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Georgia Public Service Commission

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DOCKET# 37069
DOCUMENT# 225798

Docket No. 37069

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

REF: DIMP – Implementation Inspection # JS25-024

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Jeff Brantley

On July 29, 2025, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JS25-024 is provided for your information and file.

In conjunction with this inspection report, Staff has recommended the following enforcement(s):

Enforcement Action:

- ☒ Notice of Probable Violation
- ☐ Notice of Probable Violation with Proposed Civil Penalty
- ☐ Notice of Amendment

Enforcement Letter:

- ☐ Warning Letter
- ☐ Letter of Concern

Enforcement Notification:

- ☐ Observed Issue
- ☐ No Violation

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

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JS25-024

OPERATOR: City of Millen Gas Department

INVESTIGATOR: Jason Smith

INSPECTION DATE: July 29, 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 an inspection of the Operator's implementation of their Distribution Integrity Management Program (DIMP) for compliance with the minimum federal standards in 49CFR Part 192, SubPart P.

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

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
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

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On August 5, 2025, Pipeline Safety Staff reported to the city of Millen to conduct an inspection of the gas department's implementation of their Distribution Integrity Management Program for compliance with the minimum federal standards in 49CFR Part 192.

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 violations. Staff reviewed these probable violations with the Operator under Follow-Up Inspection Number JS25-022.

During this inspection, Staff examined the Operator's current and previous DIMP versions and related records utilizing PHMSA's Gas Distribution System DIMP Implementation inspection form #24 to verify compliance with minimum federal safety regulations.

Staff reviewed Millen Natural Gas System's Distribution Integrity Management plan version 7.1, annual 7100 reports for the last five years, atmospheric corrosion/leak surveys, work orders and system GIS mapping.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection, Staff found that the City of Millen Natural Gas System was in probable violation of the minimum federal safety standards; specifically:

1. 49CFR §192.1007 - What are the required elements of an integrity management plan?
   A written integrity management plan must contain procedures for developing and implementing the following elements:
   (a) Knowledge. An operator must demonstrate an understanding of its gas distribution system developed from reasonably available information.
   (5) Provide for the capture and retention of data on any new pipeline installed. The data must include, at a minimum, the location where the new pipeline is installed and the material of which it is constructed.

   PHMSA Gas Distribution System DIMP Implementation inspection form question #6.
   System Knowledge - New Pipe Data
   Have required data on any new pipeline installations since August 2, 2011 been captured (e.g., location, wall thickness/SDR, manufacturer, lot/production number)?

   STAFFS COMMENTS: Millen's DIMP version 7.1, Chapter 3 'Knowledge of the Distribution System' states: "Records for all piping system installed after the effective date of this Plan will be captured and retained by MILLEN NATURAL GAS SYSTEM, CITY OF. This will include the location where new piping and appurtenances are installed and the material of which they are constructed."

During this inspection Staff asked the Operator for a few work orders to review to ensure they were capturing and retaining data on newly installed pipelines. One of the work orders provided by the Operator was for a gas main replacement on Acorn Avenue done by a contractor on August 11, 2022. They were replacing 235 feet of 1 ½" coated steel main with 2" plastic main; tied in with a TDW tapping tee and a 2" transition fitting. This 2" plastic was the end of the line (dead-end), so Staff ask the Operator about the end cap component. Staff also asked the Operator how two services were reconnected/reestablished (what components were used). Neither the work order, or the Millen Natural Gas System personnel were able to provided Staff with this information.

PROBABLE VIOLATION: The City of Millen Natural Gas System failed to capture data on newly installed pipelines as required by §192.1007(a)(5).

2. 49CFR §192.1007 - What are the required elements of an integrity management plan?
A written integrity management plan must contain procedures for developing and implementing the following elements:
(a) Knowledge. An operator must demonstrate an understanding of its gas distribution system developed from reasonably available information.

PHMSA Gas Distribution System DIMP Implementation inspection form question #7.
System Knowledge - Data Collection Forms
Are data collection forms used in conjunction with the operator's DIMP plan being fully and accurately completed?

STAFFS COMMENTS: During this inspection Staff asked the Operator for a few work orders to review to ensure they were capturing and retaining data on their work orders for newly installed pipelines. One of the work orders provided by the Operator was for a gas main replacement on Acorn Avenue done by a contractor on August 11, 2022. They were replacing 235 feet of 1 ½" coated steel main with 2" plastic main; tied in with a TDW tapping tee and a 2" transition fitting. This 2" plastic was the end of the line (dead-end), so Staff ask the Operator about the end cap component. Staff also asked the Operator how two services were reconnected/reestablished (what components were used) since this information was missing from the work order provided. Millen Natural Gas System personnel were unable to provide Staff with documentation on this information.

PROBABLE VIOLATION: The City of Millen Natural Gas System failed to demonstrate that they are fully and accurately capturing information on their data collection forms to ensure that conditions in the field are being portrayed correctly.

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