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Docket No. 37061

DOCKET# 37061
DOCUMENT# 225783

City of LaFayette Utilities
PO Box 89
LaFayette, GA 30728

ATTN: David Hamilton

On March 11, 2026 a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an informal conference as requested by the gas operator. The enclosed inspection report numbered JB26-002 is provided for your information and file.

Please submit a written response outlining the proposed mitigation measures to this inspection as specified in the attached report by U.S. Mail or e-mailing me at michellet@psc.state.ga.us. Please refer to Docket No. 37061 in your response.

Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle Thebert
Michelle Thebert
Director, Office of Pipeline/Facilities Safety

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JB26-002

OPERATOR: City of LaFayette Utilities

INVESTIGATOR: Jeff Baggett

INSPECTION DATE: March 11, 2026 REPORT MAILED DATE: March 12, 2026

Any questions concerning this report may be directed to the above address or by telephoning (404) 463-6526.

1. PURPOSE OF INSPECTION

To conduct an informal conference regarding the previously existing probable violations which were issued in Inspection Number JS19-013 in regard to the uprating of the Operators Skyline Heights system.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.619(a)	No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum...	JS19-013	3/25/2019
192.553(a)(1)	At the end of each incremental increase, the pressure must be held constant while the entire...	JS19-013	3/25/2019
192.557(b)(1)	Before increasing operating pressure above the previously established maximum allowable operating...	JS19-013	3/25/2019
192.467(c)	Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically...	JS19-013	3/25/2019
192.553(b)	Records. Each operator who uprates a segment of pipeline shall retain for the life of the segment...	JS19-013	3/25/2019
192.553(d)	Limitation on increase in maximum allowable operating pressure. Except as provided in §192.555(c)...	JS19-013	3/25/2019
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT22-016	5/9/2022

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF LAFAYETTE UTILITY DEPARTMENT / INFORMAL CONFERENCE
INSPECTION NUMBER JB26-002 / DOCKET NUMBER 37061

On March 11, 2026, the Facilities Protection Unit Supervisor reported to the City of LaFayette Utility Department to conduct an informal conference regarding the previously existing probable violations which were issued in Inspection Number JS19-013 in regard to the uprating of the Operators Skyline Heights system.

During this informal conference the Operator was represented by:
David Hamilton – City Manager
Duran Rowls - Gas Department Foreman
Maurice Chaney - MGAG/SRCS (Consultant)

Commission Staff was represented by:
Jeff Baggett – FPU Supervisor / Lead Inspector
Eric Atkins – Pipeline Safety Inspector
Daphne Jones - Pipeline Safety Inspector
Ed Luebke – Pipeline Safety Inspector

At the time of this informal conference, the City of LaFayette Utility Department remained under five previously identified probable violations of 49 CFR (§192.553(a)(1); §192.553(b); §192.553(d); §192.557(b)(1); and §192.619(a)), issued under Inspection Number JS19-013 and pertaining to the uprating of the Skyline Heights system.

These probable violations were most recently evaluated under Follow-up Inspection Number EA25-041. The Operator had not received the follow-up report prior to the conference. The PFU Supervisor advised the Operator that the follow-up inspection recommended elevating the uprating-related violations to the FPU Supervisor and Director for determination of appropriate resolution. This recommendation formed the basis for convening the informal conference.

The FPU Supervisor informed the Operator that, based on the circumstances surrounding the uprating activities, the most appropriate and probable course of resolution would be for the City of LaFayette to submit a request for a waiver of the applicable requirements under 49 CFR Subpart K, in accordance with the special permit procedures set forth in 49 CFR §190.341(c).

The Operator was directed to submit their special permit or waiver request to the FPU Director within 60 days of the Operator's receipt of this report. (This request should also be filed under Docket Number 37061) The Operator was further advised that, pursuant to Section 3.3.2 of the PHMSA State Program Guidelines, the FPU Director is required to forward such a request to PHMSA for their review.

The Operator was advised that within 45 days of receipt of this report, they must notify the FPU Director whether it intends to pursue a waiver request. Should the Operator decline to submit a waiver request, Staff will initiate a procedural and scheduling order for a Commission hearing regarding the outstanding probable violations.

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No ☐

Operator Name: City of LaFayette

Docket Number: 37061

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 LaFayette Utilities	)	**DOCKET NO. 37061**
	)	
	)	
	)	

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

*David Hamilton, City Manager
City of LaFayette Utilities
P.O. Box 89
LaFayette, GA 30728
dhamilton@cityoflafayettega.org

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

Respectfully Submitted this _____ day of March 2026:

Cathy Nesbitt

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