Atlanta Gas Light

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July 1st, 2025

Ms. Michelle Thebert
Director, Office of Pipeline / Facilities Safety
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334-5701

Dear Ms. Thebert,

This letter provides an update to our original response dated February 8, 2017 to the probable violations and letter of concerns presented in the Georgia Public Service Commission (GPSC) pipeline safety reports numbered; AT 16-046, AT 16-048, JL 17-015, and JL 17-017. The reports were associated with various comprehensive inspections where specific concern(s) with shorted casings were identified.

As a result of the audits, GPSC Staff identified the following Notice of Probable Violations and Letters of Concerns.

Notice of Probable Violations

GPSC AT 16-048 – Corporate – 10/4/16 (Docket #37024-165738)

49 CFR §192.467(c)

During the inspection of the Cumming Service Center (Inspection Number AT 16- 046), Staff found that the Operator has 14 shorted casings that have not been cleared in accordance with their procedures

Probable Violation: The Operator failed to electrically isolate their pipeline from metallic casings in accordance with their procedures where practical.

GPSC JL 17-015 – Valdosta – 3/13/17 (Docket #37024-168753)

49 CFR §192.465(d)

Staff reviewed the Operator's Cathodic Protection records and discovered that the AGL - Valdosta Service Center has identified twenty-nine (29) "shorted casings". The operator was unable to provide Staff with any records documenting any attempt to clear/remediate the shorted casings. AGL - Valdosta personnel did provide records to demonstrate that each shorted casing has been leak surveyed on a quarterly basis.

Probable Violation: The Operator could not demonstrate that they had taken prompt remedial action to correct the deficiencies related to 29 shorted casings which were indicated by their CP monitoring.

Letter of Concern

GPSC AT 16-046 – Cumming – 9/15/16 (Docket #37024-165737)

> During the inspection Staff found that the Operator currently has 14 shorted casings that have not had corrective action taken in accordance with their procedures found in Division III, Section 7.24. Staff determined this issue would be more appropriately addressed at the AGLC corporate level.

GPSC JL 17-015 – Valdosta – 3/13/17 (Docket #37024-168753)

> 49 CFR §192.467(d)
>
> During the inspection, Staff discovered multiple casings that were not being checked for electrical isolation. The Operator personnel stated that some of these casings did not have a vent stack, test leads, or test stations to observe the cathodic protection potential at each casing.
>
> Subsequent to this inspection, Staff found the issue of shorted casings was already being addressed with the Operator's Corporate Headquarters under Inspection Number AT 16-048. Staff expressed concern to the Operator that they do not have records to show that testing has been performed, and the isolation is effective. Staff requests that AGLC identify and provide staff with a listing of all casings for the Valdosta Service Center that do not have a means to be inspected or tested for electrical isolation.

GPSC JL 17-017 Vidalia – 4/17/17 (Docket #37024-169278)

> 49 CFR §192.467(d)
>
> During the inspection, Staff discovered multiple casings that were not being checked for electrical isolation. The Operator personnel stated that some of these casings did not have a vent stack, test leads, or test stations to observe the cathodic protection potential at each casing.
>
> Subsequent to this inspection, Staff found the issue of shorted casings was already being addressed with the Operator's Corporate Headquarters under Inspection Number AT 16-048. Staff expressed concern to the Operator that they do not have records to show that testing has been performed, and the isolation is effective. Staff requests that AGLC identify and provide staff with a listing of all casings for the Vidalia Service Center that do not have a means to be inspected or tested for electrical isolation.

In response, the Company developed a remediation program to resolve issues with a total of 711 identified casings that have either been identified as shorted (259), or unable to determine if a short exists due to being unreadable (452). The originally stated date for remediation of all 711 casings was by July 1, 2025. A breakdown by AGLC Service area of the total (711) by shorted vs. unreadable and aboveground vs. belowground is depicted in the following table was provided to the GPSC:

Service Center	Above Ground Shorted	Below Ground Shorted	Above Ground Unreadable	Below Ground Unreadable
Athens	6	20	13	5
Atlanta	1	1	102	29
Augusta	0	0	20	74
Brunswick	0	10	0	29
Carrollton	0	7	1	0
Cherokee	6	13	3	2
Clayton	0	17	0	5
Conyers	0	1	4	1
Cumming	1	0	15	4
Griffin	2	9	0	0
Gwinnett	3	7	8	11
Hall County	3	11	0	1
Jesup	0	13	0	3
Macon	1	22	37	0
Marietta	4	9	2	1
Milledgeville	0	5	0	6
Newnan	0	0	8	0
Peachtree	2	0	25	9
Rome	3	28	6	5
Savannah	0	6	0	6
Valdosta	0	8	0	9
Vidalia	2	24	0	6
Waycross	0	14	0	2

Of the original 711 casings, AGLC has completed remediation of 701 casings by the original July 1st, 2025 target date. Due to extenuating circumstances, AGLC still has 10 casings requiring remediation. Remediation information for the 701 completed casings will be supplied through our SharePoint, as well as any follow-up information needed by Staff.

The 10 remaining casings are summarized in the following table:

Service Center	Casing #	Estimated Remediation Date
Augusta	222	9/4/2025
Brunswick	240	8/6/2025

Service Center	Casing #	Estimated Remediation Date
Clayton	563	8/11/2025
Peachtree	474	7/28/2025
Peachtree	475	7/28/2025
Rome	642	7/28/2025
Savannah	646	7/28/2025
Vidalia	330	8/4/2025
Vidalia	672	8/4/2025
Vidalia	679	8/4/2025

For a more detailed view of the history, updates, and remaining activities for each of these 10 casings, please see the enclosed document titled “AGLC Shorted Casings Program - Remaining Casing Details”.

If you have any questions or need additional information, please contact me by phone at (770) 828-4091 or email at jfcaubo@southernco.com.

Sincerely,



Joseph Caubo
Manager, Compliance & Quality Assurance

Enclosures

AGLC Shorted Casings Program - Remaining Casing Details