OPERATOR RESPONSE FORM

Informal Conference Requested: Yes, X No

Operator Name: CITY OF Millen **Docket Number: 37069**

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

Response to Inspection Number **JS25-022**

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: _____

   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 X No

Operator Name: CITY OF Millen **Docket Number: 37069**

Enforcement Action for **191.11 DL23-005/JS25-022** ☐ 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
☐ Notice of Amendment (NOA)	☐ Yes ☐ No
☐ Warning Letter	☐ Yes ☐ No
☐ Letter of Concern	☐ Yes ☐ No
☐ Observed Issue	☐ Yes ☐ No
☐ Proposed Civil Penalty	☐ Yes ☐ No

Proposed Penalty for this violation

OPERATORS RESPONSE: The City of Millen believes that the main and services numbers reported on its PHMSA Form 7100.1-1 Annual Report are accurate. The City of Millen went from a five-year survey to a three-survey resulting in a duplication of facilities surveyed. To verify the accuracy of these numbers, The City of Millen is conducting a system wide survey of their mains and services These main and services will be counted and plotted on their GIS system (Diamond Maps) This survey will be completed by July 31, 2026.

Response Provided by: Johnny Thomas Utility Director Date: 04/24/2026.

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: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes, X No

Operator Name: CITY OF Millen **Docket Number: 37069**

Enforcement Action for: 192.706 **DL23-005/JS25-022** ☐ 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 Millen maintains pipe specifications and associated test charts for the 4" pipeline installed between Kinder Morgan and the City's #2 Gate Station located on Rabitsch Road. Information obtained from Kinder Morgan states that their pipeline has a Maximum Allowable Operating Pressure (MAOP) of 1,200 psi. The City of Millen constructed this section of pipeline with an MAOP 0f 1248psi. The City of Millen considers this pipeline to be part of a high-pressure distribution system. The City of Millen has confirmed that this pipe is 4.5" with a wall thickness of .337 and X52 pipe. All supporting documentation is available for review upon request.

Response Provided by: Johnny Thomas Utility Director Date: 04/24/2026.
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: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes X No

Operator Name: CITY OF Millen **Docket Number: 37069**

Enforcement Action for: **192.619 (a) DL23-005/JS25-022** ☐ 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 Millen maintains documentation for its 6-inch gas line, with a Maximum Allowable Operating Pressure (MAOP) of 590 psi, extending from Rabitsch Road to Highway 21 East. This documentation includes pressure test charts, material summary sheets for delivered pipes, and worksheets detailing test pressures and materials used during pressure testing.

Additionally, the city maintains documentation for the 8"and 6-inch line running from the regulator station located on Highway 21 to US Silica on Paramore Road.

Millen's 250psi line and the 33psi use historical information to establish their MAOP. Documentation is available for review.

Response Provided by: Johnny Thomas Utility Director Date: 4/24/2026.
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: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes, X No

Operator Name: CITY OF Millen **Docket Number: 37069**

Enforcement Action for: **192.195(a) DL23-005/JS25-022** ☐ New Violation X 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 Millen receives line pressure from Kender Morgan. Kinder Morgans MAOP on their line is 1200psi. This line operates historically between 800psig – 1175psig. Millen constructed their line with an MAOP of 1248psi.

The City of Millen has requested an informal conference to further discuss this matter.

Response Provided by: Johnny Thomas Utility Director Date: 4/24/2026.
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: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes X No

Operator Name: CITY OF Millen **Docket Number: 37069**

Enforcement Action for: **192.181(a)DL23-005/JS25-022** ☐ 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 Millen now has a valve placement procedure located in its Construction Manual. Additionally, Millen is mapping all of its existing valves in its GIS system. Once complete Millen will determine where additional valve needs to be located to minimize the number of customers who could be affected and time it would take to minimize the loss of gas by an incident.

Response Provided by: Johnny Thomas Utility Director Date: 4/24/2026.
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: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes, X No

Operator Name: CITY OF Millen **Docket Number: 37069**

Enforcement Action for: **192.1007(a) 5 DL23-005/ JS25-022** ☐ 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
☐ 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 Millen has begun to utilize gas scanning technology to fully and accurately capture the required information of pipe and fittings installed on their system. This information is then downloaded to their GIS mapping system as well as their work order system.

Response Provided by: Johnny Thomas Utility Director Date: 4/24/2026.

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: _____

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes X No

Operator Name: CITY OF Millen **Docket Number: 37069**

Enforcement Action for: **192.1007 (a) DL23-005/ JS25-022** ☐ 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
☐ 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 Millen has begun to utilize gas scanning technology to fully and accurately capture the required information of pipe and fittings installed on their system. This information is then downloaded to their GIS mapping system as well as their work order system.

Response Provided by: Johnny Thomas Utility Director Date: 4/24/2026.

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: _____

Filings:

For all written responses or any other official correspondence, the Operator shall file the response at the following address:

Mr. Reece McAlister, 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.