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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 No. 37061

DOCKET# 37061
DOCUMENT# 225784

City of LaFayette Utilities
PO Box 89
LaFayette, GA 30728

ATTN: David Hamilton

On September 15, 2025 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 EA25-041 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: EA25-041

OPERATOR: City of LaFayette Utilities

INVESTIGATOR: Eric Atkins

INSPECTION DATE: September 15, 2025 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 a follow-up inspection of the Operators previously existing probable violations.

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

Cleared on 9/15/2025

Violation	Description	Inspection#	Date
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	JS19-013	3/25/2019
199.241	Training for supervisors.	AT19-039	10/17/2019
199.105(c)(6)	The operator shall randomly select a sufficient number of covered employees for testing during...	AT19-039	10/17/2019
199.113(c)	Supervisory Personnel Training (Drug)	AT19-039	10/17/2019

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF LAFAYETTE UTILITY DEPARTMENT / FOLLOW-UP INSPECTION
INSPECTION NUMBER EA25-041 / DOCKET NUMBER 37061

On September 15, 2025, Pipeline Safety Staff reported to the City of LaFayette Utility Department to perform a follow-up inspection of the Gas Department's previously existing probable violations.

During this inspection, the Operator was represented by:
Duran Rowlls - Gas Department Foreman
Maurice Chaney - MGAG/SRCS (Consultant)

Commission Staff was represented by:
Eric Atkins - Lead Inspector
Daphne Jones - Pipeline Safety Inspector

At the time of this inspection the City of LaFayette Utility Department was under ten previously existing probable violations. Staff reviewed these violations with the Operator and determined that:

PROBABLE VIOLATION CLEARED

1. In regard to the probable violation of 49CFR §192.465(d) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

   "The City of LaFayette Gas Department's Operations & Maintenance manual states: 'the city of LaFayette will take prompt remedial action to correct any deficiencies indicated by the monitoring.'

   During this inspection (JS19-013) Staff found that the Villanow Bridge test station has been below criteria for 5 months. Staff also found that the Operator has approximately 12 bare steel services (installed after 1971) that do not meet their cathodic protection criteria level of -.850 mV.

   PROBABLE VIOLATION: The Operator failed to take prompt remedial action to address cathodic protection issues as required in Part 192.465(d)."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

   "The cathodic protection at the Villanow Bridge test station is currently at an acceptable level. LaFayette's records indicate that there were at one time twelve bare, unprotected services. Five of these services have been replaced or inserted. Cathodic protection has been installed on the remaining seven and LaFayette will replace or insert these services by January 31, 2020."

   FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

   "At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

"LaFayette has not been able to replace or insert the remaining seven bare, unprotected services due to company restrictions associated with COVID-19. LaFayette will replace or insert these services as soon as possible and will advise Staff when the schedule can be confirmed."

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

"LaFayette has not been able to replace or insert the remaining seven bare, unprotected services due to company restrictions associated with COVID-19. LaFayette will replace or insert these services as soon as possible and will advise Staff when the schedule can be confirmed."

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"The cathodic protection at the Villanow Bridge test station is currently at an acceptable level. LaFayette's records indicate that there were at one time twelve bare, unprotected services. Five of these services have been replaced or inserted. Cathodic protection has been installed on the remaining seven. Restrictions associated with COVID-19 have delayed LaFayette's addressing the remaining services. LaFayette will replace or insert these services by August 31, 2020."

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) the Operator informed Staff that due to the constant wet weather they had not been able to replace or insert the remaining seven bare, unprotected services. Once weather conditions improve the work will be scheduled."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette has not been able to replace or insert the remaining seven bare, unprotected services due to company restrictions associated with COVID-19. LaFayette will replace or insert these services as soon as possible and will advise Staff when the schedule can be confirmed."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette has eliminated all bare steel services from its system."

SIXTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette has eliminated all bare steel services from its system."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041), Staff reviewed the (7) work orders (23035, 25590, 25679, 23037, 24697, 25590 and 20853) from CY2019 through CY2021 submitted by the City of LaFayette Gas Department and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

2. In regard to the probable violation of 49CFR §199.105(c)(6) which was cited in Inspection Number AT19-039; in that inspection Staff stated:

"During this inspection Staff reviewed Operator records that indicated they had only performed 4 random test in calendar year 2018 and had a total of 12 covered employees.

PROBABLE VIOLATION: Operator failed to perform their random drug testing at a minimum of 50 percent for calendar year 2018 that was established by the Administrator."

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

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039 that was filed with the Public Service Commission on September 24, 2020, the Operator stated:

"Lafayette has requested an Informal Conference with the Director to discuss the NOPV and proposed civil penalty. Lafayette also provides the following response to the Probable Violation associated with the Proposed Civil Penalty:

LaFayette has contracted with a different provider for its random drug testing and believes this change will ensure the appropriate percentage of Covered Employees are randomly tested."

FIRST FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"LaFayette has not received the Report on Inspection AT19-039 and will respond upon receipt."

SECOND FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) Staff asked the Operator if they were able to provide any status to this issue that was brought up during the AT19-039 Drug & Alcohol inspection. The Operator informed Staff that they were using a service provided by Lab Corp that did the computer-based random selection process for LaFayette Gas Department covered employees. After the Drug & Alcohol inspection they decided to change from Lab Corp. to C.H.I. Memorial. The Operator believes this change in service agent will help ensure the appropriate percentage of covered employees will be randomly tested."

Because the Operator has requested an informal conference with the Director in regard to the proposed civil penalty for this item this violation was not cleared.

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette has contracted with C.H.I. Memorial as stated."

THIRD FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated

"LaFayette has contracted with a different provider for its random drug testing to ensure the appropriate percentage of Covered Employees are randomly tested."

FOURTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette has contracted with a different provider for its random drug testing to ensure the appropriate percentage of Covered Employees are randomly tested."

FIFTH FOLLOW-UP INSPECTION: During this inspection (EA25-041), Staff reviewed the documentation for CY2021, 2022, 2023 and 2024 of random drug testing submitted by the City of LaFayette Gas Department and found that it adequately addresses this violation. Staff also found that the Operator settled the proposed civil penalty for this violation when they entered into a Consent Agreement with the Commission on January 10, 2022.

Staff determined that this violation could be cleared at this time.

3. In regard to the probable violation of 49CFR §199.113(c) which was cited in Inspection Number AT19-039; in that inspection Staff stated:

"During this inspection Staff found no training record for the Supervisor of the Gas Superintendent who is a covered employee in the Operators Anti-Drug Plan.

PROBABLE VIOLATION: Operator failed to provide supervisory personnel who will determine whether an employee must be drug tested based on reasonable cause, 60-

minute period of training on the specific, contemporaneous physical, behavioral, and performance indicators of probable drug use."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039 that was filed with the Public Service Commission on September 24, 2020, the Operator stated:

"LaFayette does not contest the violation alleged or request an informal conference to discuss this NOPV and files the following written statement indicating that corrective measures have achieved compliance:

Lafayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FIRST FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"LaFayette has not received the Report on Inspection AT19-039 and will respond upon receipt."

SECOND FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) Staff asked the Operator if they were able to provide any status to this issue that was brought up during the AT19-039 Drug & Alcohol inspection. The Operator informed Pipeline Safety Staff that they are in the process of having a person who is not in the random drug testing pool, take the 60-minute training on specific, contemporaneous physical, behavioral and performance indicators of probable drug use."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"The City Manager has taken the 60/60 training as stated."

THIRD FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated

"LaFayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FOURTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FIFTH FOLLOW-UP INSPECTION: During this inspection (EA25-041), Staff reviewed the copies of the 60-minute training certificate for the City Manager and Supervisor submitted by the City of LaFayette Gas Department and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

4. In regard to the probable violation of 49CFR §199.241 which was cited in Inspection Number AT19-039; in that inspection Staff stated:

"COMMENTS: During this inspection Staff found no training record for the supervisor of the Gas Superintendent who is a covered employee in the Operators Anti-Alcohol Plan.

PROBABLE VIOLATION: Operator failed to provide 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039 that was filed with the Public Service Commission on September 24, 2020, the Operator stated:

"LaFayette does not contest the violation alleged or request an informal conference to discuss this NOPV and files the following written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated:

Lafayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FIRST FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"LaFayette has not received the Report on Inspection AT19-039 and will respond upon receipt."

SECOND FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) Staff asked the Operator if they were able to provide any status to this issue that was brought up during the AT19-039 Drug & Alcohol inspection. The Operator informed Pipeline Safety Staff that they are in the process of having a person who is not in the alcohol testing pool take the 60-minute training on the physical, behavioral, speech and performance indicators of probable alcohol misuse."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"The City Manager has taken the 60/60 training as stated."

THIRD FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated

"LaFayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FOURTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FIFTH FOLLOW-UP INSPECTION: During this inspection (EA25-041), Staff reviewed the copies of the 60-minute training certificate for the City Manager and Supervisor submitted by the City of LaFayette Gas Department and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

PROBABLE VIOLATIONS CONTINUING

1. In regard to the probable violation 49CFR §192.467(c) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

   "During this inspection (JS19-013) Staff performed a field inspection of the Operator's cathodic protection system and found that they have not achieved electrical isolation from their casings.

   PROBABLE VIOLATION: The City of LaFayette Gas Department failed to achieve electrical isolation from metallic casings."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

   "LaFayette will excavate to the ends of the Warren Road, Park Street, and Foster Mill Road casings and examine the carrier pipe by December 20, 2019, and then develop a plan for achieving electrical isolation by January 2020."

   FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

   "At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

   SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

"LaFayette has contracted with a consulting engineer to obtain permits and quotes to clear the shorted casings and will advise Staff of the projected completion date when it is known."

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

"LaFayette has contracted with a consulting engineer to obtain permits and quotes to clear the shorted casings and will advise Staff of the projected completion date when it is known."

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"LaFayette has excavated the ends of the Warren Road, Park Street, and Foster Mill Road casings and examined the carrier pipe. A plan will be developed for achieving electrical isolation by September 1, 2020."

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) the Operator informed Staff that they did attempt digging up these casing locations but were unsuccessful in separating the pipe from the casing. They are in the process of getting quotes to have a contractor do this work for them."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette has contracted with a consulting engineer to obtain permits and quotes to clear the shorted casings and will advise Staff of the projected completion date when it is known."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette will address one of its three shorted casings by 05-31-23. LaFayette has applied for railroad permits needed to address the remaining two shorted casings and expects this work to be completed by 12-31-23."

SIXTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette will address one of its three shorted casings by 05-31-23. LaFayette has applied for railroad permits needed to address the remaining two shorted casings and expects this work to be completed by 12-31-23."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041), Staff reviewed the work order submitted by the City of LaFayette Gas Department for the completed Foster Mill Rd. replacement and the plans for the (2) remaining casings. The Operator is still trying to obtain permits from D.O.T. to complete replacements.

Staff determined that this violation could not be cleared at this time.

2. In regard to the probable violation of 49CFR §192.553(a)(1) which was cited in Inspection Report Number JS19-013; in that inspection Staff stated:

"The Operator performed an uprating to the Skyline Heights system. The Operators uprating plan called for two (2) incremental pressure increases. The Operator provided records which demonstrated that a leak survey was conducted on this system on November 10/11, 2011; however they could not demonstrate that a leak survey had been conducted prior to the first incremental pressure increase as required by their uprating plan. The plan called for this leak survey to occur during June 2014.

The Operator also provided records which indicated that there was a leak survey conducted following the first incremental pressure increase from 19PSI to 27 PSI on September 30 to October 1, 2014. The Operator also provided records which they claim indicates that a leak survey was conducted after the 2nd incremental pressure increase; however, the record does not indicate the dates of the survey, or state the pressure the line was increased to.

The Operator could not provide any records which demonstrated that the pressure on this pipeline was held constant while the entire segment of the pipeline that was checked for leaks, as required by their uprating plan.

PROBABLE VIOLATION: The Operator failed to perform the uprating of the Skyline Heights in accordance with the requirements of 192.553(a)(1) and their uprating plan."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

"LaFayette will address this issue as follows:

- *Review the design, operating, and maintenance history of the Skyline Heights system by February 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review by February 2020, and then revise as necessary*
- *Install pressure regulators feeding the Skyline Heights system by February 2020*
- *Perform the uprating within 120 days of completion of Staff review of the plan"*

FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their

written inspection report and was in process of reviewing for response to this office within 30 days."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

Restrictions associated with COVID-19 have delayed LaFayette's addressing this issue. A revised schedule describing how LaFayette will address this issue follows:

- *Review of the design, operating, and maintenance history of the Skyline Heights system is complete*
- *Install pressure regulators feeding the Skyline Heights system: Completed June 19, 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review: Completed July 6, 2020*
- *If no objection to the proposed uprating plan is received from GPSC Staff within 15 days of submittal of the plan for review, LaFayette will proceed with uprating.*
- *Perform the uprating within 120 days of commencement, subject to any restrictions in place related to with COVID-19.*

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) the Operator informed Staff that they are presently working with Sapp Engineering to address the problems that stem from the uprating of the Skyline Heights system."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SIXTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041) Staff determined that the Operator has still not demonstrated that this uprating was conducted in compliance with the requirements of 49CFR, Part 192, SubPart K. Staff is referring this item to the Facilities Protection Unit Supervisor and/or Director for resolution.

Staff determined that this violation could not be cleared at this time.

3. In regard to the probable violation of 49CFR §192.553(b) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

"The City of LaFayette Gas Department preformed an uprate of the Skyline Heights system from 19 to 35psi. During this uprating process the Operator failed to maintain for the life of the segment a record of each investigation required by this subpart, of all work performed, and of each pressure test conducted, in connection with the uprating. Specifically, the Operator failed to maintain documentation which demonstrated a leak

survey was conducted prior to the start of the pressure increase; documentation which demonstrated that a leak survey was conducted following the 2nd pressure increase; and documentation which demonstrated that the pressure was held constant while the entire segment of the pipeline that was checked for leaks, as required by their uprating plan.

Staff also noted that the Operator uprating plan states, in section 4, that: "Records of the investigations, the work, and the testing associated with this Uprating Procedure will be maintained for the life of the facility."

PROBABLE VIOLATION: The City of Lafayette failed to maintain records which demonstrate that the uprating of the Skyline Heights system was conducted in accordance with SubPart K, and their uprating procedure."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

"LaFayette will address this issue as follows:

- *Review the design, operating, and maintenance history of the Skyline Heights system by February 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review by February 2020, and then revise as necessary*
- *Install pressure regulators feeding the Skyline Heights system by February 2020*
- *Perform the uprating within 120 days of completion of Staff review of the plan"*

FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

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SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

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FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

> *Restrictions associated with COVID-19 have delayed LaFayette's addressing this issue. A revised schedule describing how LaFayette will address this issue follows:*
> - *Review of the design, operating, and maintenance history of the Skyline Heights system is complete*
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FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

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FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

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Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SIXTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041) Staff determined that the Operator has still not demonstrated that this uprating was conducted in compliance with the requirements of 49CFR, Part 192, SubPart K. Staff is referring this item to the Facilities Protection Unit Supervisor and/or Director for resolution.

Staff determined that this violation could not be cleared at this time.

4. In regard to the probable violation of 49CFR §192.553(d) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

"The Operator's uprating plan fails to demonstrate how the MAOP of the Skyline Heights system was established prior to performing this uprating. The Operator's uprating plan states that the: "Proposed MAOP is less than the 200 psig maximum allowed by §192.619(a)(1)(ii)"; however, the plan fails to demonstrate that the proposed 200psig pressure is the lowest pressure calculated under §192,619(a) and §192.621(a).

Staff also notes that under §192.621(a) the Operator must consider the design pressure of the weakest element in the segment, determined in accordance with Part 192, SubPart's

C and D; and they must consider the history of the segment, particularly known corrosion and the actual operating pressures. Staff found that the Operator's uprating plan states that during their review of the requirements for §192.619 and §192.621, they found that "most variables are unknown"; including original construction dates, wall thicknesses, and grade of materials.

PROBABLE VIOLATION: The City of Lafayette failed to substantiate the maximum allowable operation pressure of the Skyline Heights system prior to performing an uprate."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

"LaFayette has documented the MAOP of the Skyline Heights system prior to performing the uprating."

FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"LaFayette has documented the MAOP of the Skyline Heights system prior to performing the uprating."

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) the Operator informed Staff that they are presently working with Sapp Engineering to address the problems that stem from the uprating of the Skyline Heights system."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SIXTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline,

construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

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SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041) Staff determined that the Operator has still not demonstrated that this uprating was conducted in compliance with the requirements of 49CFR, Part 192, SubPart K. Staff is referring this item to the Facilities Protection Unit Supervisor and/or Director for resolution.

Staff determined that this violation could not be cleared at this time.

5. In regard to the probable violation of 49CFR §192.557(b)(1) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

In 2014 the city of LaFayette Gas Department performed an Uprate of the Skyline Heights system from 19 to 35psi. Staff reviewed the Operators uprating plan and procedure, and found that it failed to demonstrate that the Operator had performed a thorough review of the pressure ratings of the pipeline system components, such as valves, fittings, pipe, and regulators, prior to performing this pressure increase. Staff found that the Operator's uprating plan states that during their review of the requirements for §192.619 and §192.621, they found that "most variables are unknown"; including original construction dates, wall thicknesses, and grade of materials.

PROBABLE VIOLATION: The Operator's uprating plan and procedure failed to identify all the pipeline components and pressure rating for affected facilities.

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

"LaFayette will address this issue as follows:

- *Review the design, operating, and maintenance history of the Skyline Heights system by February 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review by February 2020, and then revise as necessary*
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- *Perform the uprating within 120 days of completion of Staff review of the plan"*

FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

> *"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."*

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

> *"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."*

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> *"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."*

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

> *"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."*

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FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

> *Restrictions associated with COVID-19 have delayed LaFayette's addressing this issue. A revised schedule describing how LaFayette will address this issue follows:*
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PROBABLE VIOLATION: The City of Lafayette is operating their Skyline Heights system at a pressure above its demonstrated maximum allowable operating pressure.

In their response to this inspection, the Operator must demonstrate how they established the MAOP of this pipeline prior to performing the pressure test. They must then demonstrate that this pipeline can be uprated in accordance with the requirements of §192.553 and §192.557 from that previously established MAOP. If the Operator cannot demonstrate that this line can be uprated in accordance with the requirements in SubPart K, they must provide a plan for returning this line to its previous operating pressure as soon as possible."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated:

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- *Install pressure regulators feeding the Skyline Heights system: Completed June 19, 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review: Completed July 6, 2020*
- *If no objection to the proposed uprating plan is received from GPSC Staff within 15 days of submittal of the plan for review, LaFayette will proceed with uprating.*
- *Perform the uprating within 120 days of commencement, subject to any restrictions in place related to with COVID-19.*

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

> *"During this inspection (JS20-011) the Operator informed Staff that they are presently working with Sapp Engineering to address the problems that stem from the uprating of the Skyline Heights system."*

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

> "LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

> *"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."*

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

> *"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."*

SIXTH FOLLOW-UP INSPECTION: From May 9, to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

> *"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."*

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041) Staff determined that the Operator has still not demonstrated that this uprating was conducted in compliance with the requirements of 49CFR, Part 192, SubPart K. Staff is referring this item to the Facilities Protection Unit Supervisor and/or Director for resolution.

Staff determined that this violation could not be cleared at this time.

7. In regard to the probable violation 49CFR §192.605(a) which was cited in Inspection Number AT22-016; in that inspection Staff stated:

"Based on the observed deficiency indicated in this report, Staff determined that the Operator has failed to prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response.

OBSERVED DEFICIENCY: 49 CFR, §192.181 - Distribution line valves
(a) Each high-pressure distribution system must have valves spaced so as to reduce the time to shut down a section of main in an emergency. The valve spacing is determined by the operating pressure, the size of the mains, and the local physical conditions.

COMMENTS: The PHMSA Form 26 (Design and Construction of a Gas Distribution Facility), which Staff is required to complete, tasks Staff with determining if distribution line valves are being installed as required of §192.181. During this inspection Staff attempted to determine if the Operator was installing valves spaced so as to reduce the time to shut down a section of main in an emergency. However, the Operator was not able to provide Staff with a process for how the actual spacing and placement of these valves was established which would demonstrate that they have complied with their OPM procedure for valve spacing.

REQUIRED AMENDMENT: The City of Lafayette must amend their procedures to address the placement of distribution line valves for their system."

OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"The City of LaFayette will implement a Construction Manual that includes provisions for the placement of valves in newly constructed distribution mains by June 23, 2023."

FIRST FOLLOW-UP INSPECTION: Due to the number of outstanding violations to be reviewed during this inspection (EA25-041), Staff did not have time to review this item while on-site. Staff

requests the Operator submit a copy of their amended procedure for review with their response to this inspection.

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

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