OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of Eatonton

Docket Number: 37049

Responses required within **30 days of electronic mail.** Provide the following information for this report:

Response to Inspection Number: JS25-038

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 FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of Eatonton

Docket Number: 37049

Enforcement Action for: §192.181(a) ☐ 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: The City of Eatonton (Eatonton) respectfully submits the following status for the Continuing Violation of 192.181(a) as cited in Inspection AT21-025 conducted on September 20, 2021. On April 6, 2026, Eatonton placed the language attached as "City of Eatonton Valve Placement Language" to its` Construction Manual to address this Continuing Violation.

Response Provided by: Charlie Bales / Gas Superintendent Date: 04/08/2026

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: _____

Enforcement Action for: Consent Agreement Pending ☐ 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: The City of Eatonton (Eatonton) respectfully submits the following status for the Continuing Violation of Consent Agreement Pending as cited in Inspection AT23-003 conducted on January 10, 2023. Eatonton reviewed the Proposed Consent Agreement on October 30, 2025, and asked the Director of Pipeline Safety for a final version.

Response Provided by: Charlie Bales / Gas Superintendent (Name / Title) Date: 04/08/2026

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: _____

Enforcement Action for: Commission Rule 515-9-3-.09 ☐ 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: The City of Eatonton (Eatonton) respectfully submits the following status for the Continuing Violation of Commission Rule 515-9-3-.09 as cited in Inspection AT23-003 conducted on January 10, 2023. Eatonton attaches the Entrance Interview for Inspection JS26-011 where Staff states "Staff discussed matter with supervisor on 3-17-26 and determined this violation should be cleared".

Response Provided by: Charlie Bales / Gas Superintendent (Name / Title) Date: 04/08/2026

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.

ENTRANCE INTERVIEW WORKSHEET			
Inspection Number	JS26-011 & JS26-012	Docket #	37049
Operator Name	city of Eatonton Gas System		
Type Inspection	follow-up and DIMP inspection		
Lead Inspector	Jason Smith		
Inspection Team	Brian Withrow		

CONTACT INFORMATION			
	Name	Phone	E-mail Address
Gas Superintendent	Charles Bales	478-228-2098	cbales@bellsouth.net
Gas Dept. Admin. Assistant	Pat Welch	706-485-0195	
Consultant	Wade Sharpe		wsharpe@gasauthority.com
Mayor / City Manager / Company Officer to receive official report	Gary Sanders, City Administrator	706-485-3311	gsanders@eatontonga.us
Certified Mail Address	Eatonton City Hall 201 N Jefferson Avenue Eatonton, GA 31024-1021		

PRE-INSPECTION INFORMATION				
	Y	N	Date	Reason not contacted?
Operator Contacted				
Name of Person Contacted	Wade Sharpe (consultant)			
Scheduled Dates for Inspection	March 18, 2026			
Type of Inspection	DIMP inspection			

REVIEW OF PREVIOUS INSPECTION REPORT(S)			
			Notes
- Probable Violation	§192.181(a)	from #AT21-025	Violation Continuing
- Commission Rule Violation	515-9-3-.09	from #AT21-025	Staff discussed matter with supervisor on 3/17/2026 and determined this violation should be cleared.
- Negotiating Consent Agreement		from #AT21-025	Eatonton reviewed proposed Consent Agreement on 10/30/2025, and asked for a final version to be prepared

INFORMATION TO BE COMMUNICATED TO THE OPERATOR
GOALS AND EXPECTATIONS OF THIS INSPECTION:
EXPECTED OPERATOR PERSONNEL NEEDED FOR INSPECTION (POSITION/RESPONSIBILITIES/ETC.):
EXPECTED DURATION FOR INSPECTION (HOURS, DAYS, ETC.):
EXPECTATIONS OF OPERATOR:

SIGNATURES			
Inspector Signature		Operator Signature	
Jason Smith			
	3/31/2026	Date	

C. Distribution Line Valves (Ref. §192.181), (ADB-94-02)

i. Valves shall be designed and installed in all high-pressure distribution systems (systems operating over 7" W.C.) at locations that will reduce the time to shut down each section of the system in an emergency.

ii. When determining valve location and spacing to meet the requirements of §192.181, for new construction activities and Operations & Maintenance activities where large sections of main are replaced, the City of Eatonton shall utilize the principals contained in PHMSA Advisory Bulletin ADB-94-02 and the guide material developed by the Gas Piping Technology Committee (GPTC). As noted in Advisory Bulletin ADB-94-02, to specifically define the requirement for location and number of emergency valves is not feasible because the location and number of valves is dependent on local conditions, and because local conditions vary greatly. When designing the location and spacing of valves, the City of Eatonton shall utilize the following criteria:

   a. A review of existing valves in the system to determine whether existing valve(s) spacing is adequate to minimize the time required to shut down the affected section in the event of an emergency.
   b. Physical Characteristics such as pipeline material, pipe size, etc.
   c. Extent and character of area to be isolated (such as wall-to-wall paving area).
   d. Topography features or access barriers (such as rivers, major highways, and railroads).
   e. Number of valves necessary to isolate the area.
   f. Operating Characteristics such as operating pressure, pressure feeds, principal feeds into business districts, etc.
   g. Nature and concentration of end-use customers, particularly high-occupancy structures, hospitals, schools, and industrial users.
   h. Estimated response time for available personnel to arrive on-scene and complete isolation
   i. Spacing of valve(s) that will allow the affected portion of the system to be isolated by said valve(s) within an estimated time of 30-minutes or less once it is determined that the use of said valve(s) is necessary.
   j. Estimated time required to restore service to affected customers.