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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. 37024

DOCKET# 37024
DOCUMENT# 226290

AGL - Operations and Engineering
Ten Peachtree Place, NE Suite 1000
Location 1365
Atlanta, GA 30309

REF: Comprehensive Inspection # JH25-027

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Walt Farrell

On August 11, 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 JH25-027 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. 37024 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

b

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JH25-027

OPERATOR: AGL - Jesup

INVESTIGATOR: Jack Hewitt

INSPECTION DATE: August 11, 2025 REPORT MAILED DATE: April 15, 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 comprehensive inspection of the Operators plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.614(a)	Except for pipelines listed in paragraphs (d) and (e) of this section, each operator of a buried...	DL19-013	3/4/2019

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.613(b)	Continuing Surveillance - If a segment of pipeline is determined to be in unsatisfactory condition..	JH25-027	8/11/2025
192.479(a)	Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the...	JH25-027	8/11/2025

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

AGLC-JESUP / COMPREHENSIVE
INSPECTION NUMBER JH25-027 / DOCKET NUMBER 37024

From September 22 through September 25, 2025, Staff met with representatives from the Atlanta Gas Light Company to review records of operations and maintenance activities in preparation for comprehensive inspections of the Jesup Service Center.

During this inspection, the Operator was represented by:
Joe Caubo - Manager, Compliance and QA, Regulatory Compliance
Ralph McCollum - Principal Compliance
Shelly LaPladd – Corrosion Tech
Miles Steele – Corrosion Supervisor
Jeremy Perry – Superintendent, System Operations
Tim Conner – Superintendent, System Operations

Commission Staff were represented by:
Jack Hewitt – Lead Inspector
Brant Sweat – Pipeline Safety Inspector
Daniel Clemmons – Pipeline Safety Inspector

At the time of this inspection the AGLC Jesup Service Center had one (1) previously existing probable violation. This violation will be addressed during the Corporate Headquarters follow-up.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that the AGLC Jesup Service Center was in probable violation of the minimum federal safety standards; specifically:

1. §192.613 Continuing surveillance.
   (b) If a segment of pipeline is determined to be in unsatisfactory condition but no immediate hazard exists, the operator shall initiate a program to recondition or phase out the segment involved, or, if the segment cannot be reconditioned or phased out, reduce the maximum allowable operating pressure in accordance with §192.619 (a) and (b).

   STAFFS COMMENTS: General and Continuing Surveillance is addressed in Division II, Section 1 of the AGLC Operations and Procedures Manual, which states: "Included in this Division are procedures for the continuing surveillance of the Company's gas system(s) and instructions concerned with safety of the general public. Company policy requires that personnel make every effort to identify and report factors or conditions that may adversely affect the safe operation of Company facilities."

   During field evaluations Staff noted multiple instances where the Operators' facilities were found to have deteriorated coating, atmospheric corrosion, exposures from loss of cover, or other unusual operating and maintenance conditions that were not being addressed. (See attached photos)

   PROBABLE VIOLATION: AGLC personnel have failed to identify and report factors or conditions that could affect the safe operation of the company's facilities so that they can be remediated in a timely manner.

2. §192.479 Atmospheric corrosion control; General.
   (a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

STAFFS COMMENTS: In Division II, Section 8, Item 8.22, of the Operators OPM it states: "Each pipeline or portion of pipeline that is exposed to the atmosphere must be cleaned and applied with a coating suitable for the prevention of atmospheric corrosion. Coatings shall be in accordance with Division III, Section "7.5 Protective Coating Requirements" on page 9."

Staff performed field audits of the Operator's pipeline and found that they failed to clean and coat their facilities that are exposed to the atmosphere at commercial meter sets, meter sets that have meter bars that support multiple meters (see attached photos), these locations are being visited but atmospheric corrosion issues are not being addressed as required by their procedures.

PROBABLE VIOLATION: The Atlanta Gas Light Company Jesup Service Center failed to clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, as required by §192.479(a) and their OPM procedures.

OPERATOR QUALIFICATION PROTOCOL 9 FIELD EVALUATIONS

During this inspection Staff conducted five (5) OQ Protocol 9 field evaluations.

Jesse Collins / Pressure Control Spec. / "Installing, Operating, Inspecting, and Testing Pressure Limiting Devices (Regulator Station)" Task #OQ028A / Tasks performed correctly / Qualification verified as current Qualifications good through 12/31/2027.

Jesse Collins / Pressure Control Spec. / "Abnormal Operating Conditions (AOC's) Review" Task #OQ059A / Qualification verified as current Qualifications good through 12/31/2027.

Kyle Griffin/ Field Spec. C / "Valve Inspection "Task #OQ052A Tasks performed correctly / Qualification verified as current Qualifications good through 11/06/2027.

Staff verified that each individual was able to perform the covered tasks according to the procedures and was able to identify generic and task specific abnormal conditions and define the applicable actions.

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: ATLANTA GAS LIGHT COMPANY

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37024

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:	)	
	)	
Atlanta Gas Light Company	)	**DOCKET NO. 37024**
	)	
	)	
	)	

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

* Walt Farrell, President and CEO
Southern Company Gas
Ten Peachtree Place, NE,
Atlanta, GA 30309
wffarell@southernco.com

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

Respectfully Submitted this 23rd day of April 2026:

Cathy Nesbitt

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