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EXECUTIVE SECRETARY
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BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION

IN RE: } DOCKET NO. 56007

STAFF'S SECOND SET OF DATA REQUESTS TO
SOUTHERN COMPANY GAS / ATLANTA GAS LIGHT COMPANY
REGARDING THE REPORTABLE INCIDENT AT 2175 SAVANNAH HIGHWAY
IN JESUP GEORGIA ON APRIL 15, 2024.

DOCKET# 56007
DOCUMENT# 223992

TO: WALT FERRELL
PRESIDENT AND CEO
ATLANTA GAS LIGHT COMPANY
10 PEACHTREE PLACE NE
ATLANTA, GA 30309

COMES NOW the Georgia Public Service Commission Staff ("Staff") and, pursuant to the authority vested in it by the Georgia Public Service Commission ("Commission") pursuant to O.C.G.A. § 46-2-57, herein propounds the following interrogatories and requests for production of documents (collectively, "data requests"), to be answered under oath by Southern Company Gas / Atlanta Gas Light Company, ("SCG", "AGLC", or "Company") or its designated representatives. Pursuant to Commission Utility Rule 515-2-1-.04, Staff requests that an original and five (5) copies be filed with the Executive Secretary of the Commission. If there are any **Trade Secret responses**, please provide an original and five (5) copies in accordance with the procedures under Commission Utility Rule 515-3-1-.11. **Accompanied therewith shall be an electronic version of the filing, which shall be made on a CD ROM containing an electronic version of its filing in Microsoft Word® for text documents or Excel® for spreadsheets.**

Please provide responses on or before 4:00 p.m. on Thursday, October 20th, 2025.

INSTRUCTIONS

a) These requests shall be deemed to be continuing. The data related to the Positive Response Information System responses shall provided no later than the 7th day of each month for the previous calendar month.

b) All information is to be divulged that is within the knowledge, possession, control, or custody of the Respondent or may be reasonably ascertained thereby.

c) As used herein the "document" included, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telephone calls, meetings or other communications, bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys, work sheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form, stored or contained in or on whatever medium including computerized memory or magnetic media.

Information Request

Docket No. 56007

STAFF'S REQUEST FOR INFORMATION REGARDING THE REPORTABLE INCIDENT AT 2175 SAVANNAH HIGHWAY IN JESUP GEORGIA ON APRIL 15, 2024.

Staff's request for information in regard to Southern Company Gas / Atlanta Gas Light Company's letter which was submitted on August 28, 2025, titled: Follow up from informal conference with GPSC – Atlanta Gas Light (Jesup Service Center)/Incident Investigation Inspection #JB25-001/Docket #56007.

STF 2-1 Please provide a copy of the enhanced reporting procedure that integrates regulatory compliance staff earlier into the reporting process.

STF 2-2 Please provide a listing of the members of the RISE (Revolutionizing Innovation Safety and Excellence) task force. This list should include each member's title / Position, timeframe for the employees' service with the Company, and qualifications for participating in this task force.

STF 2-3 Please provide a list of the procedure(s) that were reviewed by the RISE task force.

STF 2-4 Did the RISE task force create any documentation for their evaluation of the Company's emergency response repair processes and related training? If so, please provide copies for Staffs review. If not, please explain why not.

STF 2-5 In the referenced letter the Company stated:

> *"AGLC is confident that employees handling one-person service repairs have the necessary skills and that we equip them with the essential tools and technology to carry out repairs safely and effectively."*

However, in its response to DN 56007 STF 1-19, the Company acknowledged that Field Specialist A vehicles are not equipped with a rescue harness/lifeline or respirators.

(a) Given this apparent discrepancy and considering the RISE Task Force's conclusion that no procedural changes were necessary, does AGLC currently direct Field Specialist A technicians to enter below-ground excavations or trenches without the emergency safety equipment required under 49 CFR §192.605(b)(9)?

(b) If so, how does the Company justify this practice considering the regulation's requirement to,

"Take adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapor or gas, and make available, when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line"?

(c) What criteria does AGLC use to determine when such equipment is "needed at the excavation"?

(d) What steps, if any, is AGLC taking to ensure full compliance with §192.605(b)(9) going forward?

STF 2-6 Please provide a copy of the First Responder Decision Tree (Quick Reference Guide) referenced in the August 28, 2025, response letter.

STF 2-7 In the referenced NOPV for 49 CFR §192.723(b)(2) – Distribution System: Leakage Survey, the Company stated that it had "checked the area" in question. However, this response does not appear to address whether other areas of the system may also have been missed or inadequately surveyed for leaks.

(a) How does this response provide assurance to the Public Service Commission ("PSC") that the issue was isolated and not indicative of broader non-compliance across the distribution system?

(b) What specific measures will AGL implement to ensure future compliance with §192.723(b)(2).

(c) Please clarify how AGL intends to verify that all applicable areas are surveyed within the required timeframes and that no segments are inadvertently omitted.

STF 2-8 In the referenced NOPV concerning 49 CFR §192.471(a)(2)- Atmospheric Corrosion Monitoring, the Company stated that it hard "checked the area" in question. However, this response does not appear to address whether other areas of the system may have also been missed or inadequately monitored for atmospheric corrosion.

(a) How does this response provide assurance to the PSC that the issue was isolated and not indicative of broader non-compliance across the system?

(b) Furthermore, what specific measures will AGL implement to ensure future compliance with §192.471(a)(2).

(c) Please clarify how AGL intends to guarantee that all applicable segments of its system are monitored in accordance with these federal requirements.

STF 2-9 On page 2 of AGLC's August 28, 2025 letter titled "Follow up from informal conference with GPSC – Atlanta Gas Light (Jesup Service Center)/Incident Investigation Inspection #JB25-001/Docket #56007" it states, *"We checked this area for any additional unknown service lines and found none."*

(a) Please provide all records (e.g., maps, notes, work orders, etc.) that AGL has related to checking this area.

(b) Additionally, what was the scope of the undertaking? For example, did it cover a 2-mile radius from the incident, a visual inspection on foot or by vehicle, or a limited area such as two houses on each side?

STF 2-10 Please provide all information regarding AGL's compliance with Commission Rule 515-9-1.06-Incident Notification from January 2015 to the present. This should include, but is not limited to:
(a) The date and time of each incident,
(b) The name and title of the AGL employee who notified the PSC,
(c) The name of the PSC employee who was notified,
(d) The time the PSC was notified, and
(e) If applicable, the reason for any non-compliance by AGL.

STF 2-11 Please provide the certification booklets that AGL employees get for first responder training.

STF 2-12 Please provide the "First Responder Refresher Training" mentioned On page 3

STF 2-13 Please provide copies of the training videos mentioned on Page 3 AGLC's August 28, 2025 letter titled "Follow up from informal conference with GPSC – Atlanta Gas Light (Jesup Service Center)/Incident Investigation Inspection #JB25-001/Docket #56007".

STF 2-14 Please explain in more detail what "cross-functional training with below-ground crews" means. Also, please identify:
(a) Which employees will be cross-trained? (Please provide a copy of their job description)
(b) Which employees will be providing the training? (Please provide a copy of their job description)
(c) How will the training be evaluated?

STF 2-15 Please provide the user manual or guide for the Long Handle Mustang Squeezers.

STF 2-16 Who will be training AGL employees on the Long Handle Mustang Squeezers? Please provide the name, title, employer, and employment dates of the person that will be training others on the long squeezers.

STF 2-17 Please explain what *"Restrictions are in place to prevent the removal or adjustment of the vise grip/squeezer tool..."*.

STF 2-18 It appears that AGL has three separate means of an employee seeking assistance during an emergency:

1. First Responder Decision Tree – directing the employee to call a supervisor or fellow employee,

2. Southern Company's Lone Worker Mobile App – which connects the employee to the Physical Security Operations Centers (PSOCs), and
3. Dedicated Emergency Response Phones.

Please provide the names and titles of the individuals or teams responsible for responding to each of the above emergency communication methods.

STF 2-19 Regarding the above assistance lines discussed in STF 2-19 above:

(a) Please explain why the Company requires triplicate phone/emergency coverage for procedures, given that the RISK task force stated it:

> *"...did not recommend changes to the Company's procedures but instead identified ways to clarify the conditions under which employees could work alone and when to ask for help."*

(b) If no procedural changes were recommended, what is the justification for implementing this additional layer of emergency protection?

STF 2-20 Please provide all information regarding the clarified conditions discussed on Page 2 of AGLC's August 28, 2025 letter titled "Follow up from informal conference with GPSC – Atlanta Gas Light (Jesup Service Center)/Incident Investigation Inspection #JB25-001/Docket #56007". whereby employees could work alone and ask for help. For each clarified condition, please include the following:

(a) The condition,
(b) How the condition was chosen, and
(c) How the condition will prevent future re-occurrence of the events of April 15, 2024.

STF 2-21 Has an initial survey of the cathodic protection system at 2175 Savannah Highway, Jesup, GA 31515, ever been conducted? If so, please provide documentation indicating when the survey took place.

BEFORE THE GEORGIA PUBLIC SERVICE COMMISSION
STATE OF GEORGIA

IN RE: **Atlanta Gas Light Company**	)	**DOCKET NO. 56007**

CERTIFICATE OF SERVICE

I hereby certify that the *Staff's Second Set of Data Requests* in Docket No. 56007 were filed with the Commission's Executive Secretary and a copy of the same was served upon all parties and persons listed below via electronic mail as indicated by an asterisk. I further certify that the *Atlanta Gas Light Company* was served a hard copy of the above-stated document by United States Mail.

*Sallie Tanner, Executive Secretary
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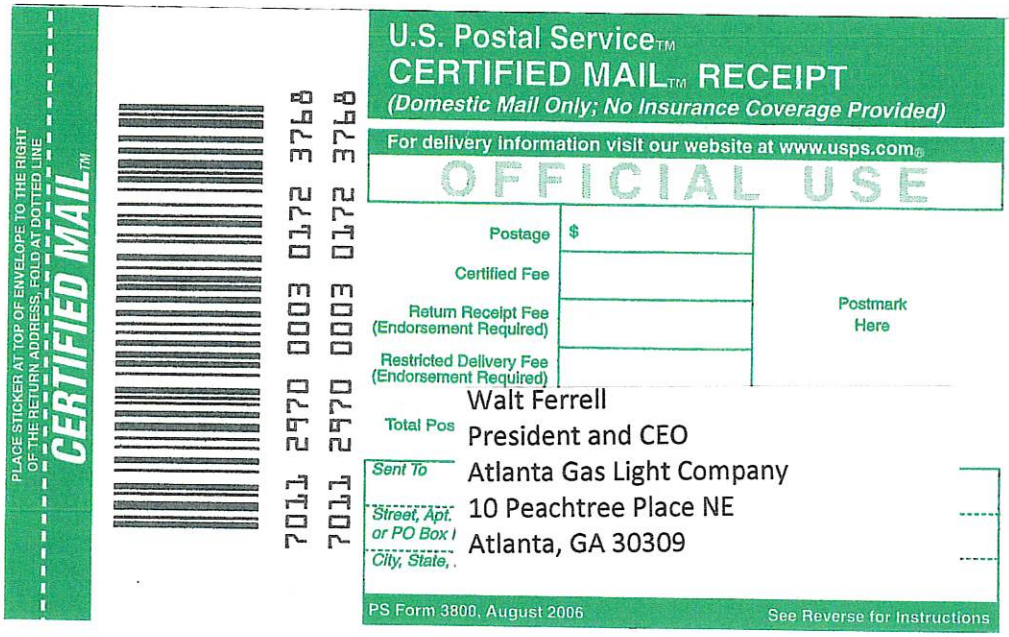
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Respectfully Submitted this 17th day of September 2025:

Cathy Nesbitt

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



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City, State,	10 Peachtree Place NE
	Atlanta, GA 30309

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1. Article Addressed to:

Walt Ferrell
President and CEO
Atlanta Gas Light Company
10 Peachtree Place NE
Atlanta, GA 30309

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