# OPERATOR RESPONSE FORM

FILED
08/24/2026
Executive Secretary G.P.S.C.

Informal Conference Requested: Yes ☐ No x

Operator Name: The City of Moultrie

Docket Number: 37072

Docket # 37072
Document # 227971

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

Response to Inspection Number: JS25-006

| 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) | | |

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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: The City of Moultrie

Docket Number: 37072

Enforcement Action for: §192.181 ☐ 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 Moultrie (Moultrie) respectfully submits the following as a status to the Continuing Probable Violation of 192.181as cited in Inspection DL22-004. Moultrie has revised its procedure – see attached as Exhibit A

Response Provided by: Zach Poling, Gas Superintendent (Name / Title) Date: 8-24-2026

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: _____

# OPERATOR RESPONSE FORM

Operator Name: The City of Moultrie

Informal Conference Requested: Yes ☐ No x

Docket Number: 37072

Enforcement Action for: 192.625(f) ☐ 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 Moultrie (Moultrie has conducted odorization sampling of the Natural Gas system. Records are attached to ensure compliance and staff review. Moultrie has purchased new odorization sampling equipment, documentation is provided for compliance of 192.625(f). See attached as Exhibit B

Response Provided by: Zach Poling, Gas Superintendent (Name / Title) Date: 8-24-2026

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.

**Distribution Line Valves**

**(Ref. §192.181)**
**(ADB-94-02)**

i. Valves shall be installed on all **high-pressure distribution systems** (systems operating above 7 inches water column) at locations that will **minimize the time required to shut down** each section of the system during an emergency.
ii. In determining valve location and spacing to meet §192.181, for new construction activities and Operations & Maintenance activities where large sections of main are replaced, **The City of Moultrie** shall apply the principles contained in **PHMSA Advisory Bulletin ADB-94-02** and **GPTC Guide Material Appendix G-192.181**. As noted in ADB-94-02, defining exact spacing or number of valves is **not feasible** because **local conditions govern design**. When evaluating design for valve locations, the Operator shall consider the following:
    a) A review of existing valves in the system to determine that existing valve(s) spacing is adequate to minimize the time required to shut down the section in the event of an emergency.
    b) Physical characteristics of the system (pipeline material, pipe size, wall thickness, class location).
    c) Extent and character of the area to be isolated (e.g., wall-to-wall paving, urban development density).
    d) Topographical or access barriers (rivers, major highways, railroads).
    e) Number of valves necessary to isolate a section effectively.
    f) Operating characteristics (operating pressure, pressure-feed relationships, primary feeds into business districts).
    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.

iii. Each **new regulator station** that controls the flow or pressure of gas shall include a **valve installed on the inlet piping** at a distance sufficient to allow valve operation during any emergency that could preclude access to the station. To the extent possible, **The City of Moultrie** will install these valves on the inlet piping at a least 25-feet from the regulator station.

iv. Each **new valve installed on a main** shall be located in a **readily accessible position** with the operating stem or mechanism arranged for **safe, prompt operation** during emergencies. Where valves are installed in **buried boxes or enclosures**, installation must ensure that the box or enclosure **does not transmit external loads** to the pipeline.
Appropriate measures shall be taken to minimize **torsional and bending loads** during valve operation, which may include:

- Use of **low-torque valves**;
- Installation of **protective sleeves or stem extensions**;
- Anchoring or bracing to prevent twisting; and
- Use of **transition fittings** where differing materials are connected.

v. **Documentation**
Records shall be retained as required under 49 CFR Part 192 and made available for review upon request.

**CITY OF MOULTRIE** **RETAIN FOR YOUR RECORDS** **NO. 39525**

| DESCRIPTION | AMOUNT |
|---|---|
| PO: 26-00038 DESC: ODORANT DETECTION SYSTEM<br>INV: 56697 AMT: 7,829.35 | 7,829.35 |

| VENDOR | DIRECT DEPOSIT | CHECK DATE | CHECK AMOUNT |
|---|---|---|---|
| BARTLETT CONTROLS | **********4777 | 10/24/25 | 7,829.35 |

**CITY OF MOULTRIE** **RETAIN FOR YOUR RECORDS** **NO. 39525**

| DESCRIPTION | AMOUNT |
|---|---|
| PO: 26-00038 DESC: ODORANT DETECTION SYSTEM<br>INV: 56697 AMT: 7,829.35 | 7,829.35 |

| VENDOR | DIRECT DEPOSIT | CHECK DATE | CHECK AMOUNT |
|---|---|---|---|
| BARTLETT CONTROLS | **********4777 | 10/24/25 | 7,829.35 |

**DETACH BEFORE DEPOSITING**

**CITY OF MOULTRIE**
COMBINED UTILITY
P.O. BOX 3368
MOULTRIE, GA 31776-3368

FIRST NATIONAL BANK
Moultrie, GA
Combined Utility
64-2041/612

**NO. 39525**

VOID AFTER 90 DAYS

| DATE ISSUED | CHECK NO. | CHECK AMOUNT |
|---|---|---|
| XX/XX/XX | 39525 | * VOID * |

VOID VOID VOID VOID VOID VOID VOID

TO THE ORDER OF:
BARTLETT CONTROLS
PO BOX 400
WAXHAW, NC 28173

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# Certificate of Calibration

Milton Roy/YZ
201 Ivyland Rd
Ivyland, PA 18974
Tech Service 800-344-5399

**Calibration Equipment:**

| Equipment | Serial Number |
|---|---|
| Gas Analyzer | F05007-M |

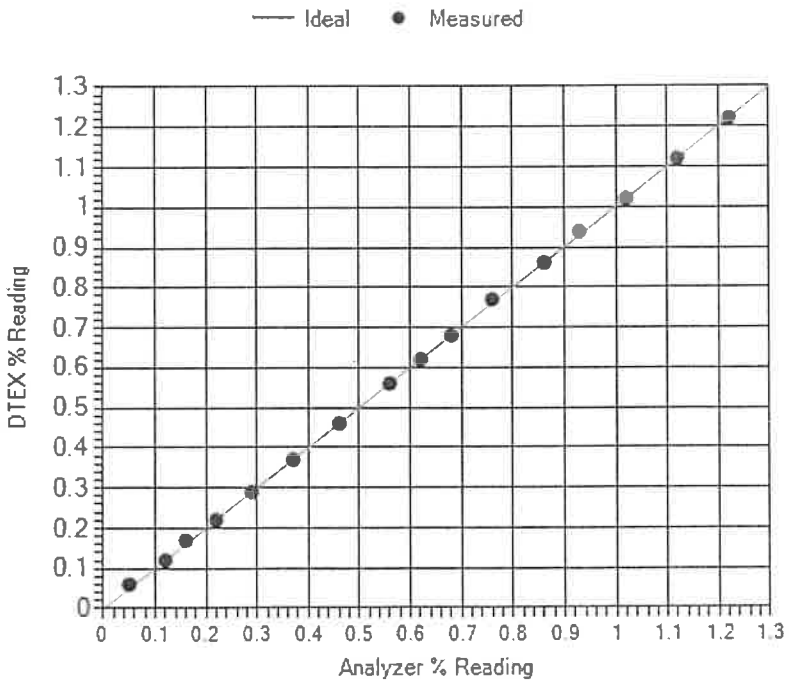
**This DTEX unit has been calibrated to the following procedure:**

TP-0034

**DTEX Unit Information:**

| | |
|---|---|
| Model Number: | DX-1000G |
| DTEX Serial Number: | 02433 |
| Calibration Temp: | 18.4 |
| Calibration Operator: | JC |
| Local Calibration Date: | 10/28/2024 6:55:27 AM |
| Customer Calibration Date: | 10/28/2024 6:55:27 AM |
| Customer Next Cal Date: | 11/27/2026 |

**Instrument Verification:**




The DTEX instrument identified above has been calibrated and approved for use.