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DOCKET# 37090
DOCUMENT# 227414

Docket No. 37090

City of Thomson Gas System
210 Railroad Street
Thomson, GA 30824

REF: Follow Up Inspection # JS25-026

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: John Waller

On August 11, 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 JS25-026 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. 37090 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

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JS25-026

OPERATOR: City of Thomson Gas System

INVESTIGATOR: Jason Smith

INSPECTION DATE: August 11, 2025 REPORT MAILED DATE: July 29, 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
192.473(b)	Each impressed current type cathodic protection system or galvanic anode system must be designed...	JS17-013	5/8/2017
192.616	Public education.	JH20-010	2/24/2020
192.459	External corrosion control: Examination of buried pipeline when exposed.	JS25-027	7/3/2025
192.751	Prevention of accidental ignition.	JS25-027	7/3/2025
192.615(b)(2)	Train the appropriate operating personnel to assure that they are knowledgeable of the emergency...	JS25-027	7/3/2025
192.465(a)	Each pipeline that is under cathodic protection must be tested at least once each calendar year...	JS25-027	7/3/2025
192.473(b)	Each impressed current type cathodic protection system or galvanic anode system must be designed...	JS25-027	7/3/2025
192.475(b)	Whenever any pipe is removed from a pipeline for any reason, the internal surface must be...	JS25-027	7/3/2025

3. CLEARED VIOLATIONS

Cleared on 8/11/2025

Violation	Description	Inspection#	Date
192.195(a)	General requirements. Except as provided in §192.197, each pipeline that is connected to a gas...	JS17-013	5/8/2017
Under Consent Agreement	Operator is under a Consent Agreement.	AT20-002	1/8/2020

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

On August 11-13 Pipeline Safety Staff reported to the City of Thomson to perform a follow-up and a comprehensive inspection on the Natural Gas System.

At the time of this inspection the Operator was represented by:
Trelles 'Tee' Robinson - Gas Superintendent
Chris Cawley - MGAG/SRCS (consultant)
Rodney Dunaway - MGAG / SRCS Training (consultant)

Commission Staff were represented by:
Jason Smith - Lead Inspector
Glen Murphy - Pipeline Safety Inspector
Brian Withrow - Pipeline Safety Inspector

At the time of this inspection the City of Thomson Gas System was under three (3) previously existing probable violations and under a consent agreement identified under Inspection Number AT20-002. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATION CLEARED

1. In regard to the probable violation of 49CFR §192.195(a) which was cited under inspection #JS17-013, in that inspection Staff stated that:

   "Pipeline Safety Staff found that the City of Thomas Gas System has no pressure relieving or pressure limiting devices on the Highway 17 meter station. The Operator is required to provide overpressure protection to prevent their system from exceeding the MAOP on the 400psig feeder line to the gate station.

   PROBABLE VIOLATION: The Operator does not have pressure relieving and/or pressure limiting devices off its tap station line, with Southern Natural, which is the City's take point."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS17-013, received October 5, 2017, the City of Thomson stated:

   "Thomson will install overpressure protection at its takepoint by March 30, 2018."

   FIRST FOLLOW-UP INSPECTION: From May 22-23, 2018, Staff reported to the City of Thomson Gas System to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number DJ18-018) In that inspection Staff stated:

   "During this inspection, (DJ18-018) Staff verified that no overpressure protection has been installed at the take point. The Operator stated that their cathodic protection contractor has found interference with Southern Natural/Kinder Morgan's piping. As a result, the contractor has recommended that the Operator do further testing; after the completion of this testing, the Operator will approach Southern Natural with the prospect of moving the gate station north of its current location. Operator stated this would eliminate not only the interference issue, but also give them a new station with relief."

   SECOND OPERATOR RESPONSE: In their response letter to Inspection Number DJ18-018, received March 5, 2019, the City of Thomson stated:

"By May 15, Thomson will complete the design of its new gate station, after which a schedule for bidding, contracting, and construction will be developed. Thomson will provide this schedule to Staff by June 1."

SECOND FOLLOW-UP INSPECTION: From January 13 to 14, 2020 Staff reported to the City of Thomson Gas System to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number AT20-002) In that inspection Staff stated:

"During this inspection, (AT20-002) Staff found that the Operator is still in progress of completing the new City take point station."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT20-002, dated July 29, 2020, the City of Thomson stated:

"As reported in Thomson's quarterly update of June 2, 2020, Thomson is waiting for Southern Natural/Kinder Morgan to approve an easement, which, according to Southern Natural, should happen soon. Upon approval of the easement, Thomson's contractor will be released to begin work."

THIRD FOLLOW-UP INSPECTION: On August 26, 2020, Pipeline Safety Staff began performing an inspection on the City of Thomson to conduct an inspection of the Operator's Drug and Alcohol misuse plan for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ20-028) In that inspection Staff stated:

"At the time of this inspection the City of Thomson Gas System had seven (7) previously existing probable violations and was operating under a Content Agreement. Because this inspection was conducted with the DER Staff did not review these violations during this inspection."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ20-028, dated December 22, 2020, the City of Thomson stated that:

"As reported in Thomson's quarterly update during the virtual Informal Conference held on December 17, 2020, with the Director, Thomson's contractor is in the process of submitting the final paperwork to Kinder Morgan in preparation for commencement of the take station replacement project. Thomson's contractor will begin this project after the first of the year with completion expected by May 1, 2021. Thomson will notify the Director when the official start date is determined."

OPERATOR UPDATE: On November 5, 2021, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give an update. The Operator had a pre-construction meeting with Southern Natural (a/k/a Kinder Morgan) about the take station replacement project. It is Thomson's hope that the project could get completed in a few weeks.

OPERATOR UPDATE: On January 18, 2022, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give their first 2022 status update. The Operator states: "Now that we have Southern Natural's requested paper work completed, we are waiting for our contractor to schedule the take station replacement project. He is trying to finish up another large project in a sister

city; he hopes to begin our project in April. As you know, this project will correct the need for a relief and the cathodic protection interference issues that we have with Southern Natural."

FOURTH FOLLOW-UP INSPECTION: On March 22, 2022 Pipeline Safety Staff reported to the City of Thomson Gas System to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number JS22-006) In that inspection Staff stated:

"During this inspection the Operator informed Staff that as their January 2022 quarterly update stated, they anticipate the take station project will begin in the coming weeks (May/June 2022). Pipeline Safety Staff will be kept updated."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS22-006, dated March 13, 2023, the City of Thomson stated:

"The City of Thomson has completed all work on the replacement of its takepoint facilities except for installation of a relief valve that is on-order. The delivery date for the relief valve has not been determined."

FIFTH FOLLOW-UP: During this inspection (Inspection Number JS25-026) the Operator informed Staff that the relief valve has been installed. Thomson provided Staff with their 2024 'Relief Valve Inspection' record of the Southern Natural (Kinder Morgan) Gate station where the FlowSafe F7350 relief valve in question was installed. Staff verified the relief valve installation through a field visit.

Staff determined that this probable violation §192.195(a) can be cleared.

PROBABLE VIOLATION CONTINUING

1. In regard to the probable violation of 49CFR §192.473(b) which was cited in Inspection Number JS17-013; in that inspection Staff stated:

   "Operator provided no record of testing performed on its impressed current rectifiers to minimize any adverse effects on existing adjacent underground metallic structures.

   PROBABLE VIOLATION: Operator could not demonstrate that it performed testing on its impressed current rectifiers to minimize any adverse effects on existing adjacent underground metallic structures as required by §192.473(b)."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS17-013, received October 5, 2017, the City of Thomson stated:

   "Thomson's cathodic protection professional will evaluate the rectifiers by December 31. 2017."

   FIRST FOLLOW-UP INSPECTION: From May 22-23, 2018, Staff reported to the City of Thomson Gas System to perform a follow-up inspection of the Operator's previously existing probable violations.

   "During this inspection, (DJ18-018) the Operator provided no record of testing performed on its impressed current rectifiers to minimize any adverse effects on existing adjacent

underground metallic structures. Per Operator, C&C Services is planning to conduct interference testing in the future."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number DJ18-018, received March 5, 2019, the City of Thomson stated:

"Thomson has performed tests and determined that its rectifiers have no adverse effect on existing adjacent underground metallic structures. Documentation is available for review."

SECOND FOLLOW-UP INSPECTION: From January 13 to 14, 2020 Staff reported to the City of Thomson Gas System to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number AT20-002) In that inspection Staff stated:

"During this inspection, (AT20-002) Operator provided records indicating C&C Services had performed rectifier evaluation and inference testing at Wrens Highway Take Station. As a result Operator found that interference with Southern Natural is occurring at this time. The Operator will resolve this issue by replacing their Take Station and installing 800 foot of 8-inch steel and placing an electro stop. In addition Operator will obtain a bond to Southern Natural pipeline."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT20-002, dated July 29, 2020, the City of Thomson stated:

"As reported in Thomson's quarterly update of June 2, 2020, Thomson is waiting for Southern Natural/Kinder Morgan to approve an easement, which, according to Southern Natural, should happen soon. Upon approval of the easement, Thomson's contractor will be released to begin work."

THIRD FOLLOW-UP INSPECTION: On August 26, 2020, Pipeline Safety Staff began performing an inspection on the City of Thomson to conduct an inspection of the Operator's Drug and Alcohol misuse plan for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ20-028) In that inspection Staff stated:

"At the time of this inspection the City of Thomson Gas System had seven (7) previously existing probable violations and was operating under a Content Agreement. Because this inspection was conducted with the DER Staff did not review these violations during this inspection."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ20-028, dated December 22, 2020, the City of Thomson stated that:

"As reported in Thomson's quarterly update during the virtual Informal Conference held on December 17, 2020, with the Director, Thomson's contractor is in the process of submitting the final paperwork to Kinder Morgan in preparation for commencement of the take station replacement project. Thomson's contractor will begin this project after the first of the year with completion expected by May 1, 2021. Thomson will notify the Director when the official start date is determined."

OPERATOR UPDATE: On November 5, 2021, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give an update. Apparently, the Operator had a pre-construction

meeting with Southern Natural (a/k/a Kinder Morgan) about the take station replacement project. It is Thomson's hope that the project could get completed in a few weeks.

OPERATOR UPDATE: On January 18, 2022, the City of Thomson Natural Gas Director sent an e-mail to the Pipeline Safety Director to give their first 2022 status update. The Operator states: "Now that we have Southern Natural's requested paper work completed, we are waiting for our contractor to schedule the take station replacement project. He is trying to finish up another large project in a sister city; he hopes to begin our project in April. As you know, this project will correct the need for a relief and the cathodic protection interference issues that we have with Southern Natural."

FOURTH FOLLOW-UP INSPECTION: On March 22, 2022, Pipeline Safety Staff reported to the City of Thomson Gas System to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number JS22-006) In that inspection Staff stated:

> *"On March 22, 2022, Pipeline Safety Staff reported to the city of Thomson to perform an inspection. At this time the Operator informed Staff that as their January 2022 quarterly updated stated, they anticipate the take station project will begin in the coming weeks (May/June 2022). Pipeline Safety Staff will be kept updated."*

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS22-006, dated March 13, 2023, the City of Thomson stated:

> *"The City of Thomson has completed all work on the replacement of its takepoint facilities except for installation of a relief valve that is on-order. The delivery date for the relief valve has not been determined."*

FIFTH FOLLOW-UP INSPECTION During this inspection (Inspection Number JS25-026) the Operator provided their 2023 and 2024 cathodic protection (CP) surveys for review. At this point it does not appear Thomson Gas System has been checking to see if their CP system is having an adverse effect on adjacent underground metallic structures (example: where the City of Wrens pipeline crosses on Hwy 17 and Howard Mill Road). Thomson Gas System also provided Staff with a 2019 cathodic protection (CP) rectifier groundbed evaluation survey that shows the Operator's seven rectified systems were evaluated. This document did not address the issue. Staff did consult with the Operator and their consultant regarding this matter to guide them in the right direction.

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

2. In regard to the probable violation of 49CFR §192.616 which was cited in Inspection Number JH20-010; in that inspection Staff stated:

> *"Based on the deficiencies identified under Questions 11, 20 and 22 of the Public Awareness Program Effectiveness Inspection Form, the City of Thomson has failed to conduct a Public Awareness Program as required by 49CFR §192.616."*

PROGRAM DEFICIENCIES

a) Question #11 - Liaison with Public Officials;
Do records indicate liaisons established and maintained with appropriate fire, police and other public officials and utility owners in accordance with procedures?

COMMENTS: Staff stated that "A review of records for the last 4 years indicated that not all 4 counties that the City of Thomson has facilities in were included in the liaison records. Operator is a GPERI member, but did not perform liaison with all other emergency responders in Jefferson County."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JH20-010, dated July 29, 2020, the Operator stated:

"Thomson will ensure that liaison is conducted with Public Officials in all four counties in which Thomson has facilities in the future."

FIRST FOLLOW-UP INSPECTION: On August 26, 2020, Pipeline Safety Staff began performing an inspection on the City of Thomson to conduct an inspection of the Operator's Drug and Alcohol misuse plan for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ20-028) In that inspection Staff stated:

"At the time of this inspection the City of Thomson Gas System had seven (7) previously existing probable violations and was operating under a Content Agreement. Because this inspection was conducted with the DER Staff did not review these violations during this inspection."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number DJ20-028, dated December 22, 2020, the Operator stated:

"Thomson will ensure that liaison is conducted with Public Officials in all four counties in which Thomson has facilities in the future."

SECOND FOLLOW-UP INSPECTION: On March 22, 2022 Pipeline Safety Staff reported to the City of Thomson Gas System to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number JS22-006) In that inspection Staff stated:

"On March 22, 2022, Staff reported to the city of Thomson Gas System to follow-up on their previously existing probable violations; under Inspection #JS22-006. The Operator reminded Staff of the documentation they previously sent responding to inspection #DJ21-002. Staff reviewed this documentation, which was e-mail communication from 2020 Thomson Natural Gas had with the city of Wrens Fire Department Chief; giving a brief description and a map showing the location of their gas system in Jefferson County.

On March 31, 2022, the Operator provided Staff with further documentation that they believe would help in addressing the deficiency. Staff reviewed this information, which was e-mail communications of Thomson Natural Gas providing a brief description and a map showing the location of their gas system in Jefferson County to the five County Commissioners and the City of Wrens Fire Department Chief.

While the communication between Thomson Natural Gas and the city of Wrens Fire Department Chief is a step in the direction to clearing up this particular deficiency, Staff questioned if the Operator has more emergency response officials they need to share information with (ex. Jefferson Co. Office of Emergency Management/Homeland Security, Jefferson Co. 911 Emergency Services, Jefferson Co. Sheriff's Office). In order to help

determine what Jefferson County officials Thomson Natural Gas should be communicating with Staff asked the Operator to review their emergency responders and public officials contact list for entities in the Jefferson County area. This contact list would include entities such as the Jefferson Co. EMA Director; the City of Stapleton Mayor; and the City of Wrens Utility Director & City Administrator.

Staff advised the Operator that it appears they have more emergency response officials in Jefferson County to conduct liaison with.

Staff determined that this deficiency could not be cleared at this time."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number JS22-006, dated March 13, 2023, the Operator stated:

"The City of Thomson will review its emergency responder and public officials contact list for completeness and revise as necessary by June 1, 2023."

THIRD FOLLOW-UP INSPECTION: During this inspection #JS25-026, the Operator provided the following records:

2022 - Jefferson County Fire and Sheriff
2023 - Jefferson Co. Fire, Sheriff and 911 Director (James Anderson)
(note: 911 is same as EMA a/k/a Emergency Management Agency - James 'Jim' Anderson who is also Fire Chief)
Thomson has no records for 2024 going to Jefferson County Sherrif.

Staff determined that this deficiency has not been addressed.

b) Question #20 - Measure Understandability of Message Content;
Has the operator determined the percentage of each audience that understood and retained the key information?

COMMENTS: Staff stated that "A review of the records indicate the Operator did not include Emergency Officials in their 2019 four year evaluation. Operator is a GPERI member, but did not perform liaison with all other emergency responders in Jefferson County."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JH20-010, dated July 29, 2020, the Operator stated:

"Thomson will ensure that Emergency Officials in all four counties in which Thomson has facilities are included in future."

FIRST FOLLOW-UP INSPECTION: On August 26, 2020, Pipeline Safety Staff began performing an inspection on the City of Thomson to conduct an inspection of the Operator's Drug and Alcohol misuse plan for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ20-028) In that inspection Staff stated:

"At the time of this inspection the City of Thomson Gas System had seven (7) previously existing probable violations and was operating under a Content Agreement. Because this inspection was conducted with the DER Staff did not review these violations during this inspection."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number DJ20-028, dated December 22, 2020, the Operator stated:

"Thomson will ensure that Emergency Officials in all four counties in which Thomson has facilities are included in future Effectiveness Evaluations."

SECOND FOLLOW-UP INSPECTION: On March 22, 2022 Pipeline Safety Staff reported to the City of Thomson Gas System to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number JS22-006) In that inspection Staff stated:

On March 22, 2022, Staff reported to the City of Thomson Gas System to follow-up on their previously existing probable violations; under Inspection #JS22-006. As stated above for the deficiency for question #11, Thomson Natural Gas did not conduct a thorough liaison with all necessary emergency response officials.

Based on this Staff determined that this deficiency could not be cleared at this time.

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number JS22-006, dated March 13, 2023, the Operator stated:

"The City of Thomson will review its calculation of the percentage of Understandability for Emergency Officials and revise as necessary by June 1, 2023."

THIRD FOLLOW-UP INSPECTION: During this inspection (Inspection Number JS25-026) the Operator was unable to show Staff that they completed a 4-Year Evaluation after the 2019 one that was noted in the JH20-010 PAP inspection. The next 4-Year Evaluation should include the emergency responders in Jefferson County that were previously missed.

Staff determined that this deficiency has not been addressed.

c) Question #22 - Measure Bottom Line Results;
Has the Operator considered other bottom line measures to determine the affected public's perception of the safety of pipelines?

COMMENTS: Staff stated that "A review of the records indicate the Operator failed to measure the affected public's perception of the safety of pipelines. The Operator advised that their contract survey service (APGA Goal program) revised their survey and failed to include this question. Operator advised that this issue is being addressed with their contractor."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JH20-010, dated July 29, 2020, the Operator stated:

"Thomson has advised APGA GOAL Program personnel of this issue and will work with APGA to resolve the problem."

FIRST FOLLOW-UP INSPECTION: On August 26, 2020, Pipeline Safety Staff began performing an inspection on the City of Thomson to conduct an inspection of the Operator's Drug and Alcohol misuse plan for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ20-028) In that inspection Staff stated:

"At the time of this inspection the City of Thomson Gas System had seven (7) previously existing probable violations and was operating under a Content Agreement. Because this inspection was conducted with the DER Staff did not review these violations during this inspection."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number DJ20-028, dated December 22, 2020, the Operator stated:

"Thomson has advised APGA GOAL Program personnel of this issue and will work with APGA to resolve the problem."

SECOND FOLLOW-UP INSPECTION: On March 22, 2022 Pipeline Safety Staff reported to the City of Thomson Gas System to perform a follow-up inspection of the Operator's previously existing probable violations. (Ref. Inspection Number JS22-006) In that inspection Staff stated:

"On March 22, 2022, Staff reported to the city of Thomson Gas System to follow-up on their previously existing probable violations; under Inspection #JS22-006. At the time of this inspection the Operator did not provide a status update on the bottom line measures to determine the affected public's perception of the safety of pipelines.

Staff determined that this deficiency could not be cleared at this time."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number JS22-006, dated March 13, 2023, the Operator stated:

"The City of Thomson will provide a status update on the bottom line measures to determine the affected public's perception of the safety of pipelines."

HIRD FOLLOW-UP INSPECTION: During this inspection (Inspection Number JS25-026) the Operator provided copies of 2020, 2023 & 2024 American Public Gas Association (Blue Otter) Goal Surveys. They contain twelve survey questions, which include questions regarding the affected public's perception of the safety of pipelines.

Staff determined that this deficiency has been addressed.

Since two of the three deficiencies are still remaining, Staff determined that this probable violation 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.

FOLLOW-UP ON TERMS OF CONSENT AGREEMENT

On December 11, 2019. the Commission approved an order for a Consent Agreement with the City of Thomson to recommend a resolution of the issues as discussed in Inspection Reports JL14-048, DL15-007, and JS17-013.

Under the terms of the consent agreement:

1. The City of Thomson shall provide quarterly updates to the Director regarding the status of the cathodic protection system.

   STAFFS COMMENTS: Staff determined that the Operator has been submitting updates to the Director as required.

   Staff determined that the Operator has complied with, and continues to comply with the terms of the consent agreement for this item.

2. The City of Thomson shall construct an underground leak survey station, an inside leak survey station, and a residential meter set station at Thomson's training center.
   a. Approximate cost - $5,000
   b. Projected completion date — 120 days after Commission approval of the Consent Agreement

   This item was noted as being complete during Inspection Number AT20-002.

3. The City of Thomson shall become a member of the Georgia Pipeline Emergency Responders Initiative ("GPERI")
   a. Cost - $1,200 per year for 3 years = $3,600
   b. Status — On-going

   This item was noted as being complete during Inspection Number AT20-002.

4. The City of Thomson shall conduct a one-day basic corrosion class for all Thomson gas department employees. The session would be presented by Thomson's cathodic protection contractor, who is a NACE-Certified Technologist and Inspector, using NACE materials. Thomson agrees to invite the Commission Staff to participate in this class.
   a. Approximate cost - $1,000.00
   b. Projected completion date — 90 days after Commission approval of the Consent Agreement

   FOLLOWUP INSPECTION: During this inspection (JS22-006) Staff noted that this training was conducted in Jan of 2020, and several Staff members attended the training.

   Staff determined that this item has been addressed.

5. The City of Thomson shall construct a cathodic protection training facility at Thomson's training center.
   a. Approximate cost - $5,000
   b. Projected completion date — One year after Commission approval of the Consent Agreement

STAFFS COMMENTS: In Inspection Number JS22-006, conducted on March 22, 2022, Staff was advised that the Operator has completed the construction of their cathodic protection training facility. Staff requested documentation which demonstrated that the Operator had expenditures in excess of $5,000.00. The Operator provided Staff with documentation for purchase orders, but not for expenditures. Staff determined that this item has not been addressed.

During this inspection (Inspection Number JS25-026) the City of Thomson's Gas Superintendent (Trelles 'Tee' Robinson) supplied Staff with documentation (invoices) of what was put into creating the CP training facility. The former gas superintendent, Rodney Dunaway informed Staff that items marked with a red check on the first page of the document provided were used for the CP training facility. He informed Staff that the expenses totaled $3953.39. They also advised that they were able to construct the training facility at a reduced cost because the three rectifiers and the ground bed were gifted to them.

Staff determined that this item has been addressed.

Staff determined that the Operator has complied with all of the terms of the consent agreement.

OPERATOR RESPONSE FORM

Operator Name: City of Thomson

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37090

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 Thomson Gas System	)	**DOCKET NO. 37090**
	)	
	)	
	)	

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

*John Waller, City Manager
City of Thomson Gas System
210 Railroad Street
Thomson, GA 30824

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

Respectfully Submitted this 3rd day of August 2026:

Cathy Nesbitt

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