OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of Grantville Docket Number: 37055

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

Response to Inspection Number: RS24-022

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: Not Applicable
   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
   The City of Grantville acknowledges receipt of the No Violation Letter for this Report.

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of Grantville

Docket Number: 37055

Enforcement Action for: §192.615(a)(4) ☐ 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: In response to the Notice of Probable Violation issued under 49 CFR § 192.615(a)(4), the City of Grantville has implemented corrective measures to ensure that qualified personnel are available at all times to respond to natural gas emergencies.

The City currently has two qualified employees, Alex Boyd and Melvin Stepp, who are available to respond to emergency gas calls. To ensure continuous coverage, these employees participate in a bi-weekly on-call rotation, providing 24-hour emergency response availability.

The current on-call schedule is as follows:

- Melvin Stepp will remain on call through August 5, 2026.
- Alex Boyd will assume on-call responsibilities beginning August 5, 2026.
- The bi-weekly rotation between these two qualified employees will continue until additional personnel complete the qualification process.

The City is currently completing the qualification requirements for three additional employees: Joe Jones, Phil Pittman, and Lucas Pittman. The City anticipates these employees will be fully qualified and available to participate in the on-call rotation by September 16, 2026. Upon completion of their qualifications, the City's on-call roster will expand to include these individuals, further strengthening the City's emergency response capabilities. The specific rotation schedule for these employees has not yet been finalized but will be established before they are assigned on-call responsibilities.

To further improve emergency communications and ensure a reliable notification process, the City of Grantville has purchased a dedicated on-call phone that will serve as the single point of contact for all natural gas emergency notifications. Coweta County 911 will be instructed to contact this designated phone number for all gas-related emergency calls. The on-call phone will be transferred to the employee assigned to the current on-call rotation at the beginning of each rotation period.

The implementation of a dedicated on-call phone eliminates any uncertainty regarding which City employee should be contacted during a gas emergency and ensures that emergency notifications are received directly by the qualified employee currently assigned to on-call duty. As a result, Coweta County 911 will only need to maintain one emergency contact number for the City of Grantville's gas emergency response program.

These actions have been implemented to ensure the availability of qualified personnel and to provide a clear, reliable, and effective process for receiving and responding to natural gas emergencies in accordance with the requirements of 49 CFR § 192.615(a)(4).

Response Provided by: Joe Jones/utility director (Name / Title) Date: 08/03/2026

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.