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FILED
08/25/2026
Executive Secretary G.P.S.C.

Docket # 37076
Document # 228076

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244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
psc.ga.gov

Docket No. 37076

City of Perry Gas System
P. O. Box 2030
Perry, GA 31069-6030

REF: Follow Up Inspection # GM25-046

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Mr. Robert Smith

On August 25, 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 GM25-046 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. 37076 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

COMMISSIONERS

JASON SHAW , Chairman
LAUREN "BUBBA" McDONALD , Vice-Chairman
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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: GM25-046

OPERATOR: City of Perry Gas System

INVESTIGATOR: Glen Murphy

INSPECTION DATE: August 25, 2025 REPORT MAILED DATE: August 18, 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 Operators previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.181(b)	Each regulator station controlling the flow or pressure of gas in a distribution system must have...	JB22-004	4/18/2022
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	JB22-015	7/11/2022

3. CLEARED VIOLATIONS

Cleared on 8/25/2025

Violation	Description	Inspection#	Date
192.285(d)	Each operator shall establish a method to determine that each person making joints in...	JB22-004	4/18/2022

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF PERRY GAS SYSTEM / FOLLOWUP INSPECTION
INSPECTION NUMBER GM25-046 / DOCKET NUMBER 37076

On August 25, 2025, Staff met with the City of Perry Gas System to perform a follow-up inspection of the Operator's previously existing probable violations from Inspection Number JB22-004.

During this inspection, the Operator was represented by Josh Lairsey, ESG Compliance Specialist.

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

At the time of this inspection, the following NOPV's from Inspection Number JB22-004 also had proposed civil penalties which have not yet been addressed; however, the Operator had an informal conference regarding these penalties on February 7, 2023. (Ref. Inspection Number JB23-005)

Item #	Code / Rule	Description	Proposed Penalty
2	§192.285(d)	Plastic pipe: Qualifying persons to make joints	$5,000.00
6	§192.617	Investigation of failures	$5,000.00
7	§192.625(f)	Odorization of gas	$5,000.00
8	§192.721(b)	Distribution systems: Patrolling	$5,000.00
9	§192.723(b)(1)	Distribution systems: Leakage surveys	$5,000.00
10	§192.747(a)	Valve maintenance: Distribution systems	$5,000.00
11	§192.747(b)	Valve maintenance: Distribution systems	$5,000.00
TOTAL PROPOSED PENALTY			$35,000.00

At the time of this inspection, the City of Perry Gas System under two (2) previously existing probable violations which were cited under Inspection Number JB22-004. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATION CLEARED

In regard to the probable violation of §192.285(d) which was cited in Inspection Number JB22-004; in that inspection Staff stated: "The City of Perry could not demonstrate that personnel performing the joining of PE pipe on their system had been qualified under their procedures as required by §192.285(d)."

Staff proposed a civil penalty of $5,000 for this probable violation

OPERATOR FIRST RESPONSE: In their response letter to Inspection Number JB22-004, dated July 7, 2022, the City of Perry requested an informal conference for this probable violation and stated: "The City of Perry has requalified all employees who fuse plastic pipe. The employees were re-tested for their knowledge, skills, and ability to perform the task(s) and all passed. The proper documentation of the Qualifications and the testing of each sample has been completed."

REVIEW OF OPERATOR RESPONSE: On July 11, 2022 Staff performed a review of the Operators response to Inspection Number JB22-004. (Ref, Inspection Number JB22-015) In that review Staff noted that the Operators response was not acceptable because it failed to address the 21 joints that were identified as being installed by unqualified personnel.

FIRST FOLLOWUP INSPECTION: On August 18, 2022, Staff met on-line with the City of Perry Gas System to perform a review of their responses and a follow-up inspection of the Operator's previously existing probable violations from Inspection Number JB22-004. (Ref. Inspection Number (JB22-025) In that inspection Staff stated: "During this inspection (JB22-025) Staff advised the Operator that their

response was not acceptable because it fails to address the 21 joints that were identified as being installed by unqualified personnel. The Operator advised that all 21 joints are going to be replaced, however, the estimated completion date is currently unknown due to availability of materials."

OPERATORS SECOND RESPONSE: In their response to Inspection Number JB22-025, dated December 8, 2022, the Operator stated: "The City of Perry has requalified all employees who fuse plastic pipe. The employees were re-tested for their knowledge, skills, and ability to perform the task(s) and all passed. The proper documentation of the Qualifications and the testing of each sample has been completed. The City of Perry has also identified all plastic fusion joints that were performed by personnel for which it did not have complete Qualification records and will replace these fusion joints by April 1, 2023. To date, seventeen (17) of the twenty-one (21) identified joints have been addressed by either replacement or visual verification of the joint and correction of the incorrect data."

INFORMAL CONFERENCE: On February 7, 2023 the City of Perry received an informal conformal conference as requestion in their response to Inspection Number JB22-004.

SECOND FOLLOWUP INSPECTION: On February 14, 2023, Staff met with the City of Perry Gas System to perform a review of their responses and a follow-up inspection of the Operator's previously existing probable violations from Inspection Number JB22-004. (Ref. Inspection Number JB23-007) In that inspection Staff stated: "During this inspection the Operator advised that they have one fitting remaining to be replaced. The estimated completion date for the replacement of this fitting is no later than March 1, 2023."

OPERATORS THIRD RESPONSE: In their response to Inspection Number JB23-007, dated July 28, 2023 the operator stated: "The City of Perry has replaced/addressed all identified PE fittings."

THIRD FOLLOWUP INSPECTION: During this inspection (GM25-046) the Operator provided documentation which demonstrated that they have replaced the one remaining fitting.

Staff determined that this violation can be cleared at this time; however, they will still need to address the outstanding civil penalty with the Director.

PROBABLE VIOLATION CONTINUING

In regard to the probable violation of §192.181(b) which was cited in Inspection Number JB22-004; in that inspection Staff stated: "The City of Perry failed to ensure that each regulator station controlling the flow or pressure of gas in a distribution system has a valve installed on the inlet piping at a distance from the regulator station sufficient to permit the operation of the valve during an emergency that might preclude access to the station."

OPERATOR FIRST RESPONSE: In their response letter to Inspection Number JB22-004, dated July 7, 2022, the City of Perry stated: "Prior to the inspection, the City of Perry had identified the regulator stations that did not have a valve located upstream of the station to meet the requirements under 192.l8l(b). Currently. a project is being developed to install the required valves. Once the project is approved. the City of Perry will notify the Facilities Protection Director and Lead Inspector"

REVIEW OF OPERATOR RESPONSE: On July 11, 2022 Staff performed a review of the Operators response to Inspection Number JB22-004. (Ref, Inspection Number JB22-015) In that review Staff noted no issue with the Operators response, but determined that the violation would have to continue until the Operator could demonstrate corrective action.

FIRST FOLLOWUP INSPECTION: On August 18, 2022, Staff met on-line with the City of Perry Gas System to perform a review of their responses and a follow-up inspection of the Operator's previously existing probable violations from Inspection Number JB22-004. (Ref. Inspection Number (JB22-025) In that inspection Staff stated: "During this inspection (JB22-025) the Operator advised that they are still developing a plan to address the installation of inlet valves for the required stations."

OPERATORS SECOND RESPONSE: In their response to Inspection Number JB22-025, dated December 8, 2022, the Operator stated: "Prior to the inspection, the City of Perry had identified the regulator stations that did not have a valve located upstream of the station to meet the requirements under 192.181(b). Currently, a project is being developed to install the required valves. Once the project is approved, the City of Perry will notify the Facilities Protection Director and Lead Inspector."

SECOND FOLLOWUP INSPECTION: On February 14, 2023, Staff met with the City of Perry Gas System to perform a review of their responses and a follow-up inspection of the Operator's previously existing probable violations from Inspection Number JB22-004. (Ref. Inspection Number JB23-007) In that inspection Staff stated: "During this inspection the Operator advised that the project to install these valves is still in development. The tentative deadline for this project is currently July 31, 2023."

OPERATORS THIRD RESPONSE: In their response to Inspection Number JB23-007, dated July 28, 2023 the operator stated:

> "Currently, a project has been developed and approved to install the required valves. The plan of installing the valves is as follows:
> FY 2024 – installation of valves at two (2) stations – #125 Publix Entrance & #120 Airport road
> FY 2025 – installation of valves at three (3) stations – #104 Perry Pkwy, #127 472 Perry Pkwy, and #105 Perimeter Rd
> FY 2026 – installation of valves at three (3) stations – #123 Kings Chapel, #101 Arena Rd, and #112 Industrial Park"

3rd FOLLOWUP INSPECTION: During this inspection the Operator advised that the project to install these valves is still in development. A tentative deadline for this project has currently not been established.

Staff determined that this violation cannot 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.

OPERATOR RESPONSE FORM

Operator Name: City of Perry

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37076

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 Perry Gas System	)	**DOCKET NO. 37076**
	)	
	)	
	)	

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

*Rober Smith, City Manager
City of Perry Gas System
P.O. Box 2030
Perry, GA 31069-6030

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

Respectfully Submitted this _____ day of August 2026:

Cathy Nesbitt

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