Rule 515-9-1.01, by virtue of the authority vested in the Commission by law and pursuant to orders issued by the Commission on May 4, 1967, July 6, 1967, April 23, 1968, and October 29, 1970, all Rules and Regulations prescribed by the United States Department of Transportation applicable to the "Transportation of Natural and Other Gas by Pipeline: Minimum Safety Standards" (C.F.R. 49, Parts 191 and 192) are by this Rule made the Rules and Regulations of the Georgia Public Service Commission for the safe installation and operation of all natural gas transmission and distribution facilities by companies subject to the jurisdiction of the Commission within this State.

Under Commission Rule 515-9-3-.08 (Written Formal Notice of Violation), the Commission may propose a civil penalty in conjunction with this notice of probable violation. Further, The City of Sylvester Gas System is subject to civil penalties under O.C.G.A. § 46-2-91(b) which states that: Any operator which violates any rule or regulation of the commission prescribed pursuant to subsection (i) of Code Section 46-2-20, or which fails, neglects, or refuses to comply with any order after notice thereof, shall be liable to a penalty not to exceed the maximum penalties provided for in 49 C.F.R. Section 190.223.

Staff has reviewed the circumstances surrounding the probable violations cited in this report and has recommended the civil penalty listed below. Please note that this recommended amount is less than the amount authorized by Georgia law.

Item #	Code / Rule	Description	Proposed Penalty
2	§192.615(c)	Liaison	$2,500.00
TOTAL PROPOSED PENALTY			$2,500.00

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 Sylvester

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37034

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	$_____
☐ 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: _____

_____

_____

_____

_____

_____

_____

_____

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 Sylvester Gas System	)	**DOCKET NO. 37034**
	)	
	)	
	)	

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

*Autron Hayes, City Manager
City of Sylvester Gas System
101 North Main Street
Sylvester, GA 31791
ahayes@cityofsylvester.com

*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 30334P

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL™

7011 2970 0003 0172 3720

7011 2970 0003 0172 3720

U.S. Postal Service™

CERTIFIED MAIL™ RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com®

OFFICIAL USE

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To *Autron Hayes, City Manager

Street, Apt. No., or PO Box No. City of Sylvester Gas System 101 North Main Street

City, State, ZIP+ Sylvester GA 31791

DN 37034-223155-JH24012

PS Form 3800, August 2006 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

*Autron Hayes, City Manager
City of Sylvester Gas System
101 North Main Street
Sylvester GA 31791
DN 37034-223155
JH 24-012

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X ☐ Agent ☐ Addressee

B. Received by (Printed Name) C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7011 2970 0003 0172 3720

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540