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Georgia Public Service Commission

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Atlanta, GA 30334-5701

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psc.ga.gov

Docket No. 37069

DOCKET# 37069
DOCUMENT# 225795

City of Millen Gas Department
P. O. Box 929
Millen, GA 30442

REF: Follow Up Inspection # JS25-022

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Jeff Brantley

On August 4, 2025, a representative of the Georgia Public Service Commission Pipeline Safety/Facilities Protection Office conducted an on-site inspection of your gas system and found that previously identified probable violation(s) of the Pipeline Safety Regulations have either been cleared or are continuing, as identified below.

- ☐ Previously existing probable violation(s) has/have been cleared.
- ☒ Previously existing probable violation(s) still exist.
- ☐ Additional Enforcement
  - ☐ Notice of Proposed Violation
  - ☐ Notice of Proposed Violation with Proposed Civil Penalty
  - ☐ Warning Letter
  - ☐ Letter of Concern
  - ☐ Observed Issue
- ☐ Consent Agreement Pending

The enclosed inspection report numbered JS25-022 is provided for your information and file.

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Actions, Enforcement Letters, and Notifications Issued by the Georgia Public Service Commission. Please refer to Docket No. 37069 in your response.

Please let me know if there are any questions concerning this report at (404) 985-4271 or mthebert@psc.ga.gov. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle Thebert

Michelle L. Thebert
Director, Office of Pipeline Safety/Facilities Protection

COMMISSIONERS

JASON SHAW , Chairman
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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JS25-022

OPERATOR: City of Millen Gas Department

INVESTIGATOR: Jason Smith

INSPECTION DATE: August 4, 2025 REPORT MAILED DATE: March 11, 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 Operator's previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
191.11	Distribution system: Annual report.	DL23-005	1/26/2023
192.706	Transmission lines: Leakage surveys.	DL23-005	1/26/2023
192.619(a)	No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum...	DL23-005	1/26/2023
192.195(a)	General requirements. Except as provided in §192.197, each pipeline that is connected to a gas...	DL23-005	1/26/2023
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	DL23-005	1/26/2023
192.1007(a)(5)	Provide for the capture and retention of data on any new pipeline installed.	JS25-024	7/29/2025
192.1007(a)	Knowledge. An operator must demonstrate an understanding of its gas distribution system ...	JS25-024	7/29/2025

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF MILLEN NATURAL GAS SYSTEM / FOLLOW-UP INSPECTION
INSPECTION NUMBER JS25-022 / DOCKET NUMBER 37069

On August 4, 2025, Pipeline Safety Staff reported to the City of Millen to perform a follow-up inspection on the City of Millen Natural Gas System's previously existing probable violations.

During this inspection the Operator was represented by:
Johnny Thomas - Utility Director
Dennis Small - Gas Operator
Brandon Taylor - Gas Tech
Tara Gary - Gas Utility Administrator

Commission Staff was represented by:
Jason Smith - Lead Inspector
Glen Murphy - Pipeline Safety Staff

At the time of this inspection, the City of Millen Natural Gas System was under five (5) previously existing probable violation. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATION CONTINUING

1. In regard to the probable violation of 49CFR §191.11 which was cited under inspection #DL23-005; in that report Staff stated:

   "During this inspection Staff found that the Operator reported on their 7100 report for calendar year 2022 a total of 1,122 services and 46.42 miles of distribution main. However, Staffs review of leakage survey records provided by the Operator indicated that they are reporting a system wide leakage survey total of 1,322 services and 53.58 miles of distribution main. This Indicates that they are under reporting 200 services and 7.16 miles of main.

   PROBABLE VIOLATION: The City of Millen Gas System failed to demonstrate that they have complete and accurate numbers submitted on their annual 7100 report."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number DL23-005, dated March 28, 2024; the Operator stated:

   "The City of Millen has confirmed that the quantities reported on its PHMSA Form 7100.1-1 Annual Report are accurate. The differences in the total miles of main and number of services lines between the Annual Report and leakage surveys are due to overlaps in survey areas and the resulting duplication of facilities being surveyed. Documentation will be presented during the requested Informal Conference."

   FIRST FOLLOW-UP INSPECTION: On August 4, 2025, Staff reported to the City of Millen Gas System to perform a Follow-Up inspection on the Operator's previously existing probable violations. During this inspection (Inspection Number JS25-022) Staff first reviewed Millen's annual 7100 reports.

   - 2018 annual 7100 report states 46.4 miles of main and 1,161 services
   - 2019 annual 7100 report states 46.4 miles of main and 1,161 services
   - 2020 annual 7100 report states 46.4 miles of main and 1,161 services
   - 2021 annual 7100 report states 46.4 miles of main and 1,140 services
   - 2022 annual 7100 report states 46.4 miles of main and 1,122 services
   - 2023 annual 7100 report states 46.4 miles of main and 1,122 services

- 2024 annual 7100 report states 46.4 miles of main and 1,122 services

Staff then reviewed Millen's leak surveys from 2019 until 2024.

- 2019 leak survey states a total of 23.0 miles of main and 597 services were surveyed.
  - 10 miles of main and 231 services were surveyed in the business district.
  - 13 miles of main and 366 services were surveyed in the Non-business district.

- 2020 leak survey states a total of 14.5 miles of main and 501 services were surveyed.
  - (There Was No Summary Sheet Breaking Down Business & Non-Business District)
  - Approximately 10.5 miles of main and 269 services were surveyed in the Non-business district.

- 2021 leak survey states 4.4 miles of main and 222 services were surveyed in the business district.
  - 14.57 miles of main and 262 services were surveyed in the Non-business district.

- 2022 leak survey states 4.4 miles of main and 225 services were surveyed in the business district.
  - 11.24 miles of main and 304 services were surveyed in the Non-business district.

- 2023 leak survey states 4.4 miles of main and 218 services were surveyed in the business district.
  - 22.28 miles of main and 268 services were surveyed in the Non-business district.

- 2024 leak survey states 4.4 miles of main and 265 services were surveyed in the business district.
  - 14.57 miles of main and 242 services were surveyed in the Non-business district.

Three years of leak surveys should equal to Millen's total gas distribution system, so Staff had the Utility Director add up the numbers.

- 2020 (10.5) + 2021 (14.57) + 2022 (11.24) + Business District (4.4) = (40.71) miles of main
  - It appears approximately 5.71 miles of main was missed during this period. (46.42 – 40.71)
- 2020 (269) + 2021 (262) + 2022 (304) + Business District (232) = (1,067) services
  - It appears at least 55 services were missed during this period. (1,122 – 1,067)

- 2022 (11.24) + 2023 (22.28) + 2024 (14.57) + Business District (4.4) = (52.49) miles of main
  - 6.07 extra miles of main surveyed during this period. (52.49 – 46.42)
- 2022 (304) + 2023 (268) + 2024 (242) + Business District (265) = (1,079) services
  - It appears at least 43 services were missed during this period. (1,122 – 1,079)

Millen's Utility Director informed Pipeline Safety Staff that they will be looking further into their annual 7100 report numbers (considering a complete system survey to verify the total number of services). They also acknowledge the appearance of extra miles of main being leak surveyed, and that could be contributing to moving from a 5-year cycle to a 3-year cycle.

Since the 2023 comp. inspection Millen Natural Gas has acquired RightSpot (GIS / mapping) application which they believe can also aid in rectifying these issues.

Since the annual 7100 report numbers and 3-year leak survey number haven't matched up yet, Staff was not comfortable clearing this probable violation.

On September 16, 2025, Staff noticed that the Operator submitted supplemental annual 7100 reports for 2021, 2022, 2023 and 2024 on August 7, 2025. The number of services decreased in each of the years. Staff reviewed these numbers and found that:

- 2021 annual report went from 1,140 to now being 1,131 services
- 2022 annual report went from 1,122 to now being 1,108 services
- 2023 annual report went from 1,122 to now being 1,095 services
- 2024 annual report went from 1,122 to now being 1,081 services

Since the Operator updated their data source Staff recalculated and determined the following:

- 2020 (10.5) + 2021 (14.57) + 2022 (11.24) + Business District (4.4) = (40.71) miles of main
  - It appears approximately 5.71 miles of main was missed during this period. (46.42 – 40.71)
- 2020 (269) + 2021 (262) + 2022 (304) + Business District (232) = (1,067) services
  - It appears at least 41 services were missed during this period. (1,108 – 1067)

- 2022 (11.24) + 2023 (22.28) + 2024 (14.57) + Business District (4.4) = (52.49) miles of main
  - It appears that 6.07 extra miles of main surveyed during this period. (52.49 – 46.42)
- 2022 (304) + 2023 (268) + 2024 (242) + Business District (265) = (1,079) services
  - It appears approximately 29 services may have been missed during this period. (1,108 – 1,079)

Millen Natural Gas System stated in their March 28, 2024, response letter how they would like to have an Informal Conference and present documentation that may help in resolving this matter.

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

2. In regard to the probable violation of 49CFR, §192.195(a) which was cited under inspection #DL23-005; in that report Staff stated:

> "During this inspection Staff found that the Operator failed to provide overpressure protection on their pipeline system at their Kinder Morgan gas supplier connection. The MAOP for this pipeline has been established at 1200 psig.
>
> PROBABLE VIOLATION: The City of Millen Gas System failed to provide overprotection as required under Part 192.195(a)."

OPERATOR RESPONSE: In their response letter to Inspection Number DL23-005, dated March 28, 2024; the Operator stated: "The City of Millen requests an Informal Conference with GPSC Staff to review and discuss the configuration of the facilities cited in this Probable Violation"

FIRST FOLLOW-UP: On August 4, 2025, Staff reported to the City of Millen Gas System to perform a Follow-Up inspection on the Operator's previously existing probable violations. During this inspection (JS25-022) the Operator informed Staff that a relief valve was not installed on their pipeline system at their Kinder Morgan (Southern Natural) tap off Rabitsch Road. Millen's Utility Director informed Staff that this 200ft section of 4-inch pipeline was designed and tested in 2014 to have a maximum allowable operating pressure of 1,248 psi. The Operator contends this 1,248 psi MAOP exceeds any pressure Kinder Morgan (Southern Natural) would be able to dump into the city of Millen's distribution system. Because it was over designed, the Operator felt there was not a need to install over pressure protection.

In order to address this violation, the City of Millen Natural Gas System will have to demonstrate that their supplier cannot damage their system by over pressuring it due to a failure.

The City of Millen Natural Gas System has requested an Informal Conference to discuss this matter.

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

3. In regard to the probable violation of 49CFR §192.619(a) which was cited under inspection #DL23-005; in that report Staff stated:

> "During this inspection the Operator was unable to provide documentation that demonstrates they have determined the MAOP for their 500 psig, 250 psig, and 28 psig systems in accordance with Part 192.619(a).
>
> PROBABLE VIOLATION: The City of Millen failed to establish a maximum allowable operating pressure for three of their high-pressure distribution pipeline segments in their system as required under Part 192."

FIRST OPERATOR RESPONSE: In their response letter to Inspection #DL23-005, dated March 28, 2024; the Operator stated that: the City of Millen has compiled documentation establishing MAOP of its pipeline facilities. This documentation is available for Staff's review.

FIRST FOLLOW-UP INSPECTION: On August 4, 2025, Staff reported to the City of Millen Gas System to perform a Follow-Up inspection on the Operator's previously existing probable violations. During this inspection (JS25-022) Staff first clarified the MAOPs in question within Millen's distribution system were actually 590 MAOP, 333 MAOP and 60 MAOP. Staff then wanted to review the documentation the City of Millen compiled to establish the MAOP of its pipeline facilities.

For the 590 MAOP system on Rabitsch Road the Operator provided documentation showing the 6-inch, X52M pipe that was pressure tested April 19 and April 20, 2014; however, these two pressure charts did not actually list the Operator name or the test medium used (as required by §192.517 - Records).

Millen Gas System also had material summary sheets from Consolidated Pipe & Supply shipping pipe to the Operator's contractor, and documentation showing materials ordered for the expansion service to Carbo Ceramics being done by RAW Construction in 2014.

For the 333 MAOP and 60 MAOP systems the Operator provided two letters from the Robert P. Gray Consulting Engineer company. One letter dated December 17, 1986, states when the natural gas system was constructed in 1954, the distribution system it was tied in to; services were tested at 100 psig; which would give a MAOP of 67 psig.

The letter dated December 27, 1988, states that while their construction files are no longer complete, they do know the natural gas system was built in 1954. The high-pressure line (from the odorizer to the city gate station) was tested at 500 psig, which would give a MAOP of 333 psig. The distribution system was tested at 90 psig which would give a MAOP of 60 psig. The line to Jockey was tested at 500 psig, which would give it a MAOP of 333 psig. The latest high-pressure line to the industrial park

was tested on January 19, 1988, at 500 psig hydrostatically which would give it a MAOP of 333 psig. Millen's original high-pressure line subsequent to test, had been operated at 200 psig for 34 years.

The Operator also provided relief valve inspection records from December 1975 through May 1979 stating the pressure range of the relief valve was 400-800, it was set to 500 psi; and max. main pressure was 200psi at the Local Border Station (City Gate) located at Sardis Road (the only reg. station at the time).

The documentation Millen Gas System provided for Staff to review was not sufficient to establish the maximum allowable operating pressure for their 590, 333 and 60 MAOP distribution pipeline segments in their system

Staff determined that this probable violation §192.619(a) could not be cleared at this time.

4. In regard to the probable violation of 49CFR §192.706 which was cited under Inspection Number DL23-005; in that report Staff stated:

> "During this inspection the Operator was unable to provide documentation that demonstrates they have determined that their six-inch operating with a 1200 psig MAOP was transmission or high-pressure distribution. Calculations performed by Staff indicated that this segment of the pipeline is operating at over 20% SMYS and should be maintained as a transmission pipeline with an annual leakage survey being performed.
>
> PROBABLE VIOLATION: The City of Millen failed to perform an annual leakage survey on their six-inch transmission pipeline system as required under Part 192.706."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number DL23-005, dated March 28, 2024; the Operator stated: "The City of Millen has confirmed that the facilities referenced in this Notice of Probable Violation have an MAOP that results in a hoop stress that is less than 20% SMYS. Documentation will be provided to Staff during the requested Informal Conference."

FIRST FOLLOW-UP INSPECTION: The week of August 4, 2025, Staff reported to the City of Millen Gas System to perform a Follow-Up inspection on the Operator's previously existing probable violations. During this inspection (JS25-022) Millen Natural Gas provided Staff with documentation they couldn't locate during the 2023 comp. inspection and reviewed it.

This included a 'Summary of Leak Tests by Sub System' form, which illustrates the 1,248 MAOP, 'Southern Tap #2 to Reg. Station #4 @ Rabitsch Road' pipeline, which consist of 4-inch steel piping that was pressure tested in 2014 at 1,600 psig. It normally operates at approximately 1,100 psig. The Operator also provided a certificate of testing from Ipsco Tubulars, Inc. for the 4.5-inch Diameter, .337-inch Gage, X52M pipe dated March 11, 2014.

Millen Natural Gas also provided a 'Pressure Test Record' for their Kinder Morgan Rabitsch Road regulator station. The pressure test started on April 29 at 9:30am and concluded on April 30, 2024, at 9pm. The test medium was 1,800 psi of nitrogen for the 200+ foot of 4.5-inch X52 pipe, with a wall thickness of .219. Staff notes that the wall thickness info on this 'Pressure Test Record' does not match with the information on the certificate of testing from Ipsco Tubulars, Inc. mentioned previously. When calculating the SMYS using the certificate of testing from Ipsco Tubulars, Inc. gage (wall thickness)

info: .337 inch the SMYS equals 15.41%. When calculating the SMYS using the 'Pressure Test Record' wall thickness info: .219 inch the SMYS equals 23.71%.

The conflicting information on the documentation Millen Gas System provided for Staff to review can be addressed during the Informal Conference they have requested.

Staff determined that this probable violation §192.706 could not be cleared at this time.

5. In regard to the Notice of Amendment 49CFR, §192.181 which was cited under Inspection Number DL23-005; in that report Staff stated:

> "During this inspection (DL23-005) the Operator was unable to provide a process for the placement of distribution line valves in accordance with Part 192.181. Because the Operator could not define where these valves are required Staff could not determine if the Operator could perform an emergency shutdown and/or pressure reduction in any section of their pipeline system if it were necessary to minimize hazards to life or property as required by §192.615(a)(6).
>
> During this inspection Staff found no procedures for placement of valves for emergency response and regulator stations. Operator was unable to provide a process in their emergency plan for how, when, or where an emergency shutdown would take place in any section of their system. Also, the Operator's emergency valves listed in their emergency plan do not identify which valve or valves shut off a particular pipeline section in the event of an emergency.
>
> During this inspection Staff also found that the Operator failed to check and service approximately 61 distribution valves which were previously being serviced annually in their distribution system since calendar year 2016 and 2019. The Operator's records failed to indicate why these valves were removed from the annual service schedule.
>
> REQUIRED AMENDMENT: The City of Millen must amend its procedures to address the placement of distribution line valves for its system. They must also amend their procedures to ensure that the valves that they have identified for annual maintenance under §192.747(a) are sufficient to ensure their compliance with §192.615(a)(6)."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number DL23-005, dated March 28, 2024, the Operator stated that: "The City of Millen (Millen) has implemented a Construction Manual that includes provisions for determining the placement of valves in new Distribution Mains. Millen has also reviewed its system and identified critical valves. These valves are being maintained in accordance with applicable requirements."

FIRST FOLLOW-UP: On August 4, 2025, Staff reported to the City of Millen Gas System to perform a Follow-Up inspection on the Operator's previously existing probable violations. During this inspection, (JS25-022) Staff asked the Operator if they made any progress in correcting §192.181. For the first issue the Millen Natural Gas System provided Staff with, first a copy of their Construction Manual, section C 'Distribution Line Valves'.

Staff determined that the language contained in the 'Distribution Line Valves' section is guidance criteria, and while this information is useful for developing a valve placement procedure, it is not a procedure for the placement of valves in the City of Millen Natural Gas System.

Next, Staff reviewed Millen's Operations & Maintenance manual section 13-W 'Valve Maintenance - Distribution Systems [192.747]' which references appendix Z-3 'Distribution Critical Valve Locations'.

While it does not appear any changes were made to their valve maintenance procedures, Millen informed Staff that they have obtained RightSpot, a GIS/mapping application. This app has the capability of allowing the user to select the area they need to isolate by dropping a pin, then the nearest isolation valves are displayed. In addition to this function, the RightSpot GIS app is assisting with determining the location of critical valves in their system.

In reference to the construction manual 'Distribution Line Valves' section, the Operator informed Staff that they have been milling over some ideas to improve this section and would let Staff know when any changes take place.

Staff determined that §192.181(a) could not be cleared at this time.

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Letters Issued by the Georgia Public Service Commission.

OPERATOR RESPONSE FORM

Operator Name: City of Millen

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37069

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 Millen Gas Department	)	**DOCKET NO. 37069**
	)	
	)	
	)	

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

*Jeff Brantley, City Manager
City of Millen Gas Department
P.O. Box 929
Millen, GA 30442
jbrantley@cityofmillenga.gov

*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