FILED
09/15/2026
Executive Secretary G.P.S.C.

Docket # 37061
Document # 228422

APPLICATION FOR SPECIAL PERMIT

UNDER 49 CFR § 190.341

Skyline Heights Distribution System — Continued Operation at 33 psig MAOP

Submitted to

Ms. Sallie Tanner, Executive Secretary

Georgia Public Service Commission

244 Washington Street, SW

Atlanta, Georgia 30334

for transmittal to

Associate Administrator for Pipeline Safety

Pipeline and Hazardous Materials Safety Administration, U.S. Department of Transportation

1200 New Jersey Avenue, SE

Washington, DC 20590

From

City of LaFayette Gas Department

2776 Hwy 27 Bypass

LaFayette, Georgia 30728

Mailing Address: P.O. Box 89 – Farris Street, LaFayette, Georgia 30728

Contact Person: Duran Rowlls, Gas Foreman | 423-595-0849 | drowlls@cityoflafayettega.org

Date: **August 31, 2026**

Application Summary

Pursuant to 49 CFR § 190.341, the City of LaFayette Gas Department submits this application for a special permit authorizing continued operation of the Skyline Heights distribution system at a maximum allowable operating pressure of 33 psig despite incomplete historical material records for certain legacy steel segments within the system.

The Skyline Heights system historically operated at 20 psig. In 2020, the Operator prepared and implemented a staged uprating plan that evaluated increasing the system to 35 psig. During field implementation, however, the pressure that could be sustained at the end of the line without over-pressuring upstream portions of the affected system settled at 33 psig, and that 33 psig level became the established continued operating pressure.

The requested relief is necessary to maintain adequate and reliable service to the Skyline Heights / Highway 136 East area, including existing residential customers and added poultry-house load, while preserving safe continued operation of the Operator's intrastate municipal gas distribution system. The affected area includes approximately 16 poultry houses and 163 residential customers, and Operator consumption information shows that poultry-house consumption totaled 57,607 ccf during January 2026, the coldest month identified by the Operator for this purpose.

Table of Contents

- 1. Introduction and Purpose
- 2. Applicant and Facility Description
- 3. Relief Requested
- 4. Basis for Request and Unique Circumstances
- 5. Engineering and Technical Justification
- 6. Uprating and Operational History
- 7. Alternative Safety Measures
- 8. Leak Surveys and Monitoring
- 9. Public Interest
- 10. Responsibilities and Compliance Oversight
- 11. Documentation and Recordkeeping
- 12. Certification
- 13. Conclusion
- 14. Attachments

1. Introduction and Purpose

Pursuant to 49 CFR § 190.341, the City of LaFayette Gas Department hereby requests a special permit from the Pipeline and Hazardous Materials Safety Administration authorizing the

continued operation of the Skyline Heights distribution system at a maximum allowable operating pressure of 33 psig despite incomplete historical material records for certain legacy steel segments within the system.

The Skyline Heights system historically operated at 20 psig. In 2020, the Operator prepared and implemented a staged uprating plan that evaluated increasing the system to 35 psig in order to address increased gas demand in the Highway 136 East area, including agricultural and residential load.

During field implementation, the Operator did not establish 35 psig as the final continued operating pressure for the affected facilities. Instead, pressure was increased at the regulator station and then observed across the full affected section to determine the pressure that could be sustained at the end of the line without over-pressuring upstream portions of the system. Under those field conditions, the system settled at 33 psig at the end of the line, and 33 psig became the established continued operating pressure for the Skyline Heights facilities. The Operator confirms that the affected facilities have operated continuously at 33 psig since 2020.

This request is therefore not a request to newly uprate the Skyline Heights system, but a request for PHMSA authorization for continued operation at the 33 psig pressure level established after the completed 2020 staged uprating process. Although complete historical material documentation is unavailable for certain legacy steel facilities, the Operator submits that the affected system has been demonstrated by other reliable means to be capable of safe continued operation at 33 psig. Those means include conservative engineering analysis, completed staged uprating activities, successful leak surveys, pressure monitoring, available pressure-test records for polyethylene facilities, and ongoing operating and maintenance controls.

2. Applicant and Facility Description

The applicant is LAFAYETTE UTILITY APT, CITY OF, OPID 11056, a municipal-owned intrastate gas distribution operator serving portions of Walker County, Georgia. The operator's office address is 2776 Hwy 27 Bypass, LaFayette, Walker County, Georgia 30728, and its headquarters mailing address is P.O. Box 89 – Farris Street, LaFayette, Georgia 30728.

The special permit request applies to the Skyline Heights distribution facilities supplied from the regulator station at Skyline Heights, located at approximately 34.6985099, -85.2638231, and extending to the end point at approximately 34.6933541, -85.2083890 along Highway 136. The approximate total length of facilities covered by the permit is 5.8 miles. All covered facilities are located within Walker County, Georgia, and all covered facilities are intrastate facilities.

The affected facilities covered by this application are located in a Class 3 area along Highway 136 and adjacent local roads serving residential and agricultural load. No unusually sensitive areas are known to be present within the affected permit area, and no business-district segments are included.

The affected facilities include legacy steel mains, polyethylene mains, and steel and polyethylene services. Available uprating-plan records identify approximately 587 feet of 3/4-inch steel, 20,214 feet of 2-inch steel, 4,205 feet of 2 1/2-inch steel, and 5,618 feet of 2-inch PE within the facilities addressed by the uprating plan. Services are identified in the uprating plan as either 3/4-inch steel or 5/8-inch PE. Two 4-inch PE laterals serving poultry-house load were pressure-tested to 100 psig at installation.

3. Relief Requested

The Operator seeks special-permit relief primarily from 49 CFR § 192.553(d), and to the extent necessary from the ordinary documentary MAOP basis implicated by § 192.619, for identified Skyline Heights legacy steel distribution facilities operating at 33 psig.

The request relates to the Operator's continued operation of uprated facilities where incomplete legacy steel documentation limits reliance on record evidence alone. The Operator's request is supported by conservative engineering review, completed staged uprating activities, successful leak surveys, pressure monitoring, available pressure-test support for polyethylene facilities, and continuing operating and maintenance controls.

4. Basis for Request and Unique Circumstances

The Skyline Heights system historically operated at 20 psig MAOP. The system was already serving residential customers at that pressure. Over time, additional load in the Highway 136 East area, including poultry-house demand, increased system requirements to the point that the former operating pressure became inadequate to reliably serve both the existing residential customers and the added agricultural load.

The affected area includes approximately 16 poultry houses and 163 residential customers. The Operator experienced low-pressure concerns in winter months after the poultry-house loads were added. Using an estimated residential peak-load allowance of approximately 62.5 cubic feet per hour per residence, the 163 residential customers in the affected area represent approximately 101.9 ccf per hour. Poultry-house consumption in January 2026 totaled approximately 57,607 ccf, or about 77.4 ccf per hour on a monthly average basis. Together, these winter demand indicators support the Operator's position that the former 20 psig operating pressure was inadequate to reliably serve both residential and poultry-house load in the Skyline Heights / Highway 136 East area., the coldest month identified by the Operator for this purpose. The Operator also confirms that low-pressure complaints and operational concerns occurred after the poultry farms were added, usually during winter months.

The addition of the poultry farms necessitated increased capacity. In response, the Operator prepared and implemented a staged uprating plan in 2020. That plan evaluated increasing the system to 35 psig. During actual field implementation, however, the Operator did not establish 35 psig as the final continued operating pressure. Instead, pressure was raised at the regulator station and allowed to settle across the full system to determine the pressure that could be sustained at the end of the line without over-pressuring upstream portions of the affected

facilities. Under those field conditions, the system settled at 33 psig, and 33 psig became the established continued operating pressure. The affected facilities have operated at 33 psig since 2020.

The need for special-permit relief arises because portions of the steel distribution system are legacy facilities for which historical material documentation is incomplete. Certain records relating to wall thickness, grade, and original legacy construction details are incomplete for some of the affected steel facilities. The Operator therefore submits that strict reliance on complete legacy material records is unnecessary in these circumstances because the safety of continued operation at 33 psig is supported by other reliable means, including conservative engineering review, completed staged uprating, leak-survey results, pressure monitoring, and available polyethylene pressure-test documentation. Continued operation under the requested special permit would not be inconsistent with pipeline safety.

5. Engineering and Technical Justification

An engineering review has been performed to evaluate whether the existing steel mains can safely operate at 33 psig. The uprating analysis used conservative assumptions regarding unknown steel characteristics and calculated approximate design pressures as follows: 1,517 psig for 3/4-inch steel; 861 psig for 2-inch steel; 801 psig for 2 1/2-inch steel; and 568 psig for 3-inch steel. These calculations demonstrate that, even under conservative assumptions, the steel pipeline segments have a substantial margin of safety at 33 psig.

For the polyethylene facilities, existing pressure-test records support safe operation. The two 4-inch PE laterals were pressure-tested to 100 psig at installation. Valves on PE mains are rated for at least 35 psig, and steel plug valves in the system are rated well above 33 psig.

Historical operating information also supports the system's legacy basis. A Skyline Heights MAOP verification worksheet reflects a historical 20 psig basis, and regulator history documents 20 psig outlet operation before the 2020 uprating. Available records further identify Blackwrap on legacy steel and epoxy on newer steel placed in service in 1999.

6. Uprating and Operational History

Historical records indicate that the Skyline Heights system operated at 20 psig before the 2020 uprating. A Skyline Heights MAOP verification worksheet reflects a 20 psig historical operating basis. A regulator-relief inspection for the Skyline Heights station also documents 20 psig outlet operation before the uprating.

The 2020 uprating plan provided for a staged pressure increase from 20 psig to 28 psig and then to the proposed uprated pressure, with leak surveys and monitoring between stages. During the uprating process, recording gauges were installed at critical points including Naomi Church, Skyline Heights, and Coffman Springs Road. Leak surveys were conducted before and after each staged pressure increase.

Since 2020, the permit-area system has been leak surveyed four times total, including three surveys in 2020 associated with the uprating and one survey in 2024. No leaks were found during the 2020 uprating process, and no leaks were found on the affected Skyline Heights facilities after the uprating.

Field implementation showed that the pressure that could be sustained at the end of the line without over-pressuring upstream portions of the system was 33 psig. The Operator therefore established 33 psig as the continued operating pressure for the affected Skyline Heights facilities, and those facilities have operated at that pressure since 2020.

7. Alternative Safety Measures

1. Continued operation under this request will be limited to the identified Skyline Heights facilities and will not exceed 33 psig. The Operator will not operate the covered facilities above 33 psig absent further engineering review and any additional regulatory authorization that may be required.
2. The Operator will perform and document leak surveys for the affected Skyline Heights special-permit facilities at least once every four years. This commitment applies as an added safety measure supporting continued operation at 33 psig for covered non-business-district facilities. Any leak indications identified on the covered facilities will be evaluated and repaired in accordance with the Operator's operating and maintenance procedures and applicable regulatory requirements.
3. The Operator will continue to inspect and document the regulator, monitor, and relief devices serving the Skyline Heights facilities at the Highway 136 / Skyline Heights regulator station at least annually.
4. The Operator will maintain a 30-day pressure-recording chart or equivalent logging device associated with the Skyline Heights special-permit facilities at the Skyline Heights regulator station and will retain those records as part of its permit-area documentation.
5. The Operator will retain leak survey records, pressure charts or equivalent pressure-logging records, repair records, engineering support documents, regulator and relief inspection records, and other special-permit compliance documentation for the life of the covered facilities remaining in service under this permit.
6. Qualified Operator personnel will continue to oversee operation, leak surveys, pressure monitoring, and documentation for the covered Skyline Heights facilities.
7. The Operator will continue to cooperate with PHMSA and the Georgia PSC regarding any further reporting, inspection, or permit conditions applicable to the continued operation of the covered Skyline Heights facilities.
8. The enhanced safety measures described in this application apply only to the affected Skyline Heights facilities remaining in service under the special permit

8. Leak Surveys and Monitoring

Leak surveys were conducted before and after each staged pressure increase during the 2020 uprating process. No leaks were found during the uprating process. Any future leak indications will be classified and repaired in accordance with the Operator's operating and maintenance plan and applicable requirements.

Following uprating, the Operator has continued regular leak survey activity and routine pressure monitoring through field observation and static gauge readings. Current pressure monitoring for the affected line consists of static gauges at the regulator station and at the end of line on Highway 136.

As an added safety measure supporting this request, the Operator will maintain a 30-day pressure-recording chart or equivalent logging device at the Skyline Heights regulator station and retain those records as part of its permit-area documentation. Cathodic protection records, regulator and relief inspection records, pressure-test records, and related operating records are maintained and can be made available upon request.

9. Public Interest

Granting the requested special permit would be in the public interest because it would allow the Operator to continue providing adequate and reliable natural gas service to both existing residential customers and poultry-house loads in the Highway 136 East / Skyline Heights area without requiring unnecessary pressure reduction where safe continued operation has already been demonstrated through engineering review, completed staged uprating, leak surveys, and pressure monitoring.

The affected area includes approximately 163 residential customers and 16 poultry houses. The poultry-house loads provide meaningful service demand and operational need, and the record reflects that additional poultry-house load contributed to winter low-pressure problems before the uprating.

Granting the requested relief would preserve reliable service, support the local agricultural economy, and maintain the safety benefits of the Operator's completed uprating, monitoring, and leak-survey measures.

10. Responsibilities and Compliance Oversight

The Operator will maintain responsibility for operation, inspection, monitoring, and compliance for the Skyline Heights system. Overall oversight and compliance will be managed by the Operator through qualified personnel designated by the Gas Department.

Operator personnel will perform leak surveys using approved procedures and equipment. The Gas Department will maintain all documentation related to the uprating and the special permit, and the Operator will communicate with PHMSA and the Georgia PSC regarding this application and any required follow-up.

11. Documentation and Recordkeeping

The Operator will retain all records related to the covered Skyline Heights facilities remaining in service under the special permit for the life of those covered facilities. These records will include, as applicable, leak survey records, pressure charts and monitoring data, 30-day pressure-recording charts or equivalent logging records, work orders and repair records, engineering calculations, available material and test records, customer notification logs, regulator and relief inspection records, and special-permit correspondence and related submissions.

The Operator will maintain records identifying the facilities covered by the special permit, any covered facilities later replaced, abandoned, or otherwise removed from service, and any facilities removed from permit coverage because they have been replaced or otherwise requalified under an independent regulatory basis. These materials will be maintained in paper and electronic form and made available to PHMSA and the Georgia PSC upon request.

12. Certification

The Operator certifies that operation of the covered Skyline Heights facilities under the requested special permit, and subject to the conditions and limitations proposed in this application would not be inconsistent with pipeline safety.

13. Conclusion

For the reasons stated above, the City of LaFayette Gas Department respectfully requests that PHMSA grant a special permit under 49 CFR § 190.341 authorizing continued operation of the Skyline Heights distribution system at a 33 psig MAOP despite incomplete historical material records for certain legacy steel segments within the system.

The Operator is not requesting authority to newly uprate the Skyline Heights system, but rather PHMSA authorization for continued operation at the 33 psig pressure level established after the completed 2020 staged uprating process. Although complete legacy records are unavailable for certain pipe in the ground, the Operator has demonstrated by other reliable means that the affected facilities can safely operate at 33 psig. Those means include conservative engineering analysis, completed staged uprating, successful leak surveys, pressure monitoring, polyethylene pressure-test support, and continuing operating and maintenance controls.

Granting the requested relief would allow the Operator to continue operating at the justified pressure level while maintaining public safety, supporting existing residential service, and preserving the operational and community benefits associated with the added poultry-house load.

14. Attachments

- Attachment A — Skyline Heights Uprating Plan
- Attachment B — System Map(s) and Identification of Affected Facilities
- Attachment C — Pipe Inventory by Available Size, Material, and Service Area Information
- Attachment D — Engineering Calculations Supporting Operation at 33 psig

- Attachment E — Pressure Charts and Recording Gauge Data
- Attachment F — Leak Survey Records and Related Documentation
- Attachment G — Repair Records, Work Orders, and Relevant Maintenance History
- Attachment H — Available Material Records, PE Pressure-Test Documentation, and Related Supporting Records
- Attachment I — Customer / Load Information Supporting Need for Continued 33 psig Operation, Including January 2026 Poultry Consumption Data
- Attachment J — Operating and Maintenance Commitments for Covered Facilities Remaining in Service Under the Special Permit
- Attachment K — Correspondence with the Georgia PSC and Other Relevant Regulatory Materials

Respectfully submitted,

CITY OF LAFAYETTE GAS DEPARTMENT

By: David Hamilton Date: 9/2/26

David Hamilton

City Manager

Uprating Plan & Procedure

For

The City of LaFayette

Dated: 4-23-2020
Revised 6-1-2020

Prepared by

Sapp Engineering & Services

Table of Contents

1 General 3
1.1. Scope 3
1.2. Purpose of Pressure Increase 3
1.3. Pipeline Pressure Information of the City Distribution System 3
1.4. Class Locations in Regard to the Pressure Increase 3
1.5. Review of Requirements Relative to the Proposed MAOP 4
1.6. Description of Facilities 4
1.7. Definition and Assignment of Responsibility for the Uprating Process 5
1.8. Isolation of Adjoining Piping 5
1.9. Maintenance of Pressure in Adjacent Piping 5
1.10. Procedure for Instruction of Personnel 5
1.11. Notification of Affected Customers 5
1.12. Alterations to Pressure Regulation and Pressure Relief Devices 6
1.13. Precautions to Protect Employees and the General Public 6
1.14. Monitoring Pressure in Adjacent Facilities 6
1.15. Final Leak Survey 6
2 Distribution Systems 7
2.1. Sectionalizing Valves 7
2.2. Service Lines to be Uprated 7
2.3. Sources of Gas Supply for all Properties 10
2.3.1. Within the boundaries of the affected area 10
2.3.2. Adjoining the boundaries of the affected area 10
2.4. Inactive Lines which will be Abandoned 10
2.5. Service-Line Valves to be Installed 10
3 Planning & Investigative Studies 10
3.1. Feasibility 10
3.1.1. Review of Pressure Ratings of the Pipeline System Components 10
3.1.2. Leakage History 11
3.1.3. Corrosion History 11
3.1.4. Operating Pressure History 11
3.1.5. Maintenance History 11
3.2. Additional Consideration 11
3.2.1. Analysis of Proposed MAOP in Accordance with §192.553(d) 11
4 Work Preliminary to Uprating 14
4.1. Preliminary Surveys 14
4.1.1. Survey of Service Valves and Service Regulators 14
4.2. Leakage Survey Prior to Increasing Pressure As Applicable Under §192.557(b)(2) 14
4.3. Changes to the System Necessary for Safe Operation 15
4.4. Monitoring Field Pressure 15
4.5. Interface with Sections that are not being Uprated 15
4.6. Customer Notification 15
5 Increasing Pressure 16
5.1. Communication Between all Control Points 16
5.2. Isolation from all Lower Pressure Systems 16
5.3. Pressure Regulation (Service Regulators) 16
5.4. Pressure Increments 16
5.5. Leak Check after Incremental Pressure Increase 16
5.6. Leak Repairs 17
5.7. Monitoring Pressure in Adjacent Facilities 17
5.8. Final Leakage Survey 17
6 Records 17
7 Appendix A – Notice to Customers 19

1 General

1.1. Scope

i. The City of LaFayette has seen an increase in natural gas load in the Hwy 136 East area. To handle this increase in load there is a need to increase the operating pressure for the mains and services downstream of the regulator station at the intersection of Hwy 136 and Skyline Heights. This regulator station feeds mains and services in Hwy 136, Corinth Rd, Dry Creek Road, Greenbush Road, Kemp Road, Brody Drive, York Road, Madden Corner Road, Skylight Heights, Sunset Drive, Alpine Drive, S Crest Dr and Sleepy Hollow Road. See attached map of affected area.

ii. The purpose of this plan is to address probable violation #JS19-013 where the City of LaFayette was cited for possible non-compliance of 49 CFR 192.553(d)(1). The Plan is proposed to ensure that the planned increase in pressure and Maximum Allowable Operating Pressure (MAOP) to the City of LaFayette's natural gas system is completed safely and that the requirements of 49 CFR Sub Part K are met.

iii. This uprating procedure is to be used for this uprating only; LaFayette will establish new uprating procedures should additional uprating be required in the future.

1.2. Purpose of Pressure Increase

i. This pressure increase is needed to better ensure an uninterrupted supply of gas to existing customers and to serve new customers in the Hwy 136 area.

1.3. Pipeline Pressure Information of the City of LaFayette's System

i. Maximum Allowable Operating Pressure (MAOP) prior to the proposed uprating –
   - 20 psig

ii. Existing Pressure prior to the proposed uprating –
   - 20 psig

iii. Amount of Proposed Increase – 15 *psig*

iv. Proposed MAOP – 35 *psig*

1.4. Class Locations in Regard to the Pressure Increase

i. Class 1, Class 2, and Class 3

1.5. Review of Requirements Relative to the Proposed MAOP

i. §§192.621

- All sections are steel or PE.

ii. §192.623

- Not applicable (Applies to Low Pressure Systems)

1.6. Description of Facilities

i. Construction Dates:

- Original steel system – Unknown
- Renewed portions (steel) during SR 136 widening project – Date 1993

ii. Sizes, Wall-Thickness, & Grade of Pipe

- **Main**:
- Steel – (wall thickness and grade unknown)

  ¾" – 587 ft

  2" – 27,869 ft

  2 ½" – 5,715 ft

  3" – 7,070 ft
- PE –

  2" – 5,618 ft
- **Services:**
- Services are ¾" Steel (wall thickness and grade unknown)

  or 5/8" PE

iii. Laterals, Side Connections and other Appurtenances

- There are two main laterals that feed off the section to be uprated.

  1. York Rd – 4" PE main that feeds chicken houses.

  2. Dry Creek Rd/Kemp Rd – 4" PE main that feeds chicken houses.

  Both of these laterals have documentation that they were tested at 100 psig when installed.

1.7. Definition and Assignment of Responsibility for the Uprating Process

i. Definition

ii. Responsibility Assignment(s)

- Duran Rowlls - City of LaFayette – Responsible for overall oversight of the uprating to ensure compliance with 49 CFR Sub Part K and other applicable Federal and State regulations
- Duran Rowlls - City of LaFayette – Responsible for adjustments to regulators to increase the pressure incrementally to the proposed MAOP
- In House – Responsible for performing leakage surveys

iii. Check and Verification

- Prior to beginning the uprating, City of LaFayette Gas Foreman shall ensure that the required items listed in this uprating procedure have been completed
- Upon completion of the uprating City of LaFayette Gas Foreman shall ensure that each item in this uprating procedure have been completed

1.8. Isolation of Adjoining Piping

i. Areas of adjoining piping as listed in section 1.6 (iii) are rated for an MAOP of 60 psig. There are no other areas of adjoining piping.

1.9. Maintenance of Pressure in Adjacent Piping

i. Pressure in Adjacent piping as listed in section 1.6 (iii) will increase as the uprating section is increased.

1.10. Procedure for Instruction of Personnel

i. Section **5** of this plan, entitled "Increasing Pressure" will be reviewed with all personnel associated with this uprating immediately prior to increasing pressure. Every person directly involved in increasing pressure on the system will be provided with a copy of section ***5 or a summarized version of this procedure*** for reference.

1.11. Notification of Affected Customers

i. As soon as practicable prior to the uprating, City of LaFayette will provide notification to the customers of the uprating including a brief description of the process and why the uprating is needed.

1.12. Alterations to Pressure Regulation and Pressure Relief Devices

i. A review of the regulators and relief valve at City of LaFayette's regulator station at Hwy 136 @ Skyline Dr. will be performed to ensure that existing regulators and reliefs meet the requirements of §§192.195 & 195.201

1.13. Precautions to Protect Employees and the General Public

i. In addition to the Communication, Pressure Regulation, and Leak Check provisions of the Uprating Procedure, all City of LaFayette personnel will be advised that a pressure increase is taking place and they will be reminded of appropriate actions to take in the event that a gas leak is reported

1.14. Monitoring Pressure in Adjacent Facilities

i. All Adjacent sections are rated for an MAOP of 60 psig and will not need to be monitored.

1.15. Final Leak Survey

i. See section ***5.8*** of this plan

2 Distribution Systems

2.1. Sectionalizing Valves

i. Not applicable

2.2. Service Lines to be Uprated

1	81	Abney Dr.
2	1	Alpine Dr.
3	3	Alpine Dr.
4	10	Alpine Dr.
5	15	Alpine Dr.
6	16	Alpine Dr.
7	15	Ancel Dr.
8	23	Armstrong Rd.
9	66	Armstrong Rd.
10	132	Bryant Ave
11	70	Bryant Ave.
12	242	Bryant Ave.
13	268	Bryant Ave.
14	279	Bryant Ave.
15	293	Bryant Ave.
16	136	Carlhegwood Dr.
17	42	Cicerow Rd.
18	1863	Coffman Springs Rd
19	129	Cordle Ave
20	124	Corinth Rd.
21	146	Corinth Rd.
22	159	Corinth Rd.
23	262	Corinth Rd.
24	413	Corinth Rd.
25	419	Corinth Rd.
26	540	Corinth Rd.
27	650	Corinth Rd.
28	997	Corinth Rd.
29	1159	Corinth Rd.
30	1199	Corinth Rd.
31	1270	Corinth Rd.
32	1313	Corinth Rd.
33	1365	Corinth Rd.
34	1660	Corinth Rd.
35	1718	Corinth Rd.
36	1749	Corinth Rd.
37	1786	Corinth Rd.
38	1838	Corinth Rd.
39	2127	Corinth Rd.
40	2193	Corinth Rd.
41	2420	Corinth Rd.

42	2642	Corinth Rd. - Church
43	2642	Corinth Rd. - Fellowship Hall
44	2642	Corinth Rd. - Pastorium
45	58	Corinth Rd. - Paul Whitaker
46	31	Dry Creek Rd.
47	64	Dry Creek Rd.
48	79	Duvall Dr.
49	1026	E Villanow St.
50	1040	E Villanow St.
51	1054	E Villanow St.
52	1066	E Villanow St.
53	1071	E. Hwy 136
54	1111	E. Hwy 136
55	1145	E. Hwy 136
56	1165	E. Hwy 136
57	1253	E. Hwy 136
58	1313	E. Hwy 136
59	1421	E. Hwy 136
60	1545	E. Hwy 136
61	1779	E. Hwy 136
62	1817	E. Hwy 136
63	1978	E. Hwy 136
64	2021	E. Hwy 136
65	2156	E. Hwy 136
66	2351	E. Hwy 136
67	2426	E. Hwy 136
68	2519	E. Hwy 136
69	2526	E. Hwy 136
70	2593	E. Hwy 136
71	2749	E. Hwy 136
72	2884	E. Hwy 136
73	2928	E. Hwy 136
74	2939	E. Hwy 136
75	3046	E. Hwy 136
76	3094	E. Hwy 136
77	3132	E. Hwy 136
78	3165	E. Hwy 136
79	3190	E. Hwy 136
80	3334	E. Hwy 136
81	3460	E. Hwy 136
82	3477	E. Hwy 136
83	3582	E. Hwy 136
84	3623	E. Hwy 136
85	3625	E. Hwy 136
86	3684	E. Hwy 136
87	3769	E. Hwy 136
88	3782	E. Hwy 136
89	3805	E. Hwy 136
90	3819	E. Hwy 136

91	3964	E. Hwy 136
92	4038	E. Hwy 136
93	4072	E. Hwy 136
94	4079	E. Hwy 136
95	4123	E. Hwy 136
96	4171	E. Hwy 136
97		E. Hwy 136 - Christ Chapel
98	4171	E. Hwy 136 - Naomi Baptist Church
99	4038	E. Hwy 136 - Naomi School
100	30	Easy St.
101	23	Harris Lane
102	77	Harris Lane
103	140	Harris Lane
104	51	Kemp Rd.
105	9	Ken Visage Rd.
106	176	Lee Mason Rd.
107	26	Mahan Ave
108	50	Mahan Ave
109	57	Mahan Ave
110	227	Mahan Ave
111	278	Mahan Ave
112	350	Mahan Ave
113	3	Morningside Dr.
114	14	Reese Rd.
115	2	Skyline Heights Dr.
116	66	Skyline Heights Dr.
117	200	Skyline Heights Dr.
118	202	Skyline Heights Dr.
119	272	Sleepy Hollow Rd.
120	505	Sleepy Hollow Rd.
121	571	Sleepy Hollow Rd.
122	583	Sleepy Hollow Rd.
123	614	Sleepy Hollow Rd.
124	665	Sleepy Hollow Rd.
125	262	Sleepy Rd.
126	45	Southerland Lane
127	58	Southerland Lane
128	65	Southerland Lane
129	141	Southerland Lane
130	1	Sunrise Dr.
131	5	Sunrise Dr.
132	9	Sunrise Dr.
133	10	Sunrise Dr.
134	11	Sunrise Dr.
135	13	Sunrise Dr.
136	15	Sunrise Dr.
137	17	Sunrise Dr.
138	27	Sunrise Dr.
139	29	Sunrise Dr.

140	31	Sunrise Dr.
141	34	Sunrise Dr.
142	35	Sunrise Dr.
143	1A	Sunrise Dr.
144	1	Sunset Dr.
145	2	Sunset Dr.
146	3	Sunset Dr.
147	4	Sunset Dr.
148	5	Sunset Dr.
149	6	Sunset Dr.
150	7	Sunset Dr.
151	8	Sunset Dr.
152	9	Sunset Dr.
153	10	Sunset Dr.
154	11	Sunset Dr.
155	12	Sunset Dr.
156	13	Sunset Dr.
157	14	Sunset Dr.
158	15	Sunset Dr.
159	16	Sunset Dr.
160	17	Sunset Dr.
161	18	Sunset Dr.
162	99	Turman Dr.
163	118	Turman Dr.

2.3. Sources of Gas Supply for all Properties

2.3.1. Within the boundaries of the affected area

i. Confirmed – All properties are City of LaFayette facilities

2.3.2. Adjoining the boundaries of the affected area

i. Confirmed – Not applicable

2.4. Inactive Lines which will be Abandoned

i. Not applicable

2.5. Service-Line Valves to be Installed

i. None – existing service-line valves meet the requirements of §§192.363 & 192.365

3 Planning & Investigative Studies

3.1. Feasibility

An evaluation of the adequacy of the system design and the feasibility of uprating includes, but is not limited to, the following:

3.1.1. Review of Pressure Ratings of the Pipeline System Components

i. See section ***4.1.1*** below

3.1.2. Leakage History

i. There is no unusual leakage history; the following is a listing of repaired leaks on the sections being uprated as reported on the annual PHMSA Form F7100.1-1

- From 2014 through 2019, there have been no reportable leaks on the sections of pipeline involved in the uprating.

3.1.3. Corrosion History

i. There is no unusual corrosion history

3.1.4. Operating Pressure History

i. Available records indicate that City of LaFayette has operated the sections in the uprating at 20 PSIG since the sections were installed and in operation.

3.1.5. Maintenance History

i. Historically, City of LaFayette has maintained its system using pipeline materials commonly in use in the natural gas industry. Coated steel and PE piping is used for replacements, maintenance, etc. with pressure testing being performed using a minimum of 100 psig air as the test medium on the sections being uprated.

3.2. *Additional Consideration*

3.2.1. *Analysis of Proposed MAOP in Accordance with §192.553(d)*

i. The proposed increase in pressure and MAOP does not exceed the maximum allowed under §§192.619 or 192.621 for a new segment of pipeline constructed of the same materials in the same location

REVIEW OF DESIGN REQUIREMENTS

This section will show the new MAOP of 35 psig is within the pressure limits of all of the components of the pipeline.

STEEL PIPE:

The design pressure for the steel pipe is:
P=2StxFxExT/D

Where
P= Design pressure in psig
S= Yield strength in psig determined in accordance with 192.107
D= Nominal outside diameter of the pipe in inches
t= Nominal wall thickness of the pipe in inches
F= design factor determined in accordance with 192.111
E= Longitudinal joint factor determined in accordance with 192.113

T= Temperature derating factor determined in accordance with 192.115

- **3/4" Pipe**

S= 24,000 psig (Grade Unknown-192.107(b)(2))
D= 1.05 inches
t= 0.083 inches (Wall Thickness is Unknown – for this calculation we used Sch 10 wall thickness which is well below the industry standard for this type of installation)
F= 0.40
E= 1.0
T= 1.0

P= 2x(24,000)x(0.083)x(.40)x(1.0)x(1.0)/1.05
P=1,517 psig

% SMYS
The % SMYS of the new MAOP of 35 psig is:
%SMYS Calculation: D*P/(2*t)/Y*100=%SMYS
D= Outside Diameter of Pipe in inches
P= MAOP in psig
t= Wall Thickness in inches
Y= Yield Strength in pounds

((1.05)x(35)/(2x(0.083))/24000)x100= 0.9% SMYS

- **2" Pipe**

S= 24,000 psig (Grade Unknown192.107(b)(2))
D= 2.375 inches
t= 0.109 inches (Wall Thickness is Unknown – for this calculation we used Sch 10 wall thickness which is well below the industry standard for this type of installation)
F= 0.40
E= 1.0
T= 1.0

P= 2x(24,000)x(.109)x(.40)x(1.0)x(1.0)/2.375
P=881 psig

% SMYS
The % SMYS of the new MAOP of 35 psig is:
%SMYS Calculation: D*P/(2*t)/Y*100=%SMYS
D= Outside Diameter of Pipe in inches
P= MAOP in psig
t= Wall Thickness in inches
Y= Yield Strength in pounds

((2.375)x(35)/(2x(.109))/24000)x100= 1.58% SMYS

- **2 ½" Pipe**

S= 24,000 psig (Grade Unknown-192.107(b)(2))
D= 2.875 inches
t= 0.120 inches (Wall Thickness is Unknown – for this calculation we used Sch 10 wall thickness which is well below the industry standard for this type of installation)
F= 0.40
E= 1.0
T= 1.0

P= 2x(24,000)x(.120)x(.40)x(1.0)x(1.0)/2.875
P=801 psig

% SMYS
The % SMYS of the new MAOP of 35 psig is:
%SMYS Calculation: D*P/(2*t)/Y*100=%SMYS
D= Outside Diameter of Pipe in inches
P= MAOP in psig
t= Wall Thickness in inches
Y= Yield Strength in pounds

((2.875)x(35)/(2x(.120))/24000)x100= 1.74% SMYS

- **3" Pipe**

S= 24,000 psig (Grade Unknown-192.107(b)(2))
D= 3.5 inches
t= 0.120 inches (Wall Thickness is Unknown – for this calculation we used Sch 10 wall thickness which is well below the industry standard for this type of installation)
F= 0.40
E= 1.0
T= 1.0

P= 2x(24,000)x(.120)x(.40)x(1.0)x(1.0)/3.5
P=658 psig

% SMYS
The % SMYS of the new MAOP of 35 psig is:
%SMYS Calculation: D*P/(2*t)/Y*100=%SMYS
D= Outside Diameter of Pipe in inches
P= MAOP in psig
t= Wall Thickness in inches
Y= Yield Strength in pounds

((3.5)x(35)/(2x(.120))/24000)x100= 2.13% SMYS

PE Pipe:

All PE pipe is PE 2406 – SDR 11

VALVES:

All valves in the steel mains are plug valves and are rated for the 35 psig operating pressure. All valves in the PE mains are PE ball valves and are rated for the 35 psig operating pressure.

4 Work Preliminary to Uprating

4.1. Preliminary Surveys

4.1.1. Survey of Service Valves and Service Regulators

i. Prior to the pressure increase, the Gas Foreman shall ensure that a survey is conducted to verify that all service line valves and service regulators meet the requirements of §§192.363, 192.365, 192.197, 192.353, 192.355, & 192.357, taking into consideration the adequacy of existing service regulators regarding the present orifice sizes in relation to the proposed pressure increase.

ii. Date Survey Completed: 5-29- 2020 see appx A

4.2. Leakage Survey Prior to Increasing Pressure As Applicable Under §192.557(b)(2)

I. A system wide leakage survey will be conducted prior to the commencement of the pressure increase

a. All potentially hazardous leaks discovered shall be repaired before the pressure increase may begin; AND

b. All non-hazardous leaks discovered shall be monitored during the pressure increase; Any of these leaks discovered to be potentially hazardous shall be repaired before the next pressure increase, or if discovered during the final increase, those leaks shall be repaired in accordance with GPSC Rule 515-9-1-.05;

ii. Date Initial Leakage Survey Completed: Per §192.557 (b)(2), the section to be uprated was leak surveyed on June 23 2020. Any and all leaks have been repaired – See City of LaFayette Uprating File.

4.3. *Changes to the System Necessary for Safe Operation*

- Presently, there are no known changes necessary prior to the pressure increase.

4.4. *Monitoring Field Pressure*

i. Pressures will be monitored and pressure recorders will be installed at the following locations:

- City of LaFayette Skyline Heights regulator station where the pressure increase will take place
- Locations at the most distant portions of the system:
  - Location: Service Riser at 4171 E. Hwy 136 - Naomi Baptist Church
  - Location: Service Riser at 1863 Coffman Springs Rd

4.5. *Interface with Sections that are not being Uprated*

Not applicable

4.6. *Customer Notification*

i. City of LaFayette will post at the City Hall a notice (See Appendix A) alerting its customers of the planned uprating along with a brief description of why the uprating is taking place and an explanation of what to do should anyone have a gas leak or smell gas.

- Date notice posted at City Hall: 6-23-20, Also on this date, a copy of the notification was delivered to the affected customers.

5 Increasing Pressure

5.1. Communication Between all Control Points

i. Regulator station and remote monitoring locations will communicate by means of:

Cell Phone ☒ Two-Way Radio ☒ Other: _____

ii. Personnel at regulator station:

Name(s): Duran Rowlls

☒ Cell #: 423-595-0849 ☒ Radio # (If applicable):

iii. Personnel at remote monitoring location # 1

Name(s): Chris Lewis

☐ Cell #: 4237627251 ☒ Radio # (If applicable):

iv. Personnel at remote monitoring location # 2

Name(s): Cody Stoker

☐ Cell #: 7069825081 ☒ Radio # (If applicable):

5.2. Isolation from all Lower Pressure Systems

Not applicable

5.3. Pressure Regulation (Service Regulators)

i. A survey of all service regulators has been performed (See Section ***4.1.1***) – All services are capable of receiving the proposed MAOP

5.4. Pressure Increments

i. There will be a total of 2 pressure increments: (192.557 (c))

- The first pressure increase will be from the existing operating pressure of 20 psig to 28 psig.
- The second and final pressure increase will be from 28 psig to 35 psig.

The pressure shall be held constant while the sections being uprated are checked for leaks and the repair of any hazardous leaks (See Section ***5.6***).

5.5. Leak Check after Incremental Pressure Increase

i. There will be a total of 2 leakage surveys.

ii. A leakage survey of all sections being uprated will be performed immediately after the increase in pressure

- Monitoring and other precautions will continue until completion of each leakage survey and the repair of any hazardous leak is completed (See Section ***5.6***)

5.6. *Leak Repairs*

i. Any leak identified during the leakage surveys described above will be graded and addressed in accordance with the Georgia Public Service Commission Leak Standards 515-9-1-.05 (A copy of these standards can be found in City of LaFayette' Emergency and O&M Manuals)

- All hazardous leaks discovered shall be repaired; AND
- All non-hazardous leaks discovered that are not repaired shall be monitored and repaired should it become a hazardous leak

5.7. *Monitoring Pressure in Adjacent Facilities*

i. Not applicable.

5.8. *Final Leakage Survey*

i. At the conclusion of the pressure increase, a leakage survey shall be performed and any leaks discovered shall be addressed as stated in section **5.6** above

6 Records

i. Records of the investigations, the work, and the testing associated with this Uprating Procedure will be maintained for the life of the facility.

The City of LaFayette
Uprating Procedure Checklist

PROCEDURE DESCRIPTION	COMPLETED
Step 1 - Complete gathering information on existing material on all sections to be uprated.	5/29/20
Step 2 - Install recording gauges at remote location #1 and #2	6/29/20
Step 3 - Conduct meeting with all personnel necessary to review plan and assign responsibilities.	5/29/20
Step 4 - Increase pressure to 28 psig	~~8/1/20~~ 8/1/20

Step 5 - Perform leak survey of line at 28 psig. 8/1/20

Step 6 - Repair any leaks found that are hazardous or assign duty to monitor leaks found that are not hazardous. ~~NONE~~ NO LEAKS

Step 7 - Increase pressure on proposed uprating sections to 35 psig 9/16/20

Step 8 - Perform leak survey of line at 35 psig. 9/16/20

Step 9 - Repair any leaks found that are hazardous or assign duty to monitor leaks found that are not hazardous. NO LEAKS

7 Appendix A – Notice to Customers

April 23, 2020

City of LaFayette Customers in the Hwy 136 area

Dear Customers:

SUBJECT: CITY OF LAFAYETTE PRESSURE INCREASE OF ITS DISTRIBUTION SYSTEM

Beginning July, City of LaFayette will be performing a pressure increase of its pressure in the distribution system along Hwy 136. This pressure increase will help ensure an uninterrupted supply of natural gas to existing customers as well as serve new customers in the future.

The pressure increase will take place within the pipelines that City of LaFayette operates. This pressure increase will have no effect on the pressure entering your home/business.

Outside personnel have been brought in to assist the gas department with this task; you may see them throughout the area as they go about performing the work necessary to make this happen.

In the event that you smell gas, or if you think that you smell gas, please call City of LaFayette using the telephone numbers listed below:

During normal business hours Mon-Fri, 8:00am – 5:00pm

City of LaFayette @ 7066391511 or 911

After business hours,

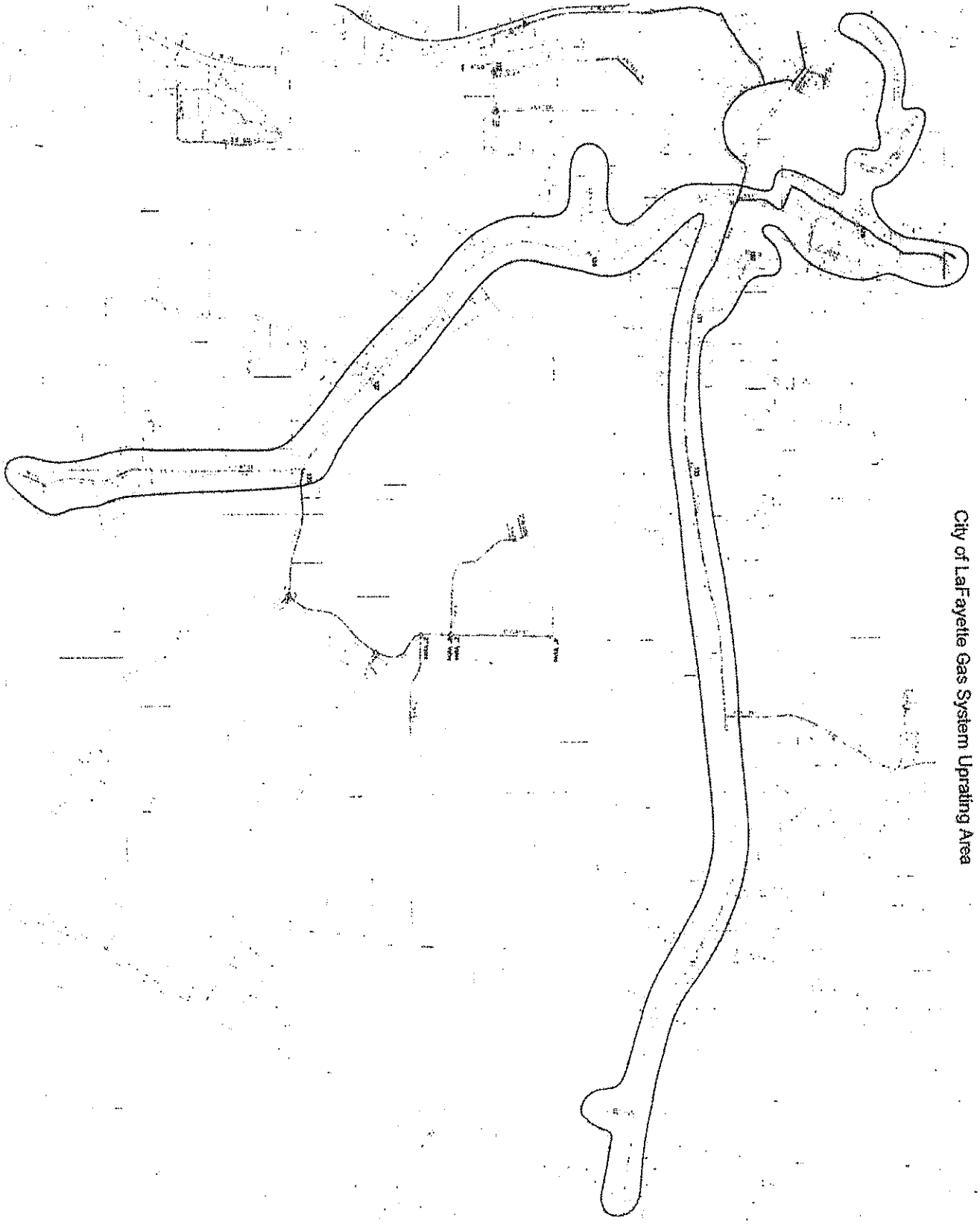
911

If anyone has any questions regarding this process please feel free to give me a call.

Thank you,

Gas Foreman
City of LaFayette

Duran Rowlls



City of LaFayette Gas System Uprating Area

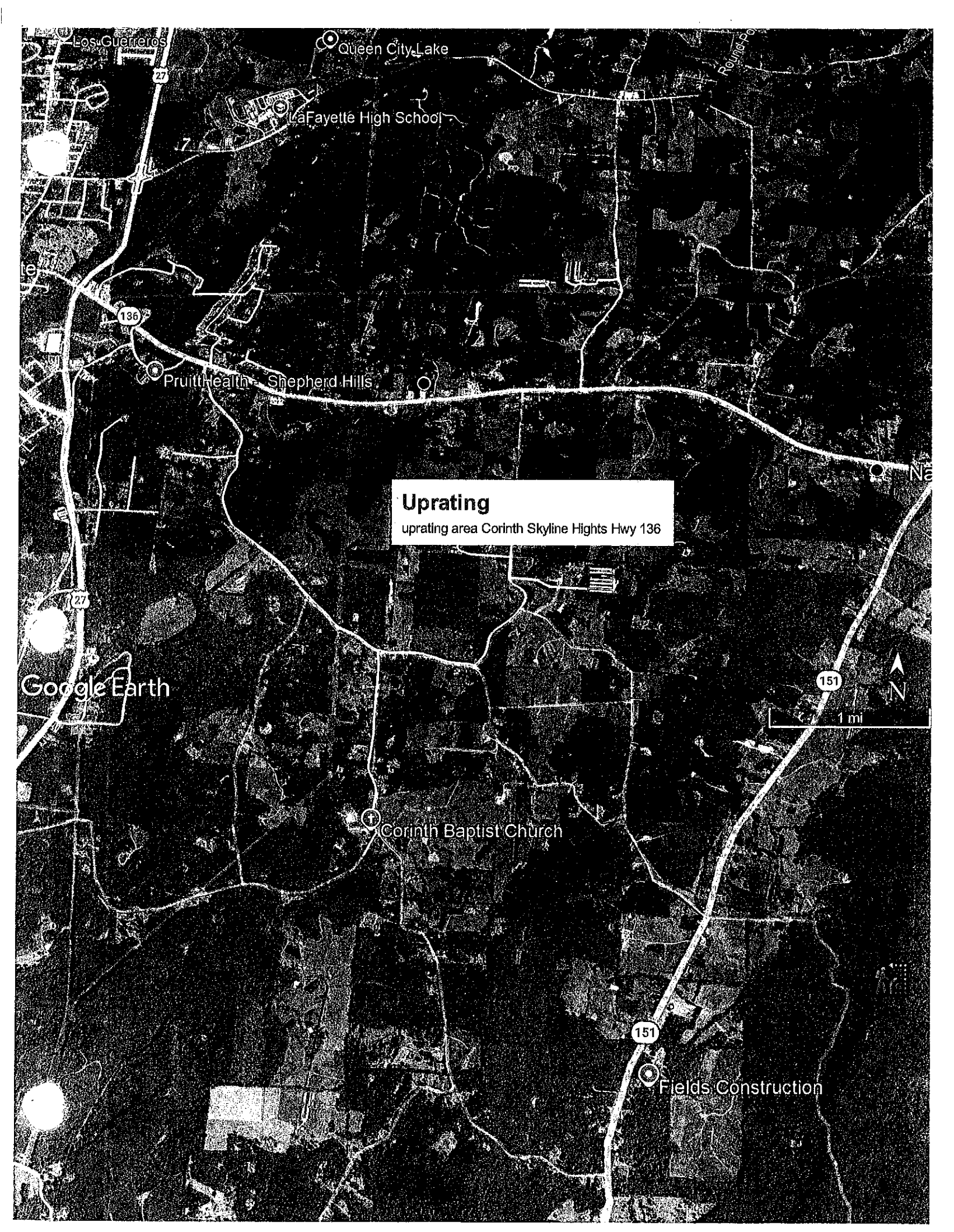
ATTACHMENT B

System Maps and Identification of Affected Facilities

Defines the Skyline Heights / Hwy 136 system boundaries.

Place Behind This Divider:

Uprating Plan map (Page 21); Scan2026-06-09_132157.pdf map pages


Los Guerreros
Queen City Lake
LaFayette High School
Pruitt Health
Shepherd Hills
Uprating
uprating area Corinth Skyline Hights Hwy 136
Google Earth
1 mi
N
Corinth Baptist Church
Fields Construction
27
136
151

ATTACHMENT C

Pipe Inventory and System Description

Identifies system materials, sizes, and service composition.

Place Behind This Divider:

Uprating Plan Section 1.6

1.5. Review of Requirements Relative to the Proposed MAOP

i. §§192.621

- All sections are steel or PE.

ii. §192.623

- Not applicable (Applies to Low Pressure Systems)

1.6. Description of Facilities

i. Construction Dates:

- Original steel system – Unknown
- Renewed portions (steel) during SR 136 widening project – Date 1993

ii. Sizes, Wall-Thickness, & Grade of Pipe

- **Main**:
- Steel – (wall thickness and grade unknown)

  ¾" – 587 ft

  2" – 27,869 ft

  2 ½" – 5,715 ft

  3" – 7,070 ft
- PE –

  2" – 5,618 ft
- **Services:**
- Services are ¾" Steel (wall thickness and grade unknown)

  or 5/8" PE

iii. Laterals, Side Connections and other Appurtenances

- There are two main laterals that feed off the section to be uprated.

  1. York Rd – 4" PE main that feeds chicken houses.

  2. Dry Creek Rd/Kemp Rd – 4" PE main that feeds chicken houses.

  Both of these laterals have documentation that they were tested at 100 psig when installed.

ATTACHMENT D

Engineering Calculations Supporting Operation at 33 psig

Demonstrates that 33 psig is well below calculated design pressures.

Place Behind This Divider:

Uprating Plan Sections 3.2 and Pages 11–14

3.1.2. Leakage History

i. There is no unusual leakage history; the following is a listing of repaired leaks on the sections being uprated as reported on the annual PHMSA Form F7100.1-1

- From 2014 through 2019, there have been no reportable leaks on the sections of pipeline involved in the uprating.

3.1.3. Corrosion History

i. There is no unusual corrosion history

3.1.4. Operating Pressure History

i. Available records indicate that City of LaFayette has operated the sections in the uprating at 20 PSIG since the sections were installed and in operation.

3.1.5. Maintenance History

i. Historically, City of LaFayette has maintained its system using pipeline materials commonly in use in the natural gas industry. Coated steel and PE piping is used for replacements, maintenance, etc. with pressure testing being performed using a minimum of 100 psig air as the test medium on the sections being uprated.

3.2. *Additional Consideration*

3.2.1. *Analysis of Proposed MAOP in Accordance with §192.553(d)*

i. The proposed increase in pressure and MAOP does not exceed the maximum allowed under §§192.619 or 192.621 for a new segment of pipeline constructed of the same materials in the same location

REVIEW OF DESIGN REQUIREMENTS

This section will show the new MAOP of 35 psig is within the pressure limits of all of the components of the pipeline.

STEEL PIPE:

The design pressure for the steel pipe is:
P=2StxFxExT/D

Where
P= Design pressure in psig
S= Yield strength in psig determined in accordance with 192.107
D= Nominal outside diameter of the pipe in inches
t= Nominal wall thickness of the pipe in inches
F= design factor determined in accordance with 192.111
E= Longitudinal joint factor determined in accordance with 192.113

T= Temperature derating factor determined in accordance with 192.115

- **3/4" Pipe**

  S= 24,000 psig (Grade Unknown-192.107(b)(2))
  D= 1.05 inches
  t= 0.083 inches (Wall Thickness is Unknown – for this calculation we used Sch 10 wall thickness which is well below the industry standard for this type of installation)
  F= 0.40
  E= 1.0
  T= 1.0

  P= 2x(24,000)x(0.083)x(.40)x(1.0)x(1.0)/1.05
  P=1,517 psig

  % SMYS
  The % SMYS of the new MAOP of 35 psig is:
  %SMYS Calculation: D*P/(2*t)/Y*100=%SMYS
  D= Outside Diameter of Pipe in inches
  P= MAOP in psig
  t= Wall Thickness in inches
  Y= Yield Strength in pounds

  ((1.05)x(35)/(2x(0.083))/24000)x100= 0.9% SMYS

- **2" Pipe**

  S= 24,000 psig (Grade Unknown192.107(b)(2))
  D= 2.375 inches
  t= 0.109 inches (Wall Thickness is Unknown – for this calculation we used Sch 10 wall thickness which is well below the industry standard for this type of installation)
  F= 0.40
  E= 1.0
  T= 1.0

  P= 2x(24,000)x(.109)x(.40)x(1.0)x(1.0)/2.375
  P=881 psig

  % SMYS
  The % SMYS of the new MAOP of 35 psig is:
  %SMYS Calculation: D*P/(2*t)/Y*100=%SMYS
  D= Outside Diameter of Pipe in inches
  P= MAOP in psig
  t= Wall Thickness in inches
  Y= Yield Strength in pounds

  ((2.375)x(35)/(2x(.109))/24000)x100= 1.58% SMYS

- **2 ½" Pipe**

S= 24,000 psig (Grade Unknown-192.107(b)(2))
D= 2.875 inches
t= 0.120 inches (Wall Thickness is Unknown – for this calculation we used Sch 10 wall thickness which is well below the industry standard for this type of installation)
F= 0.40
E= 1.0
T= 1.0

P= 2x(24,000)x(.120)x(.40)x(1.0)x(1.0)/2.875
P=801 psig

% SMYS
The % SMYS of the new MAOP of 35 psig is:
%SMYS Calculation: D*P/(2*t)/Y*100=%SMYS
D= Outside Diameter of Pipe in inches
P= MAOP in psig
t= Wall Thickness in inches
Y= Yield Strength in pounds

((2.875)x(35)/(2x(.120))/24000)x100= 1.74% SMYS

- **3" Pipe**

S= 24,000 psig (Grade Unknown-192.107(b)(2))
D= 3.5 inches
t= 0.120 inches (Wall Thickness is Unknown – for this calculation we used Sch 10 wall thickness which is well below the industry standard for this type of installation)
F= 0.40
E= 1.0
T= 1.0

P= 2x(24,000)x(.120)x(.40)x(1.0)x(1.0)/3.5
P=658 psig

% SMYS
The % SMYS of the new MAOP of 35 psig is:
%SMYS Calculation: D*P/(2*t)/Y*100=%SMYS
D= Outside Diameter of Pipe in inches
P= MAOP in psig
t= Wall Thickness in inches
Y= Yield Strength in pounds

((3.5)x(35)/(2x(.120))/24000)x100= 2.13% SMYS

PE Pipe:

All PE pipe is PE 2406 – SDR 11

VALVES:

All valves in the steel mains are plug valves and are rated for the 35 psig operating pressure. All valves in the PE mains are PE ball valves and are rated for the 35 psig operating pressure.

4 Work Preliminary to Uprating

4.1. Preliminary Surveys

4.1.1. Survey of Service Valves and Service Regulators

i. Prior to the pressure increase, the Gas Foreman shall ensure that a survey is conducted to verify that all service line valves and service regulators meet the requirements of §§192.363, 192.365, 192.197, 192.353, 192.355, & 192.357, taking into consideration the adequacy of existing service regulators regarding the present orifice sizes in relation to the proposed pressure increase.

ii. Date Survey Completed: 5-29- 2020 see appx A

4.2. Leakage Survey Prior to Increasing Pressure As Applicable Under §192.557(b)(2)

i. A system wide leakage survey will be conducted prior to the commencement of the pressure increase

   a. All potentially hazardous leaks discovered shall be repaired before the pressure increase may begin; AND

   b. All non-hazardous leaks discovered shall be monitored during the pressure increase; Any of these leaks discovered to be potentially hazardous shall be repaired before the next pressure increase, or if discovered during the final increase, those leaks shall be repaired in accordance with GPSC Rule 515-9-1-.05;

ii. Date Initial Leakage Survey Completed: Per §192.557 (b)(2), the section to be uprated was leak surveyed on June 23 2020. Any and all leaks have been repaired – See City of LaFayette Uprating File.

ATTACHMENT E

Pressure Monitoring and Recording Data

Confirms pressure control and monitoring during uprating.

Place Behind This Divider:

Uprating Plan Section 4.4; monitoring locations at 4171 E. Hwy 136 and 1863 Coffman Springs Rd.

4.3. Changes to the System Necessary for Safe Operation

- Presently, there are no known changes necessary prior to the pressure increase.

4.4. Monitoring Field Pressure

i. Pressures will be monitored and pressure recorders will be installed at the following locations:

- City of LaFayette Skyline Heights regulator station where the pressure increase will take place
- Locations at the most distant portions of the system:
  - Location: Service Riser at 4171 E. Hwy 136 - Naomi Baptist Church
  - Location: Service Riser at 1863 Coffman Springs Rd

4.5. Interface with Sections that are not being Uprated

Not applicable

4.6. Customer Notification

i. City of LaFayette will post at the City Hall a notice (See Appendix A) alerting its customers of the planned uprating along with a brief description of why the uprating is taking place and an explanation of what to do should anyone have a gas leak or smell gas.

- Date notice posted at City Hall: 6-23-20. Also on this date, a copy of the notification was delivered to the affected customers.

ATTACHMENT F

Leak Survey and Cathodic Protection Records

Demonstrates leak-free uprating and adequate corrosion protection.

Place Behind This Divider:

Scan2026-06-09_132157.pdf leak survey and CP sheets; uprating leak surveys

ALL of 136 CP Readings
Annual

		1/15/25	1/15/25	ON 1/15/26	OFF 1/15/26
15	LAKESITE DR. @ BOX 35	-2.303	-1.274	-1.837	-0.978
16	LAKESITE DR. PLEDGER PWK. #35	inserted	inserted	—	—
17	PLEDGER PWK AND LANGLEY DR	-2.382	-1.872	-1.904	-0.975
18	HWY 337 BROOMTOWN RD.	-2.81	-1.905	-2.201	-1.007
19	BRONCO RD	-2.248	-1.195	-1.840	-1.112
20	PLEDGER STREET 310	-1.818	-1.341	-1.540	-0.996
21	PATTERSON RD	-1.187	-0.969	-1.256	-1.037
22	SKYLINE HEIGHTS	-1.01	-0.901	-1.258	-1.037
23	ALLEY AT SKYLINE HEIGHTS	-1.175	-0.981	-1.256	-1.037
24	ALLEY AT SKYLINE HEIGHTS	-1.228	-1.057	-1.306	-1.282
25	1421 HWY 136	-1.015	-0.911	-1.030	-0.889
26	YORK RD	-1.178	-0.977	-1.102	-0.968
27	EAST HWY 136 BOX 2426	-1.144	-0.958	-1.282	-1.065
28	HWY136 E. 3623	-1.027	-0.991	-1.150	-1.067
29	EAST 136 (END OF LINE)	-1.019	-0.982	-1.071	-0.949
30	CORINTH ROAD BOX 65	inserted	inserted	—	—
31	CORINTH ROAD / END OF LINE	-1.123	-0.904	-1.094	-0.959

1235939

32	CORINTH ROAD TEST WIRE	-1.004	-0.974	-1.11	-0.875
33	MC LEMORE ST. & DAUGHERTY ST.	-1.399	-1.065	-1.346	-1.234
34	DAUGERTHY ST	-1.476	-0.901	-1.335	-0.975
35	MAGNOLIA	-1.42	-1.03	-1.339	-0.912
36	DAUGHERTY AND THOMPSON ST.	gone	gone	~~~	~~~
37	MAGNOLIA ST END OF LINE	-1.381	-1.189	-1.235	-0.939
38	MAGNOLIA ST RIDGEVIEW CHURCH	-1.467	-1.342	-1.350	-0.932
39	HENDERSON & MAGNOLIA ST.	-1.56	-1.101	-1.548	-1.216
40	MAGNOLIA STREET 412	-1.459	-1.327	-1.377	-0.947
41	Substitute for Master Meter THORNTON BOX 707	inserted	inserted	-1.335	-0.918
42	GLENN	-1.277	-1.016	-1.357	-1.213
43	WARRENFELLS	-1.277	-1.117	-1.267	-1.059
44	COLERAIN	-1.297	-1.192	-1.340	-1.209
45	CAVENDER	-1.356	-0.999	-1.396	-1.089
46	BACK ALLEY OFF WEST MAIN ST	-1.506	-1.472	-1.378	-1.036
47	HWY. 193	-1.365	-1.161	-1.374	-0.995
48	HIGHWAY 193 VENT STACK	-1.188	-1.022	-1.228	-1.176

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	F/S	REMARKS
1		Ridgeview Ch. (Magnolia ST.)		✓		Critical		P	
2		Bethel Mem. Bab. (Pledger ST.)		✓		Critical		P	
3		Fellowship Hall		✓		Critical		P	
4		Calvary Bab. Ch. (908 Bronco Rd.)		✓		Critical		P	
5		old Bdg.		✓		Critical			
6		Corinth Bab. Ch. (Eastview)		✓		Critical		P	NP
7		Fellowship Hall		✓		Critical		-1.170	Coated
8		N.C. School Maint.		✓		Critical		-1.438	Coated
9		Care Mission		✓		Critical		P	
10		" "		✓		Critical		P	
11		Jazzy Junction (105 Simmons)		✓		Critical		P	
		209 S. Chatt. ST. Magnolia Salon		✓		Critical		P	
13		Consistent Care (204 S. Chatt.)		✓		Critical		P	
14		N. Chatt. ST. Pawn Shop (Wardlaw's)		✓		Critical		P	NP
15		Mars Theater		✓		Critical		P	
16		(123 N. Chatt ST.) Chatt. ST. Station House		✓		Critical		P	
17		old City Clinic (Max Spoke)		✓		Critical		P	
18		Steves Quick Mart		✓		Critical		P	
19		The Hair Center (Broom Town Rd.)		✓		Critical		P	
20		Hot Rod Shop (Thurman ST.)		✓		Critical		P	
21		O Bryant Jrs. Co. 816 N. Main		✓		Critical		P	NP
22				✓		Critical		C-1.881	Duplicate
23		Old Cloud 9 vape		✓		Critical		C-1.874	Duplicate
		Heavenly Creations		✓		Critical		P	
		Culberson ST.		✓		Critical		P	Riser

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1		262 Sleepy Hollow		✓		Three		P NP
2		272 Sleepy Hollow		✓		Three		P NP
3		614 Sleepy Hollow		✓		Three		P NP
4		665 Sleepy Hollow		✓		Three		P
5		629 Sleepy Hollow	✓			Three	AG	P Bottom Reg
6		571 Sleepy Hollow		✓		Three		P NP
7		505 Sleepy Hollow		✓		Three		P
8	11-26-24	2 Skyline Heights		✓		Three		P NP
9		Reg Station		✓		Three		C - 1.355
10		66 Skyline Heights		✓		Three		C - 1.372
11		200 Skyline Heights		✓		Three		P
		202 Skyline Heights		✓		Three		P
13		1 Sunrise Dr.		✓		Three		P NP
14		3 Sunrise Dr.		✓		Three		P
15		5 Sunrise Dr.		✓		Three		P NP
16		9 Sunrise Dr.		✓		Three		C - 1.268 NP
17		11 Sunrise Dr.		✓		Three		C - 1.170
18		13 Sunrise Dr.		✓		Three		P NP
19		15 Sunrise Dr.		✓		Three		P
20		29 Sunrise Dr.		✓		Three		P NP
21		35 Sunrise Dr.		✓		Three		
22		1 Sunset Dr.		✓		Three		P NP
23		2 Sunset Dr.		✓		Three		P NP
24		4 Sunset Dr.		✓		Three		P NP
25		8 Alpine Dr.		✓		Three		P Riser
		313 E Villanova		✓				P
		196 Skyline Heights		✓				P
		9 Alpine Drive		✓				P
		Sun Set		✓				P NP

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1		4 Alpine Dr.	✓			Three		P Top cutoff
2		27 Sunrise Dr.		✓		Three		P NP
3		31 Sunrise Dr.		✓		Three		P NP
4		34 Sunrise Dr.		✓		Three		P
5		3 Morningside Dr.		✓		Three		P NP
6		12 Alpine Dr.		✓		Three		P Riser
7		15 Alpine Dr.		✓		Three		P NP
8		10 Alpine Dr.		✓		Three		P NP
9		3 [redacted] Alpine Dr.	✓			Three	AG	P Bottom Reg
10		16 [redacted] Alpine Dr.		✓		Three		P
11		1 [redacted] Alpine Dr.		✓		Three		P
		1026 E. Villanow		✓		Three		P NP
		1040 E. Villanow		✓		Three		P
14		1054 E. Villanow		✓		Three		P NP
15		1106 E. Hwy 136		✓		Three		P NP
16		250 J&J Dr.		✓		Three		P NP
17		251 J&J Dr.	✓			Three	AG	P Top c/o NP
18		42 Cicero Rd.		✓		Three		P NP
19		1866 E. Hwy 136		✓		Three		C ~1.26
20		81 Abney Dr.		✓		Three		P NP
21		95 Abney Dr.		✓		Three		P NP
22		2156 E. Hwy 136		✓		Three		P
23		2426 E. Hwy 136	✓			Three	AG	C ~1330 c/o
24		15 Ancel Dr.		✓		Three		P
25		2526 E. Hwy 136		✓		Three		P
		1110 E. Hwy 136		✓				P NP
		1336 C E. Hwy 136		✓				P
		1978 E Hwy 136		✓		✓		P NP

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1		79 Duvall Dr.		✓		Three		P NP
2		16 Alpine Dr.		✓		Three		P
3		2884 E. Hwy 136				Three		Killed Service
4		3046 E. Hwy 136		✓		Three		P
5		3132 E. Hwy 136		✓		Three		P
6		3146 E. Hwy 136		✓		Three		P
7		3190 E. Hwy 136	✓			Three	AG	P Bottom c/o NP
8		3334 E. Hwy 136		✓		Three		P NP
9		3448 E. Hwy 136		✓		Three		P
10		3582 E. Hwy 136		✓		Three		P Riser
11		3684 E. Hwy 136		✓		Three		P NP
		3782 E. Hwy 136		✓		Three		P NP
13		140 Harris Ln.		✓		Three		P
14		23 Harris Ln.		✓		Three		P NP
15		77 Harris Ln.		✓		Three		P
16		3928 E. Hwy 136		✓		Three		P NP
17		3964 E. Hwy 136		✓		Three		P NP
18		3460 E. Hwy 136				Three		P
19		3582 E. Hwy 136		✓		Three		P Riser
20		4072 E. Hwy 136		✓		Three		P NP
21	Church	4117 E. Hwy 136		✓		Three		P P
22		4123 E. Hwy 136		✓		Three		P
23		4079 E. Hwy 136		✓		Three		P
24		58 Southerland Dr.		✓		Three		P NP
25								

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1		141 Southerland Dr.		✓		Three		P
2		65 Southerland Dr.		✓		Three		P NP
3	—	45 Southerland Dr.	—	—	—	Three		P killed
4		62 Naomi Church Rd.		✓		Three		P
5		135 Carl Hegwood Dr.	✓			Three	AG	P Bottom C/O
6		3819 E. Hwy 136		✓		Three		P NP
7		3805 E. Hwy 136	✓			Three	AG	P Rec b-dy
8	11-27-24	3769 E. Hwy 136		✓		Three		P
9		3623 E. Hwy 136		✓		Three		P
10		3625 E. Hwy 136		✓		Three		P
11		3477 E. Hwy 136		✓		Three		P NP
		3165 E. Hwy 136		✓		Three		P NP
1.		3091 E. Hwy 136		✓		Three		P NP
14		2939 E. Hwy 136		✓		Three		P NP
15		176 Lee Mason Rd.		✓		Three		P NP
16		2749 E. Hwy 136		✓		Three		P NP
17		2593 E. Hwy 136		✓		Three		P NP
18		2519 E. Hwy 136		✓		Three		P
19		2351 E. Hwy 136		✓		Three		[redacted] 718254
20	—	118 Turman Dr.	—	—	—	Three		P killed
21		99 Turman Dr.		✓		Three		P NP
22		2021 E. Hwy 136	✓			Three		P NP Ins. nut
23		9 Visage Rd.		✓		Three		P NP
24		14 Reece Rd.		✓		Three		P NP
25		1817 E. Hwy 136		✓		Three		C cp-1.35 NP
		2835 E Hwy 136		✓				P
		2167 E Hwy 136		✓				P NP

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1	12-2-24	1779 E. Hwy 136		✓				P
2		1545 E. Hwy 136		✓				P
3		1421 E. Hwy 136		✓				P NP
4		293 Bryant Ave.		✓				P
5		1437 E. Hwy 136		✓				P
6		277 Bryant Ave.		✓				P
7		279 Bryant Ave.		✓				P
8		242 Bryant Ave.		✓				P
9		268 Bryant Ave.		✓				P
10		1313 E. Hwy 136		✓				P NP
11		1253 E. Hwy 136		✓				P Riser
12		1165 E. Hwy 136		✓				P NP
13		1145 E. Hwy 136		✓				P NP
14		70 Bryant Ave.						KILLED
15		1111 E. Hwy 136		✓				P NP
16		132 Bryant Ave.		✓				P NP
17		66 Armstrong Rd.		✓				P NP
18		23 Armstrong Rd.		✓				P NP
19		1071 E. Hwy 136		✓				P NP
20		124 Corinth Rd.		✓				P NP
21		146 Corinth Rd.	✓				AG	P Top / bottom c/o
22		262 Corinth Rd.		✓				P
23		26 Mahan Ave.	✓	✓			[illegible]	P [illegible]
24		50 Mahan Ave.		✓				P
25		278 Mahan Ave.		✓				P
		65 Bryant ave		✓				P NP
		456 Corinth Rd		✓				P

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1		350 Mahan Ave.		✓				P
2		227 Mahan Ave.		✓				P
3		57 Mahan Ave.		✓				P
4		540 Corinth Rd.	✓				AG	P C/O
5		650 Corinth Rd.		✓				P
6		1270 Corinth Rd.		✓				P
7	—	58 Corinth Rd.	—	—	—	—	—	P Killed
8		129 Cordle Ave.		✓				P NP
9		1660 Corinth Rd.		✓				P NP
10		1718 Corinth Rd.		✓				C - 1.332
11		1838 Corinth Rd.		✓				P NP
	—	2302 Corinth Rd.	—	—	—	—	—	Killed
13		30 Easy St.		✓				C - 1.345
14		2420 Corinth Rd.		✓				P Riser
15	& Shop	1863 Coffman S Rd.	✓				AG	P House NP / Hot Port / Shop NP
16		2193 Corinth Rd.		✓				P NP
17		2127 Corinth Rd.		✓				P
18		64 Dry Creek Rd.		✓				P NP
19		1365 Corinth Rd.		✓				C - 1.409
20		1313 Corinth Rd.		✓				P
21		1199 Corinth Rd.		✓				P
22		1159 Corinth Rd.		✓				P
23		1267 Corinth Rd.		✓				P NP
24		1749 Corinth Rd.		✓				Riser
25	—	31 Dry Creek Rd.	—	—	—	—	—	P Killed
		2313 Corinth Rd		✓				PRiser

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1		1786 Corinth Rd.	✓				AG	C-1.449 bottom reg
2		997 Corinth Rd.		✓				P
3		419 Corinth Rd.		✓				P
4		413 Corinth Rd.		✓				P
5		159 Corinth Rd.		✓				P NP
6		2167 Corinth Rd.						P
7		1951 Corinth Rd.						
8		63 Dry Creek Rd.	✓					P bottom Reg
9		956 York Rd.	✓				AG	P bottom Reg NP
10		Jerry Hamilton's C			Location			
11		House #4		✓				P
		House #3		✓				P
13		House #2		✓				P
14		House #1		✓				P
15		Mega House #5	✓				AG	P 90° above c/o
16		Mega House #4		✓				P
17		1020 York Rd.		✓				P NP
18		Morrison Cir.		Location				
19		House #1		✓				P
20		House #2		✓				P
21		House #3		✓				P
22		House #4		✓				P NP
23		House #5		✓				P NP
24		House #6		✓				P NP
25		Mack's 102		✓				P NP

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1		104 Morrison Cir.		✓				P NP
2		918 Kemp Rd.		✓				P
3		496 Kemp Rd.		✓				P Riser
4		248 Brody Dr.		✓				P NP
5		102 Brody Dr.		✓				P NP
6		Ridley's Chicken		Location				
7		House #1		✓				P
8		House #2		✓				P
9		House #3		✓				P NP
10		House #4		✓				P
11	11-26-24	19 Sunset Dr.		✓				P
		17 Sunset Dr.		✓				P NP
13		16 Sunset Dr.		✓				P
14		15 Sunset Dr.		✓				P [illegible]
15		14 Sunset Dr.		✓				C C.P-1.369
16		13 Sunset Dr.		✓				P
17		12 Sunset Dr.		✓				P
18		11 Sunset Dr.		✓				P
19		10 Sunset Dr.		✓				P
20		9 Sunset Dr.		✓				P
21		8 Sunset Dr.		✓				P
22		7 Sunset Dr.		✓				P NP
23		6 Sunset Dr.		✓				P NP
24		5 Sunset Dr.		✓				P NP
25								

LEAK SURVEY -

RECORD SHOWING

CP READINGS IN 2019 + 2020

(28)

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE: 12-31-19	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1		141 Southerland Dr.		✓		Three		P NP
2		65 Southerland Dr.		✓		Three		P NP
3	~~~	45 Southerland Dr.	~~~	~~~		Three		P Killed Service
4		62 Naomi Church Rd.		✓		Three		P
5		135 Carl Hegwood Dr.	✓			Three	A/G	P Cut-off
6		3819 E. Hwy 136		✓		Three		P NP
7		3805 E. Hwy 136		✓		Three		P NP
8		3769 E. Hwy 136		✓		Three		P NP
9		3623 E. Hwy 136		✓		Three		P NP
10		3625 E. Hwy 136		✓		Three		P NP
11		3477 E. Hwy 136	✓			Three	A/G	P Reg.
1		3165 E. Hwy 136		✓		Three		P NP
		3091 E. Hwy 136		✓		Three		P
14		2939 E. Hwy 136		✓		Three		P NP
15		176 Lee Mason Rd.		✓		Three		P NP
16		2749 E. Hwy 136		✓		Three		P NP
17		2593 E. Hwy 136		✓		Three		P NP
18		~~2519 E. Hwy 136~~	~~~	~~~		Three		P Tuckers-Buss Dist.
19	~~~	~~2351 E. Hwy 136~~	~~~	~~~		Three		P Killed
20		118 Turman Dr.		✓		Three		P NP
21		99 Turman Dr.		✓		Three		P
22		2021 E. Hwy 136		✓		Three		P NP
23	✓	9 Visage Rd.				Three		P
24		14 Reece Rd.		✓		Three		1,105 NP
25		1817 E. Hwy 136		✓		Three		1,180

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE: 12-31-19	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1		79 Duvall Dr.		✓		Three		P NP
2	12-31-19	~~4 Alpine Dr.~~				Three		P
3		~~8 Alpine Dr.~~				Three		P
4		~~2884 E. Hwy 136~~				Three		Killed Service
5		3046 E. Hwy 136		✓		Three		P
6		3132 E. Hwy 136		✓		Three		P NP
7		3146 E. Hwy 136		✓		Three		P NP
8		3190 E. Hwy 136		✓		Three		P NP
9		3334 E. Hwy 136		✓		Three		P NP
10	✓	3448 E. Hwy 136				Three		P
11		3582 E. Hwy 136		✓		Three		P S.P. NP
12		3684 E. Hwy 136		✓		Three		P
13		3782 E. Hwy 136		✓		Three		P NP
14		140 Harris Ln.		✓		Three		P NP
15		~~23 Harris Ln.~~				Three		P
16		77 Harris Ln.		✓		Three		P
17		3928 E. Hwy 136		✓		Three		P NP
18		3964 E. Hwy 136		✓		Three		P NP
19	✓	3460 E. Hwy 136				Three		P
20		3582 E. Hwy 136		✓		Three		P
21		4072 E. Hwy 136	✓			Three	AG	P Inlet Union
22		4117 E. Hwy 136		✓		Three		P NP
23	12-31-19	4123 E. Hwy 136		✓		Three		P
24		4079 E. Hwy 136		✓		Three		P NP
25	12-31-19	58 Southerland Dr.		✓		Three		P NP

(26)

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1	12-3-19	4 Alpine Dr.	✓			Three	AG	P NP Cut-Off
2		27 Sunrise Dr.		✓		Three		P NP
3		31 Sunrise Dr.		✓		Three		P
4		34 Sunrise Dr.		✓		Three		1,125 NP
5		3 Morningside Dr.		✓		Three		P NP
6		12 Alpine Dr.		✓		Three		P S.P. NP
7		15 Alpine Dr.		✓		Three		P
8		10 Alpine Dr.		✓		Three		P NP
9		13 Alpine Dr.		✓		Three		P
10		3 B Alpine Dr.	✓			Three	AG	P Reg. NP
11		1 Alpine Dr.		✓		Three		P NP
12		1026 E. Villanow		✓		Three		P NP
		1040 E. Villanow		✓		Three		P
14		1054 E. Villanow		✓		Three		P
15		1106 E. Hwy 136	✓			Three	AG	P Reg. NP
16		251 J&J Dr.		✓		Three		P NP
17		42 Cicero Rd.		✓		Three		P
18		1866 E. Hwy 136		✓		Three		1,167 S.P.
19		250 J+J Dr.		✓		Three		P NP
20		81 Abney Dr.		✓		Three		P NP
21	12-3-19	95 Abney Dr.		✓		Three		P NP
22		2156 E. Hwy 136		✓		Three		P
23		2426 E. Hwy 136		✓		Three		1,336 NP
24		15 Ancel Dr.		✓		Three		P
25	✓	2526 E. Hwy 136				Three		P
		8 Alpine Dr,		✓				P

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	P/S	REMARKS
1	12-30-19	262 Sleepy Hollow		✓		Three		P	NP
2	12-	272 Sleepy Hollow		✓		Three		P	NP
3		614 Sleepy Hollow		✓		Three		P	
4		665 Sleepy Hollow		✓		Three		P	NP
5	629	Sleepy Hollow	✓			Three	B/G	P	LEAK on service AT S.P. [redacted] Fixed
6		571 Sleepy Hollow		✓		Three		P	N.P.
7	12-31-19	505 Sleepy Hollow		✓		Three		P	S.P.
8		2 Skyline Heights		✓		Three		P	NP
9	12-	Reg Station	✓			Three	A/G		.1763 couplings Gauge
10		66 Skyline Heights		✓		Three			.1136 NP
11		200 Skyline Heights		✓		Three		P	NP
12		202 Skyline Heights		✓		Three		P	
13		[redacted]				Three			
14		1 Sunrise Dr.		✓		Three		P	NP
15		3 Sunrise Dr.		✓		Three		P	NP
16		5 Sunrise Dr.		✓		Three		P	NP
17		9 Sunrise Dr.		✓		Three			.1195 NP
18		11 Sunrise Dr.		✓		Three			.1162 NP
19		13 Sunrise Dr.		✓		Three		P	NP
20		15 Sunrise Dr.		✓		Three		P	.205 Coated
21		29 Sunrise Dr.		✓		Three		P	NP
22	12-31-19	35 Sunrise Dr.		✓		Three			.1179 NP
23		1 Sunset Dr.		✓		Three		P	NP
24		2 Sunset Dr.		✓		Three			.1133 NP
25	12	4 Sunset Dr.		✓		Three		P	NP

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1		104 Morrison Cir.		✓				P NP
2	✓	918 Kemp Rd.						P
3		496 Kemp Rd.		✓				P S.P.
4		248 Brody Dr.		✓				P
5		102 Brody Dr.		✓				P NP
6		Ridley's Chicken	Houses					
7		House #1		✓				P
8		House #2		✓				P
9		House #3		✓				P
10		House #4		✓				P
11		19 Sunset Dr.		✓				-1.079 NP
12		17 Sunset Dr.		✓				-1.060
13		16 Sunset Dr.		✓				-1.081 NP
14		15 Sunset Dr.	✓				A/C	-.936 Insp. Vlt
15		14 Sunset Dr.		✓				-1.202
16		13 Sunset Dr.		✓				P
17		12 Sunset Dr		✓				P
18		11 Sunset Dr.		✓				-.979 NP
19		10 Sunset Dr.	✓				B/G	P Customers plumbing
20		9 Sunset Dr.		✓				P
21		8 Sunset Dr.		✓				P
22		7 Sunset Dr.		✓				P
23		6 Sunset Dr.		✓				P
24		5 Sunset Dr.		✓				P
25								

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	PS REMARKS
1	1-1-2020	1786 Corinth Rd.		✓				.993
2		997 Corinth Rd.		✓				P NP
3		419 Corinth Rd.		✓				P
4		413 Corinth Rd.		✓				P NP
5		159 Corinth Rd.		✓				P NP
6	✓	2167 Corinth Rd.						P
7		1951 Corinth Rd.		✓				P NP
8		63 Dry Creek Rd.	✓				AG	1.021 CUT-OFF
9		5956 York Rd.		✓				P
10		Jerry Hamilton's Chicken Houses						
11		House #4		✓				P
12		House #3		✓				P
13		House #2		✓				P
14		House #1		✓				P
15	1-1-2020	Mega House #5	✓				AG	P multiple
16		Mega House #6	✓				AG	P multiple
17		1020 York Rd.		✓				P
18	1-6-2020	Morrison Cir.	Macky's	Chicken	Houses:			
19		House #1		✓				P
20		House #2		✓				P
21		House #3		✓				P
22		House #4		✓				P
23		House #5		✓				P NP
24		House #6		✓				P
25		Mack's 102		✓				P NP

(30)

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	REMARKS
1	1-1-2020	350 Mahan Ave.		✓				P
2		227 Mahan Ave.		✓				1.060 NP
3		57 Mahan Ave.		✓				P
4		540 Corinth Rd.		✓				P NP
5		650 Corinth Rd.		✓				P NP
6		1270 Corinth Rd.		✓				P NP
7		58 Corinth Rd.		✓				P S.P.
8	✓	129 Cordle Ave.						P
9		1660 Corinth Rd.		✓				P NP
10		1718 Corinth Rd.		✓				1.072 NP
11		1838 Corinth Rd.		✓				P NP
12		2302 Corinth Rd.		✓				.996 NP
		30 Easy St.		✓				.775 No Insulator
14		2420 Corinth Rd.		✓				P NP
15		1863 Coffman S Rd.		✓				P
16	✓	2193 Corinth Rd.		✓				P NP
17	✓	2127 Corinth Rd.						P
18		64 Dry Creek Rd.		✓				P
19		1365 Corinth Rd.		✓				1.365
20		1313 Corinth Rd.		✓				P
21		1199 Corinth Rd.		✓				P NP
22	1-2-2020	1159 Corinth Rd.		✓				P NP
23		1267 Corinth Rd.		✓				P
24	1-1-2020	1749 Corinth Rd.		✓				.913 S.P.
25		31 Dry Creek Rd.						P

2020 Leak Survey

(29)

LAFAYETTE NATURAL GAS SYSTEM LEAK

AG = ABOVE GROUND
BG = BELOW GROUND

NO.	DATE:	SERVICE LOCATION	POS.	NEG.	Grade	Zone	AG/BG	P/S REMARKS
1	1-2020	1779 E. Hwy 136	✓				A/G	P NP Index
2	1-2020	1545 E. Hwy 136		✓				P NP
3		1421 E. Hwy 136		✓				P NP
4		293 Bryant Ave.		✓				P
5		1437 E. Hwy 136		✓				P NP
6		277 Bryant AVE.		✓				P NP
7		279 Bryant Ave.		✓				P NP
8		242 Bryant Ave.		✓				P
9		268 Bryant Ave.		✓				P
10		1313 E. Hwy 136		✓				P
11		1253 E. Hwy 136		✓				P S.P. NP
1		1165 E. Hwy 136	✓				A/G	P CUT-OFF NP
13		1145 E. Hwy 136		✓				P NP
14		70 Bryant Ave.						P Killed Service
15		1111 E. Hwy 136		✓				P
16		132 Bryant Ave.		✓				P NP
17		66 Armstrong Rd.		✓				P NP
18		23 Armstrong Rd.		✓				P
19		1071 E. Hwy 136	✓				A/G	P Inlet Nipple NP
20		124 Corinth Rd.		✓				P NP
21		146 Corinth Rd.		✓				P NP
22	1-2020	262 Corinth Rd.	✓				A/G	1,205 NP Ins. union
23	1-2020	26 Mahan Ave.		✓				P NP
24	1-2020	50 Mahan Ave.	✓				A/G	P Reg.
25	1-2020	278 Mahan Ave.		✓				P NP

ATTACHMENT G

Repair Records and Maintenance Documentation

Confirms that identified conditions were evaluated and addressed.

Place Behind This Divider:

Scan2026-06-09_132157.pdf repair / maintenance notations; applicable work records

Ingram & ASSOCIATES, INC.

Corrosion Control and Safety
Evaluations for Natural Gas Systems

P.O. Box 14 • Suches, Ga. 30572-0014 • Tel.: 706-747-2020 • Fax: 706-747-2024

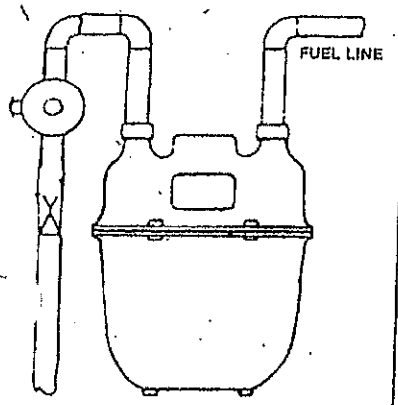
Address 4 Sunset Dr.
City/County La Fayette State GA.
District Zone

Page No.
Field Case No.
Date 1-6-2015

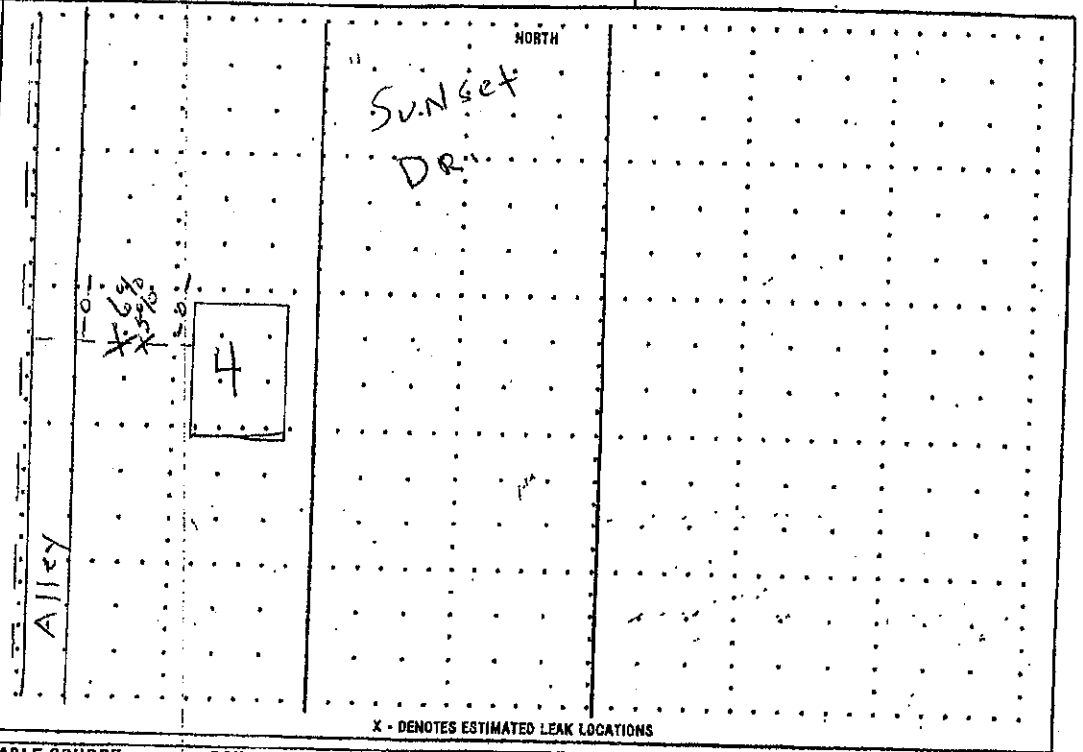
GRADE OF CASE
SUMMARY

GRADE 1
GRADE 2
GRADE (3)

METER SET
Meter No. IF INSPECTED



INSIDE ☐ OUTSIDE ☐



X - DENOTES ESTIMATED LEAK LOCATIONS

DETECTED BY		COLLECTING		PROBABLE SOURCE		SOIL		VENTED C.G.I. TEST		PRESSURE		SURFACE		PIPE & SIZE	
Mobile Flame Pack		In Building		Main		Rock		Gas %	6%	Low		Lawn	✓	Steel	✓
Flame Pack	✓	Near Bldg.		Service	✓	Cinders		L.E.L. %		I.P.	✓	Soil		Plastic	
Visual/Vegetation		In Man Hole		Service Tap		Clay	✓	P.P.M.		High		Paved		Cast Iron	
Combustible Meter	✓	In Soil		Valve		Loam		Negative		Transmission		Other		Other	
Odor		In Air	✓	Meter Set		Sand									
Other		Other		Other		Other									

REMARKS - VEGETATION DAMAGE

Leak appears to be on service to 4 Sunset Dr. Venting to atmosphere. Marked with yellow paint approx. 50 ft. out from R. Sere

AREA LOCATION: COMMERCIAL ☐ INDUSTRIAL ☐ RESIDENTIAL ☑ RURAL ☐

TECHNICIAN Jamie Stillwell GUIDE Tim Coker, Mike Leming

GAS COMPANY DATA

LEAK CAUSE		COMPONENT & EXPLANATION			PART OF SYSTEM		PIPE & SIZE		REPAIR DATA	
Corrosion		Pipe			Transmission		Steel ✓	3/4	Number of Leaks	1
Side Force		Valve			Main		Cast Iron		Bare	✓
Construction Defect		Fitting			Service	✓	Ductile Iron		Coated	
Material Failure		Drip			Meter Set		Copper		Date Repaired: 2-12-15	
Other	✓	Regulator			Customer Pipe		Plastic		Date Rechecked: 3-16-15	
		Top Connection			Other		Other		Positive ☐ Negative ☐	
		Other								

PRINTERS & OFFICE SUPPLIES INC.

s Distribution

Conduct Leak Survey

W.O. #: 13360

e Originated: 2/13/2015 Date Wanted: 2/13/2015 Assigned To: Received By: Glenn, Careomy

Service Location

dress: 5 SUNRISE DR	City: LAFAYETTE	State: GA	Zip: 30728
n:	Phase:	Lot:	Block:
treet:	Location Detail:		
ween Intersection 1:	And Intersection 2:		

ACCOUNT NUMBER:	SYSTEM	Meter #:		ERT #	
First Name	Last Name	Home Phone	Work Phone	Mobile Phone	Customer Home?

Problem Description/Work Request

CLOSED

eak Survey (inserted)

CBlann 3/16/15

Leak Information

Leak Source	Leak Field Case #:	Date First Noticed	Time First Noticed	Leak Inside or Outside?	Is Noise of Gas Escaping Present?

Leak Cause	Date Cleared	Cleared By	Leak Location	Leak Grade

Job Site Information

Main Size: 2"	Material Type: Steel	Main Depth Feet: 2'	Inches: 6"	Ft.	Main Location From Curb Of:

Leak or Service is Ft.	From Curb Of	Test Pressure Line PSI: 35	Lbs.: 100	Min.: 20	Residual Gas? ND

Pipeline Data

Facility Type:	Type of Pipe:	Condition of Pipe:	Type of Corrosion:	Max Pit Depth:	Type of Coating:	Int. Corr. Present?	System Type:
Main	Steel	Good	NONE	N/A	Blk. Wrap	No	Dect.

Service Insulated		Type of Riser		Cathodic Protection		
Main	Riser	Anodeless	Others:	C.P. Reading	Before	After
Anodes Number	Size	✓		Main	-1.347	-1.400
		Odorant Level	Excess Flow Valve	Service	-1.265	
		Readily Detectable	600	Test Wire		

Main Construction				Service Construction			
				Size	Material	Length	Service Installation
Removed				3/4"	Galv.	85FT.	
Installed				5/8"	Plastic	85FT.	

Meter Information

	Meter Nbr.	ERT Nbr.	Mfg. Name	Mfg. Nbr.	Meter Size	# of Dials	Meter Reading	Regulator Size
Existing Meter:	13584494	25180336			275	4	0273	043
New Meter:								

Conduct Leak Survey

W.O. #: 13360

Planner Comment

Crew Information

Task Description (Work Activity):	Work Order Status	Start Date	Due Date	Complete Date
erform Leak Survey	UNASSIGNED	2/13/2015	2/13/2015	2-13-15

Crew Comment:

Leak on Service Line.
Inserted

Jim Coker

ob Cost (Labor/Material/Equipment)

ip ID	Reg Hrs	Ovt Hrs	Dbl Hrs	Delay Code	Delay Time	Part ID	Qty	Equipment ID	Hrs

D.R
Supervisor Signature

Date: 3-16-15

CS
Superintendent

as Distribution

Conduct Leak Survey

W.O. #: 13358

te Originated: 2/12/2015 | Date Wanted: 2/12/2015 | Assigned To: | Received By: Glenn, Careomy

Service Location

Address: 4 SUNSET DR | City: LAFAYETTE | State: GA | Zip: 30728

Subdivision: | Phase: | Lot: | Block:

Street: | Location Detail:

Between Intersection 1: | And Intersection 2:

ACCOUNT NUMBER:	SYSTEM	Meter #:		ERT #	
First Name	Last Name	Home Phone	Work Phone	Mobile Phone	Customer Home?

Problem Description/Work Request

Leak Survey (Inserted)

CLOSED

Glenn 3/16/15

Leak Information

Leak Source	Leak Field Case #:	Date First Noticed	Time First Noticed	Leak Inside or Outside?	Is Noise of Gas Escaping Present?

Leak Cause	Date Cleared	Cleared By	Leak Location	Leak Grade

Job Site Information

Main Size: 2" | Material Type: Steel | Main Depth Feet: 2' Inches: 6" Ft. | Main Location From Curb Of:

Leak or Service is Ft. From Curb Of | Test Pressure Line PSI: 35 Lbs.: 100 Min.: 20 | Residual Gas? NO

Pipeline Data

Facility Type:	Type of Pipe:	Condition of Pipe:	Type of Corrosion:	Max Pit Depth:	Type of Coating:	Int. Corr. Present?	System Type:
Main	Steel	Good	NONE	N/A	Blk. Wrap	No	Rect.

Service Insulated		Type of Riser		Cathodic Protection		
_ Main	_ Riser	Anodeless	Others:	C.P. Reading	Before	After
Anodes Number	Size	✓		Main	-1.285	-1.305
		Odorant Level	Excess Flow Valve	Service	-1.264	
		Readily Detectable	800	Test Wire		

Main Construction

	Size	Material	Length	Type of Installation
Retired				
Installed				

Service Construction

	Size	Material	Length
Retired			
Installed	3/4"	GALV.	120 FT.
	5/8"	Plastic	120 FT.

Meter Information

	Meter Nbr.	ERT Nbr.	Mfg. Name	Mfg. Nbr.	Meter Size	# of Dials	Meter Reading	Regulator Size
Existing Meter:	13938729	25146377			275	4	3507	043
New Meter:								

Conduct Leak Survey

W.O. #: 13358

Planner Comment

Crew Information

Task Description (Work Activity):	Work Order Status	Start Date	Due Date	Complete Date
erform Leak Survey	UNASSIGNED	2/12/2015	2/12/2015	2-12-15

Crew Comment:

Leak on Service Line
Inserted

Jim Coker

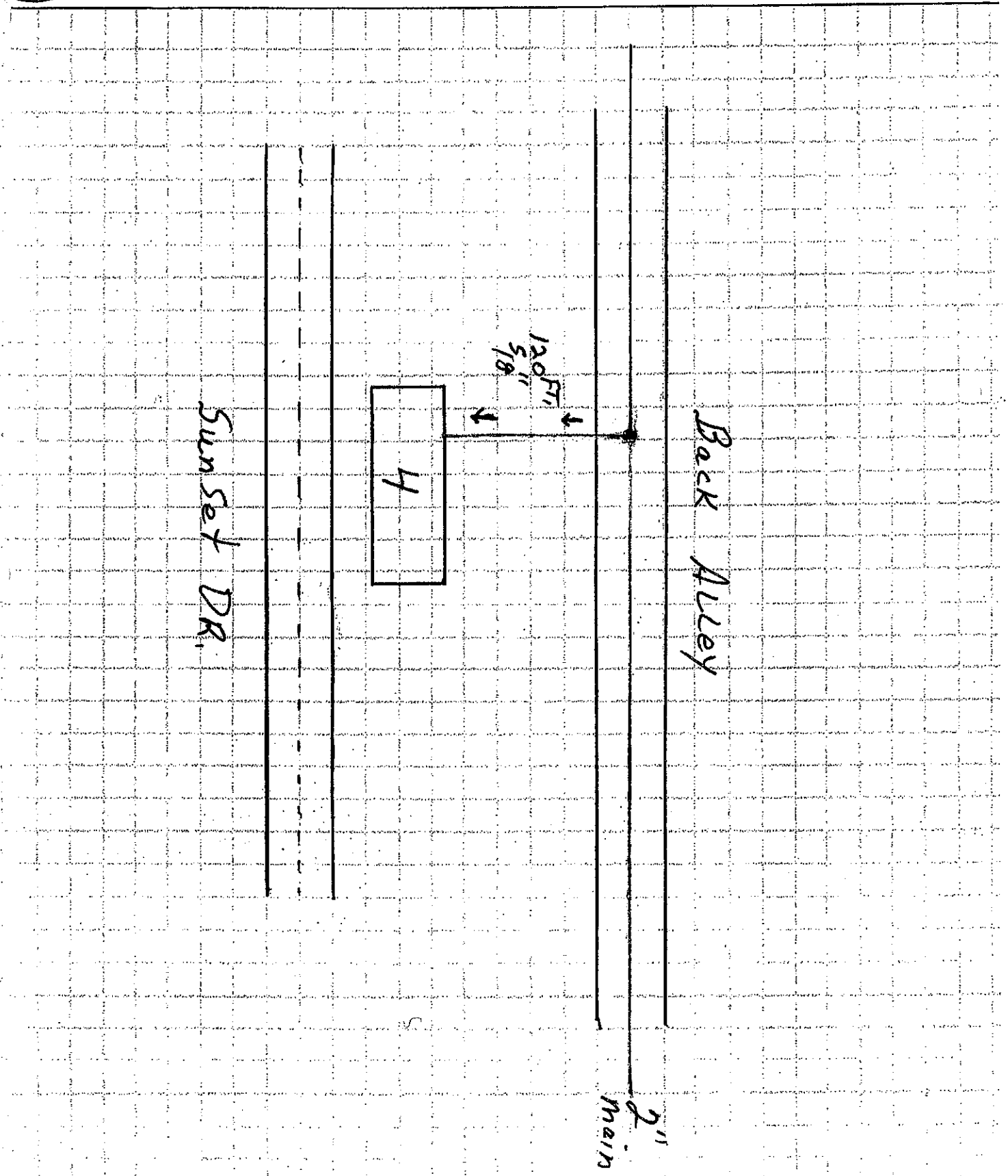
ob Cost (Labor/Material/Equipment)

ip ID	Reg Hrs	Ovt Hrs	Dbl Hrs	Delay Code	Delay Time	Part ID	Qty	Equipment ID	Hrs

D.R.
Supervisor Signature

Date: 3-16-15

Superintendent


Sunset DR.
4
120 FT
5/8"
Back Alley
2" Main

85' 8"
5
Back Alley
Sunrise DR.
2' min.

Ingram & ASSOCIATES, INC.

Corrosion Control and Safety
Evaluations for Natural Gas Systems

P.O. Box 14 • Suches, Ga. 30572-0014 • Tel.: 706-747-2020 • Fax: 706-747-2024

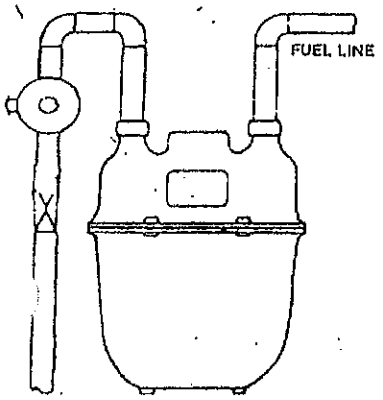
Address 5 SUNRISE Dr.
City/County La Fayette State GA
District ZONE

Page No.
Field Case No.
Date 1-6-2015

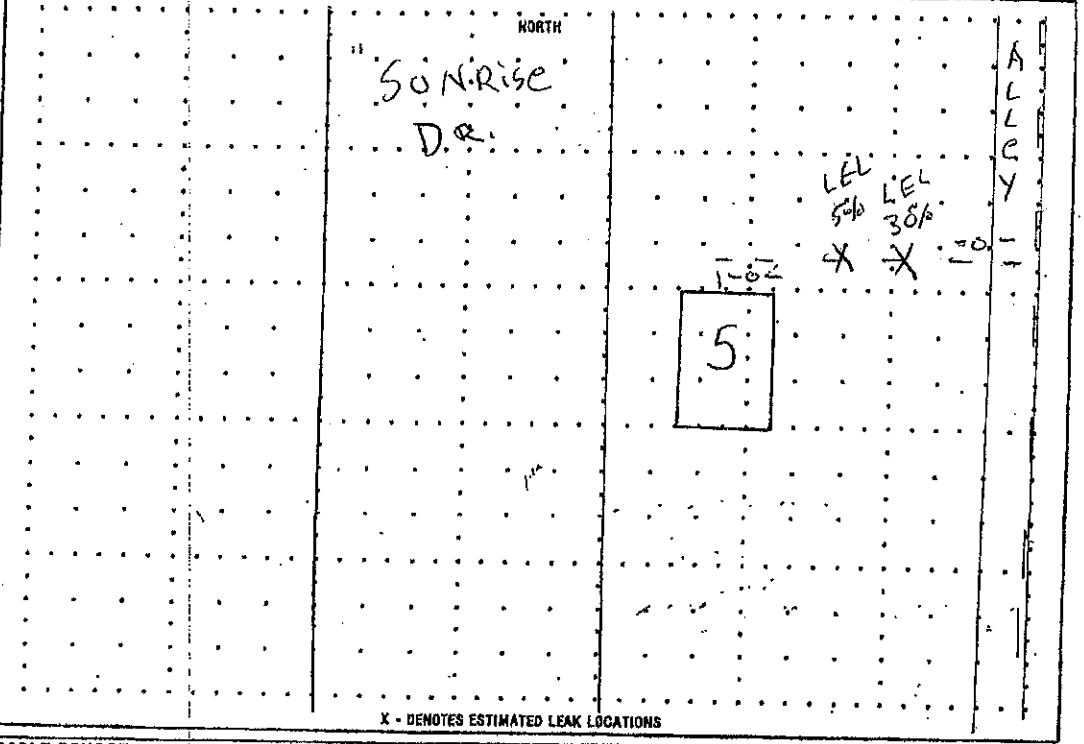
GRADE OF CASE
SUMMARY

GRADE 1
GRADE 2
GRADE (3)

METER SET
Meter No. IF INSPECTED



INSIDE ☐ OUTSIDE ☐



X - DENOTES ESTIMATED LEAK LOCATIONS

DETECTED BY		COLLECTING		PROBABLE SOURCE		SOIL		VENTED C.G.I. TEST		PRESSURE		SURFACE		PIPE & SIZE	
Mobile Flame Pack		In Building		Main		Rock		Gas %		Low	✓	Lawn	✓	Steel	✓
Flame Pack	✓	Near Bldg.		Service	✓	Cinders		L.E.L. %	30%	I.P.		Soil		Plastic	
Visual/Vegetation	✓	In Man Hole		Service Tap		Clay	✓	P.P.M.		High		Paved		Cast Iron	
Combustible Meter	✓	In Soil		Valve		Loam		Negative		Transmission		Other		Other	
Odor		In Air	✓	Meter Set		Sand									
Other		Other		Other		Other									

REMARKS - VEGETATION DAMAGE

Leak appears to be on service to 5 SUNRISE Dr. venting to atmosphere. Visual vegetation evident, approx. 6 ft. aff Rock wall.

AREA LOCATION: COMMERCIAL ☐ INDUSTRIAL ☐ RESIDENTIAL ☑ RURAL ☐

TECHNICIAN Jamie Stillwell GUIDE Tim Coker, Mike Leming

GAS COMPANY DATA

LEAK CAUSE		COMPONENT & EXPLANATION			PART OF SYSTEM		PIPE & SIZE		REPAIR DATA	
Erosion		Pipe			Transmission		Steel ✓	3/4	Number of Leaks	1
Side Force		Valve			Main		Cast Iron		Bare	✓
Construction Defect		Fitting			Service	✓	Ductile Iron		Coated	
Material Failure		Drip			Meter Set		Copper		Date Repaired: 2-13-15	
Other		Regulator	✓		Customer Pipe		Plastic		Date Rechecked: 3-16-15	
		Top Connection			Other		Other		Positive ☐ Negative ☑	
		Other								

V:\PRINTERS\4 OFFICE\FORM.IEC.WPF 7/99/03 10:10

Gas Distribution | **Conduct Leak Survey** | **W.O. #: 13359**

Date Originated: 2/12/2015 | Date Wanted: 2/12/2015 | Assigned To: | Received By: Glenn, Careomy

Service Location

Address: 3477 E 136 HY	City: LAFAYETTE	State: GA	Zip: 30728
Subdivision:	Phase:	Lot:	Block:
Street:	Location Detail:		
Between Intersection 1:	And Intersection 2:		

ACCOUNT NUMBER:	SYSTEM	Meter #:		ERT #	
First Name	Last Name	Home Phone	Work Phone	Mobile Phone	Customer Home?

Problem Description/Work Request

Leak Survey (repaired leak at no blow cap)

CLOSED

C Glenn 3/16/15

Leak Information

Leak Source	Leak Field Case #:	Date First Noticed	Time First Noticed	Leak Inside or Outside?	Is Noise of Gas Escaping Present?

Leak Cause	Date Cleared	Cleared By	Leak Location	Leak Grade

Job Site Information

Main Size: 2" | Material Type: Steel | Main Depth Feet: 3' Inches: 2" | Main Location Ft. | From Curb Of:

Leak or Service Is Ft. | From Curb Of | Test Pressure Line PSI: 33 Lbs.: | Min.: | Residual Gas?

Pipeline Data

Facility Type:	Type of Pipe:	Condition of Pipe:	Type of Corrosion:	Max Pit Depth:	Type of Coating:	Int. Corr. Present?	System Type:
Main	Steel	Good	None	N/A	Blk. Wrap	No	Rec't.

Service Insulated		Type of Riser		Cathodic Protection		
_ Main	_ Riser	Anodeless	Others:	C.P. Reading	Before	After
Anodes Number	Size	✓		Main	-.595	
		Odorant Level	Excess Flow Valve	Service		
		Readily Detectable		Test Wire		

Main Construction

Size	Material	Condition	Coating	Installation
Coated				
Insulated				

Service Construction

Size	Material	Condition	Coating	Installation
Coated				
Insulated				

Meter Information

	Meter Nbr.	ERT Nbr.	Mfg. Name	Mfg. Nbr.	Meter Size	# of Dials	Meter Reading	Regulator Size
Existing Meter:	13939001	53649482			275	4	6336	043
New Meter:								

Conduct Leak Survey

W.O. #: 13359

Planner Comment

Crew Information

Task Description (Work Activity):	Work Order Status	Start Date	Due Date	Complete Date
Perform Leak Survey	UNASSIGNED	2/12/2015	2/12/2015	2-12-15

Crew Comment:

Cap leaking AT No Blow.
Retightened cap. OK.

Jim Coker

Job Cost (Labor/Material/Equipment)

Reg. Hrs.	Ovt. Hrs.	Dbl. Hrs.	Delay Code	Delay Time	Part ID	Qty.	Equipment	Hrs.

D.R
Supervisor Signature

Date: 3-16-15

CCH
Superintendent

E.
Hwy. 136 E.
34477
2 1/2 Miles
W.
S.

Ingram & ASSOCIATES, INC.

Corrosion Control and Safety Evaluations for Natural Gas Systems

P.O. Box 14 • Suches, Ga. 30572-0014 • Tel.: 706-747-2020 • Fax: 706-747-2024

Address 3477 Hwy 136 E.

City/County LaFayette State GA.

District ZONE

Page No.

Field Case No.

Date 1-7-2015

GRADE OF CASE
SUMMARY

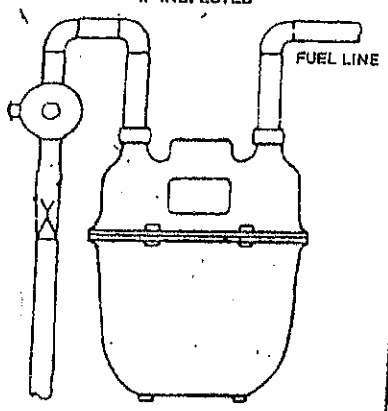
GRADE 1

GRADE 2

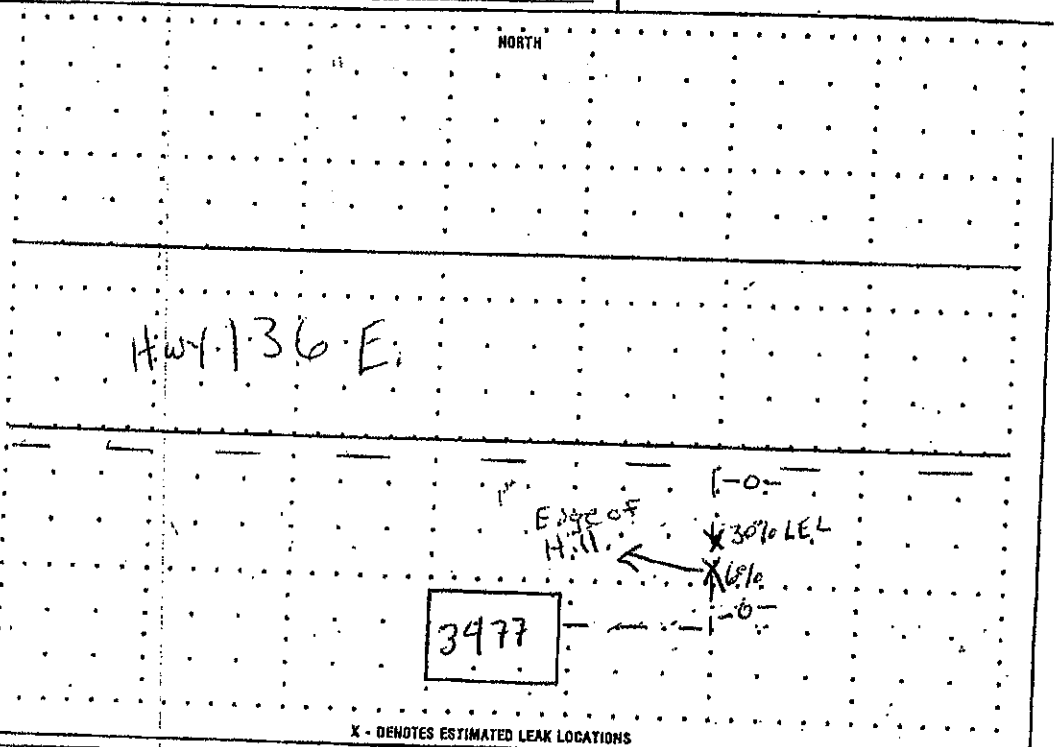
GRADE 3

METER SET

Meter No. IF INSPECTED



INSIDE ☐ OUTSIDE ☐



X - DENOTES ESTIMATED LEAK LOCATIONS

DETECTED BY		COLLECTING		PROBABLE SOURCE		SOIL		VENTED C.G.I. TEST		PRESSURE		SURFACE		PIPE & SIZE	
Mobile Flame Pack		In Building		Main		Rock		Gas %	b/e	Low	✓	Lawn	✓	Steel	
Flame Pack	✓	Near Bldg.		Service	✓	Cinders		L.E.L. %		I.P.		Soil	✓	Plastic	✓
Visual/Vegetation		In Man Hole		Service Tap		Clay	✓	P.P.M.		High		Paved		Cast Iron	
Combustible Meter	✓	In Soil		Valve		Loam		Negative		Transmission		Other		Other	
Odor		In Air	✓	Meter Set		Sand									
Other		Other		Other		Other									

REMARKS - VEGETATION DAMAGE

Leak appears to be on service to 3477 Hwy. 136 E. as the hill declines down to the main, venting to atmosphere.

AREA LOCATION: COMMERCIAL ☐ INDUSTRIAL ☐ RESIDENTIAL ☑ RURAL ☐

TECHNICIAN Jamie Stillwell GUIDE Tim Coker, Mike Leming

GAS COMPANY DATA

LEAK CAUSE		COMPONENT & EXPLANATION			PART OF SYSTEM		PIPE & SIZE		REPAIR DATA	
Corrosion		Pipe			Transmission		Steel		Number of Leaks	1
Outside Force		Valve			Main		Cast Iron		Bare	
Construction Defect		Fitting	✓		Service	✓	Ductile Iron		Coated	
Material Failure		Drip			Meter Set		Copper		Date Repaired:	2-18-15
Other	✓	Regulator			Customer Pipe		Plastic	✓	Date Rechecked:	3-17-15
		Top Connection			Other		Other		Positive ☐	Negative ☑
		Other								

RN PRINTERS & OFFICE SUPPLIES INC. 706-864-3618

2/12/2015
1:23:03 PM

CITY OF LAFAYETTE

13312

Gas Distribution

Conduct Leak Survey

W.O. #: 13312

Date Originated: 1/22/2015 Date Wanted: 1/22/2015 Assigned To: Received By: Glenn, Careomy

Service Location

Address: 42 CICERO ST City: LAFAYETTE State: GA Zip: 30728

Subdivision: Phase: Lot: Block:

Cross Street: Location Detail:

Between Intersection 1: And Intersection 2:

ACCOUNT NUMBER:	SYSTEM	Meter #:		ERT #	
First Name	Last Name	Home Phone	Work Phone	Mobile Phone	Customer Home?

Problem Description/Work Request

Leak Survey

CLOSED
Glenn 2/17/15

Leak Information

Leak Source	Leak Field Case #:	Date First Noticed	Time First Noticed	Leak Inside or Outside?	Is Noise of Gas Escaping Present?

Leak Cause	Date Cleared	Cleared By	Leak Location	Leak Grade

Job Site Information

Main Depth Main Location

Main Size: Material Type: Feet: Inches: Ft. From Curb Of:

Leak or Service is Test Pressure

Ft.	From Curb Of	Line PSI:	Lbs.:	Min.:	Residual Gas?

Pipeline Data

Facility Type:	Type of Pipe:	Condition of Pipe:	Type of Corrosion:	Max Pit Depth:	Type of Coating:	Int. Corr. Present?	System Type:

Service Insulated		Type of Riser		Cathodic Protection		
_ Main	_ Riser	Anodeless	Others:	C.P. Reading	Before	After
Anodes Number	Size	✓		Main		
		Odorant Level	Excess Flow Valve	Service	N.A.	
		Readily Detectable		Test Wire		

Main Construction **Service Construction**

	Size	Material	Length	Operating Pressure	Size	Material	Length	Operating Pressure
Retired								
Installed								

Meter Information

	Meter Nbr.	ERT Nbr.	Mfg. Name	Mfg. Nbr.	Meter Size	# of Dials	Meter Reading	Regulator Size
Existing Meter:	3009117	53458641			275	4	1443	043
New Meter:								

CITY OF LAFAYETTE

Conduct Leak Survey

13312

W.O. #: 13312

Planner Comment

Crew Information

Task Description (Work Activity):	Work Order Status	Start Date	Due Date	Complete Date
Perform Leak Survey	UNASSIGNED	1/22/2015	1/22/2015	1-22-15

Crew Comment:

Leak on coupling at standpipe
Replaced coupling

Job Cost (Labor/Material/Equipment)

Reg. Hrs	Ovt. Hrs	Dbl. Hrs	Delay Code	Delay Time	Part ID	Qty	Equipment ID	Hrs

D.R
Supervisor Signature

Date: 2-17-15

Superintendent

Ingram & ASSOCIATES, INC.

Corrosion Control and Safety Evaluations for Natural Gas Systems

P.O. Box 14 • Suches, Ga. 30572-0014 • Tel.: 706-747-2020 • Fax: 706-747-2024

Address 42 Cicero Hwy 136 E,

City/County La Fayette GA. State GA

District ZONE

Page No.

Field Case No.

Date 1-7-2015

GRADE OF CASE
SUMMARY

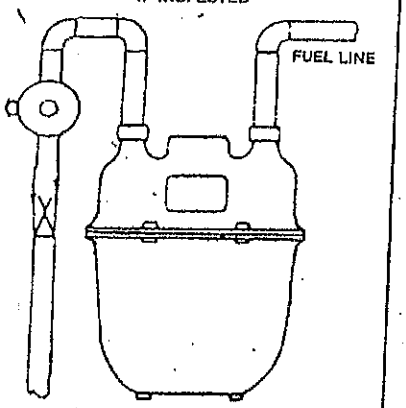
GRADE 1

GRADE (2)

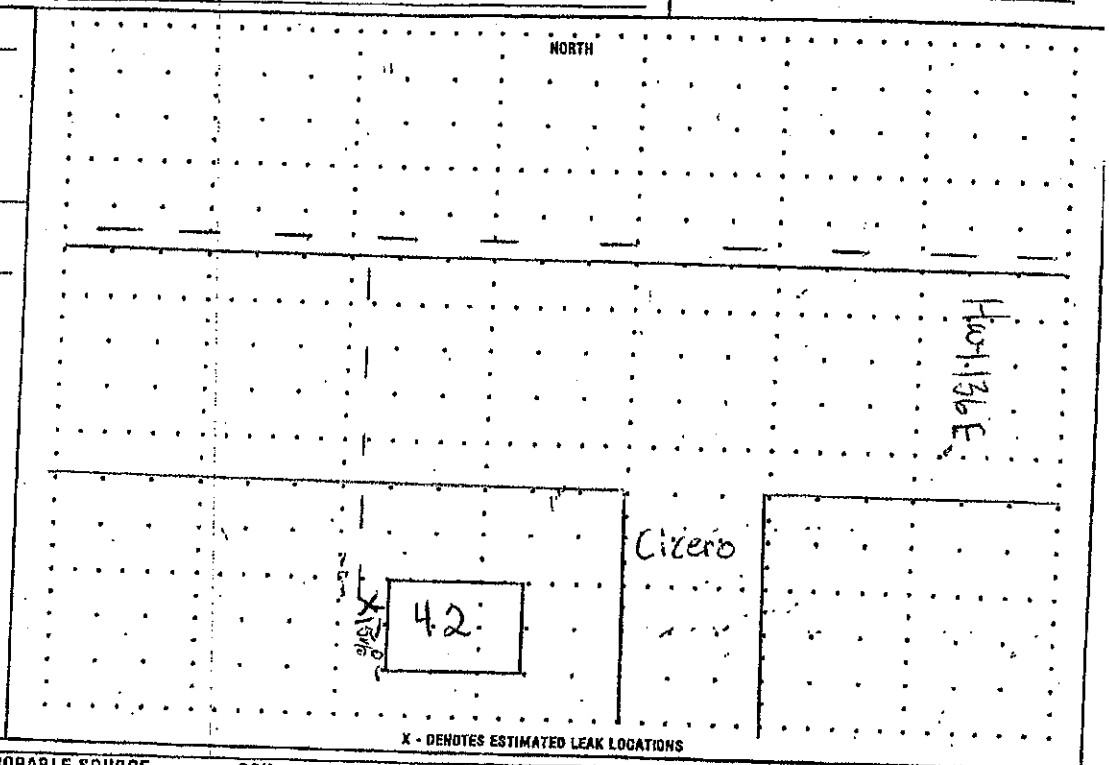
GRADE 3

METER SET

Meter No. IF INSPECTED



INSIDE ☐ OUTSIDE ☐



X - DENOTES ESTIMATED LEAK LOCATIONS

DETECTED BY		COLLECTING		PROBABLE SOURCE		SOIL		VENTED C.G.I. TEST		PRESSURE		SURFACE		PIPE & SIZE	
Mobile Flame Pack		In Building		Main		Rock		Gas %	15%	Low	✓	Lawn	✓	Steel	
Flame Pack	✓	Near Bldg.		Service	✓	Cinders		L.E.L. %		I.P.		Soil	✓	Plastic	✓
Visual/Vegetation	✓	In Man Hole		Service Tap		Clay	✓	P.P.M.		High		Paved		Cast Iron	
Combustible Meter	✓	In Soil		Valve		Loam		Negative		Transmission		Other		Other	
Odor		In Air	✓	Meter Set		Sand									
Other		Other		Other		Other									

REMARKS - VEGETATION DAMAGE

Leak appears to be ON Service @ or Near Riser & Service line Connect. Venting to atmosphere. No gas @ building wall @ this time.

AREA LOCATION: COMMERCIAL ☐ INDUSTRIAL ☐ RESIDENTIAL ☑ RURAL ☐

TECHNICIAN Jamie Stillwell GUIDE Tim Coker, Mike Leming

GAS COMPANY DATA

LEAK CAUSE		COMPONENT & EXPLANATION			PART OF SYSTEM		PIPE & SIZE		REPAIR DATA	
Corrosion		Pipe			Transmission		Steel		Number of Leaks	1
Outside Force		Valve			Main		Cast Iron		Bare	
Construction Defect		Fitting	✓		Service	✓	Ductile Iron		Coated	
Material Failure		Drip			Meter Set		Copper		Date Repaired:	1-22-15
Other	✓	Regulator			Customer Pipe		Plastic	✓	Date Rechecked:	2-12-15
		Top Connection			Other		Other		Positive ☐	Negative ☑
		Other								

ATTACHMENT H

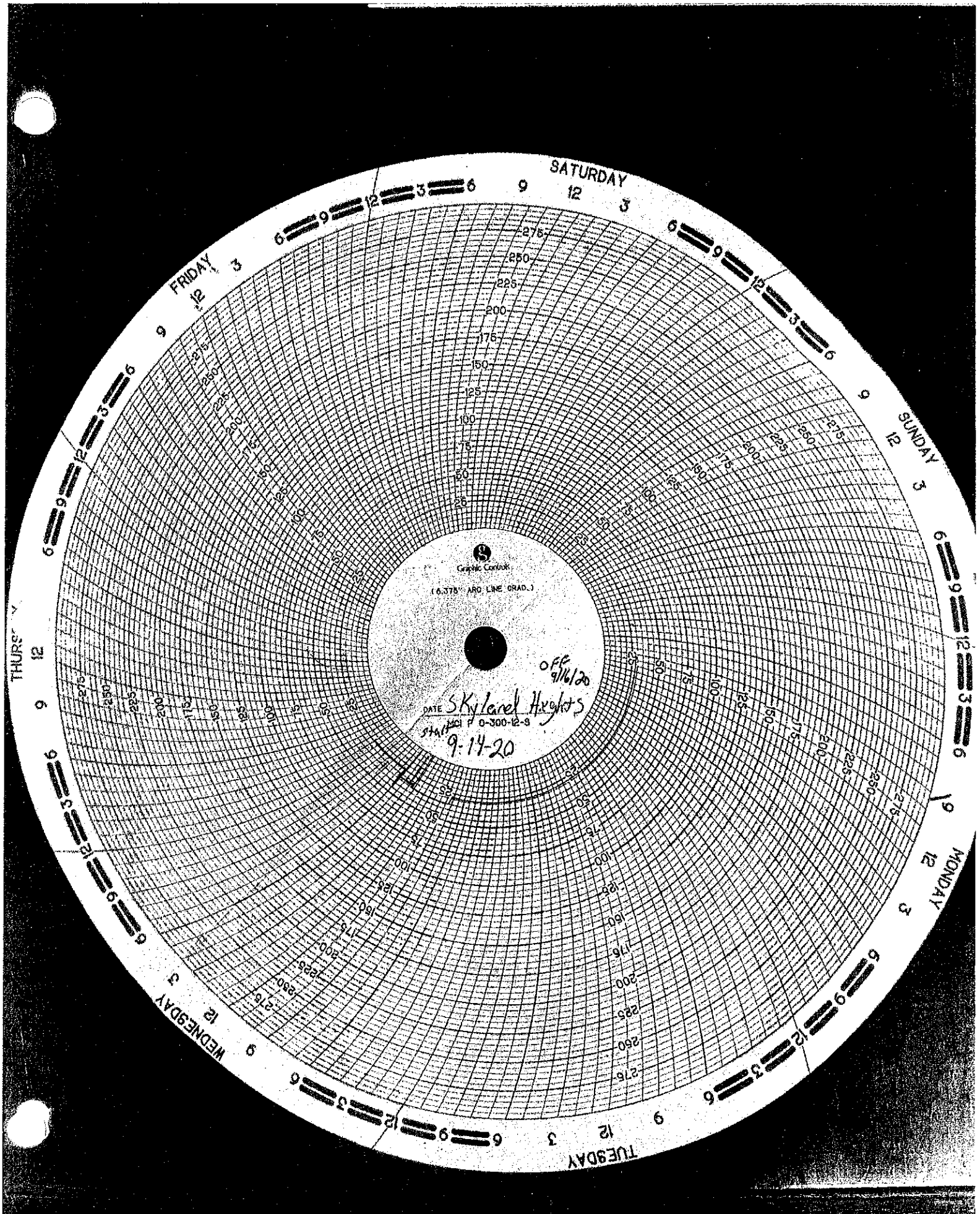
Material Records and Pressure Test Documentation

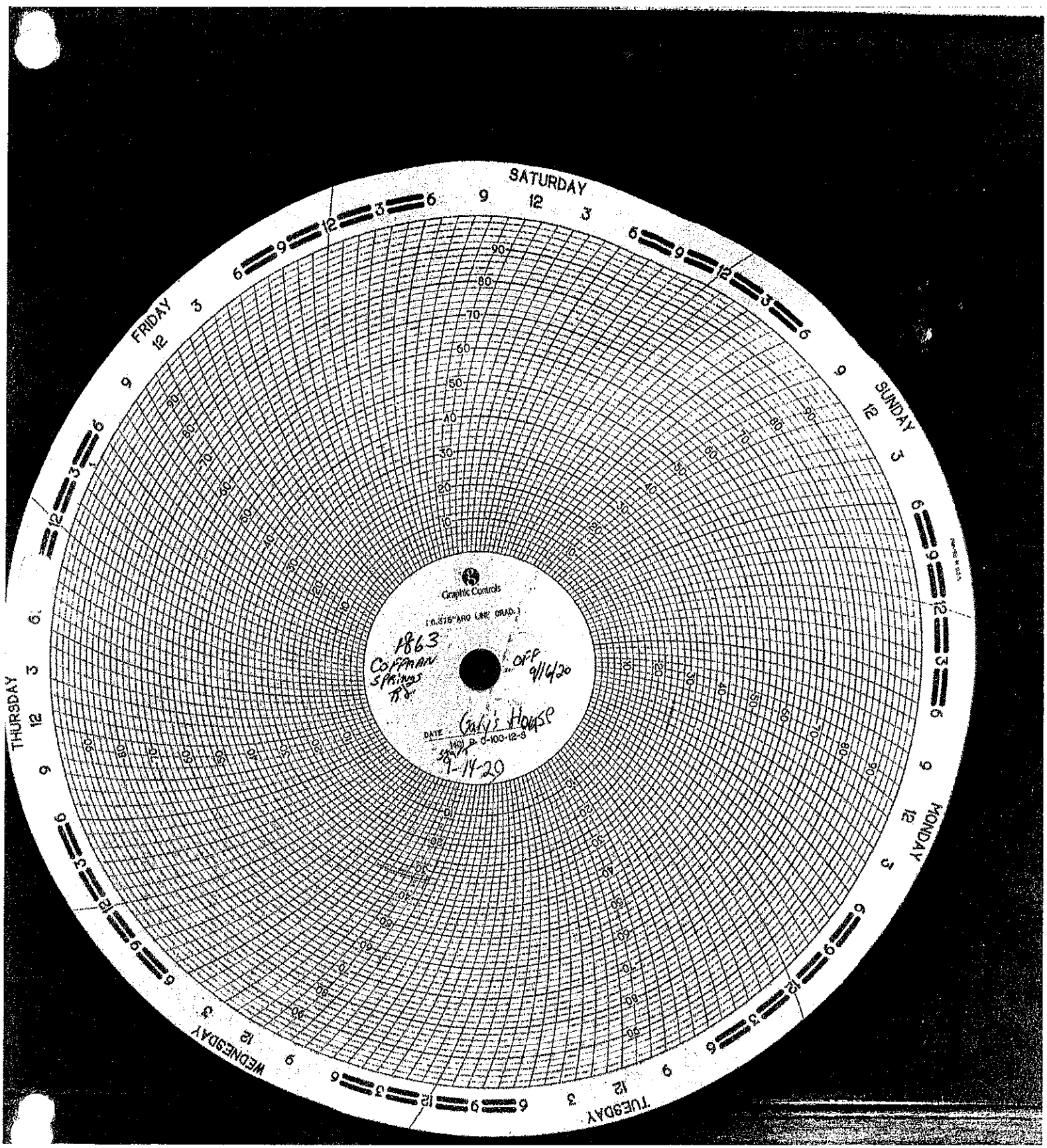
Supports material integrity and available test documentation.

Place Behind This Divider:

Uprating Plan Section 1.6; PE lateral pressure-test references

SUNDAY
MONDAY
TUESDAY
WEDNESDAY
THURSDAY
FRIDAY
SATURDAY
Graphic Controls
Naomi Church
9-14-20


SATURDAY
FRIDAY
SUNDAY
THURSDAY
MONDAY
WEDNESDAY
TUESDAY
Graphic Controls
(6.375" ARC LINE GRAD.)
DATE Skylarek Heights
STAR 9-14-20
OFF 9/16/20

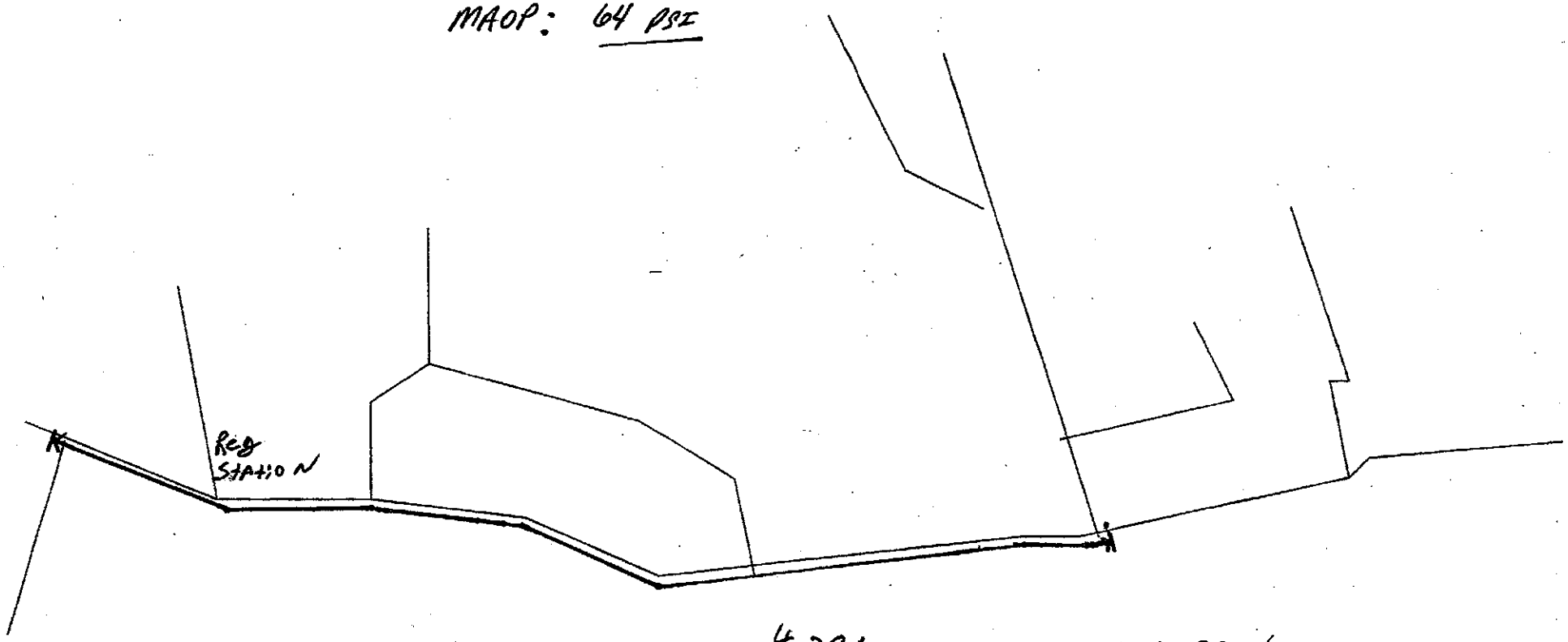

SATURDAY
SUNDAY
MONDAY
TUESDAY
WEDNESDAY
THURSDAY
FRIDAY
Graphic Controls
1863
Coffman
Springs
Rd.
off
9/16/20
Cary's House
9-14-20

SECTION _____

SIZE: 3½" OD

TESTED: 10-22-91 AT 96 PSI FOR 24 HOURS

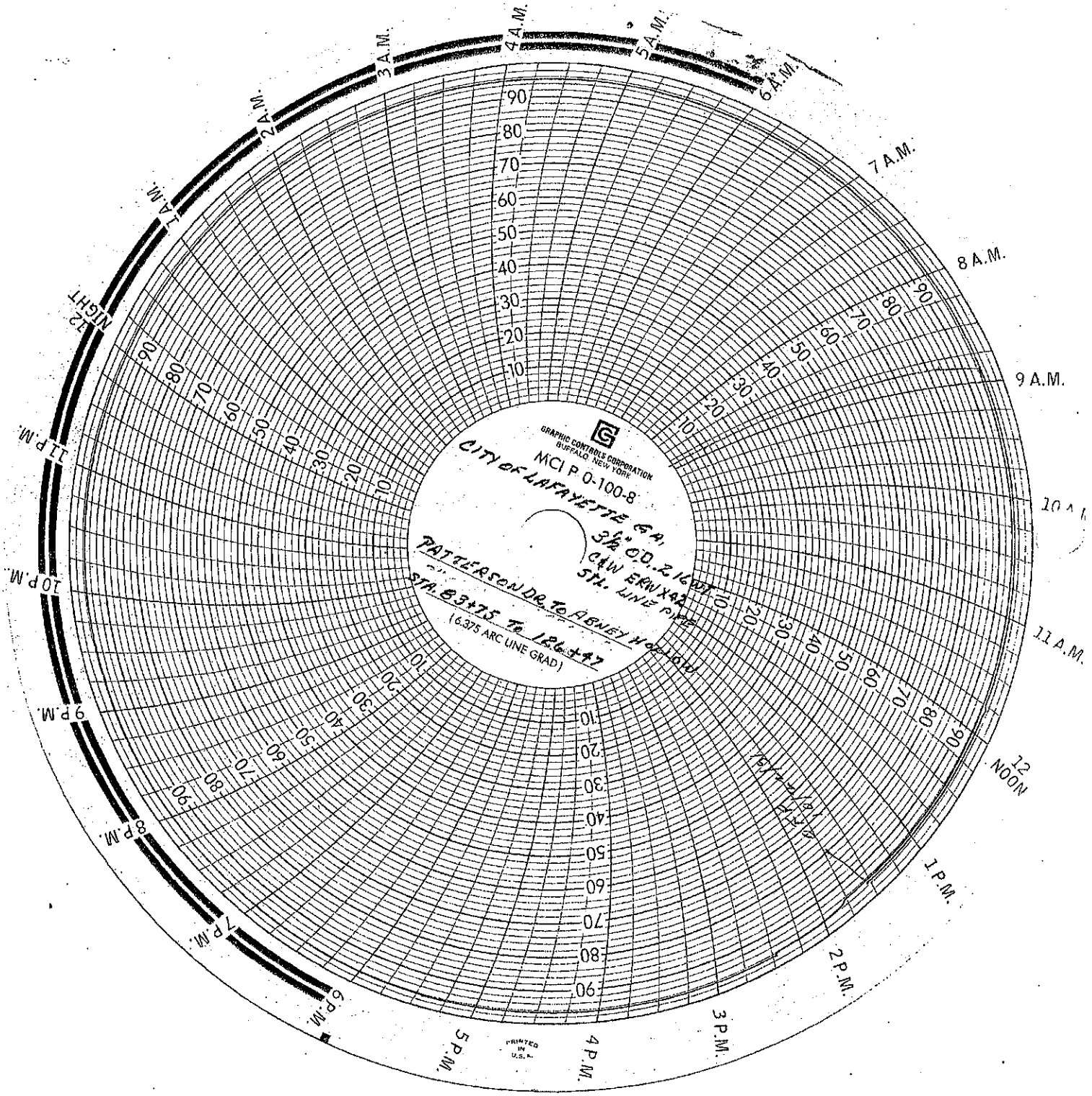
MAOP: 64 PSI



4,291 Ft. From Patterson

From Skyline Highs to Abney Hollow

Reg
Station 3,605

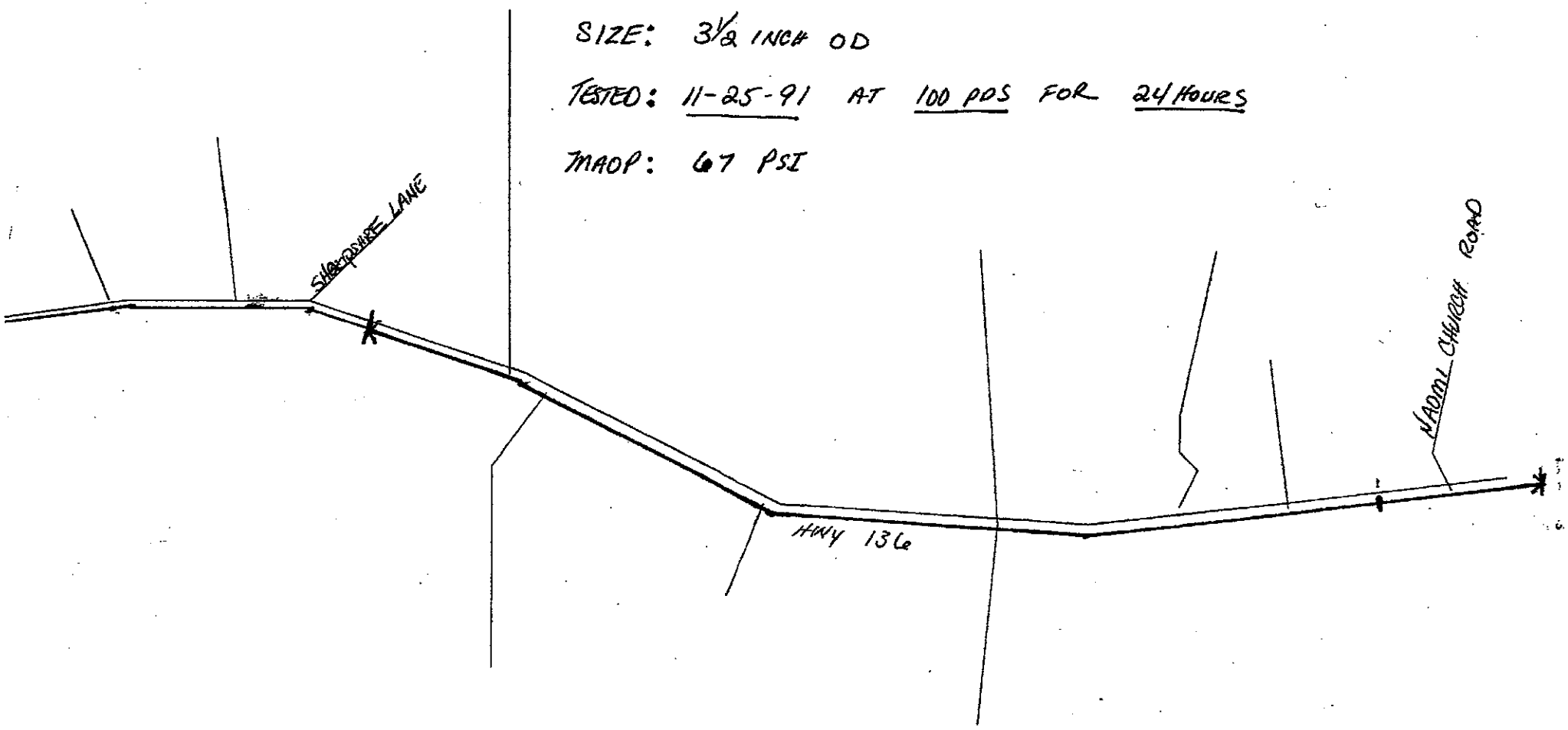

GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK
MCI P 0-100-8
CITY of LAFAYETTE GA.
3½" O.D. x 16 WT
C&W ERW X42
STL. LINE PIPE
PATTERSON DR. TO ABNEY HOSPITAL
STA. 83+75 TO 126+47
(6.375 ARC LINE GRAD.)
PRINTED IN U.S.A.
12 NOON
1 P.M.
2 P.M.
3 P.M.
4 P.M.
5 P.M.
6 P.M.
7 P.M.
8 P.M.
9 P.M.
10 P.M.
11 P.M.
12 NIGHT
1 A.M.
2 A.M.
3 A.M.
4 A.M.
5 A.M.
6 A.M.
7 A.M.
8 A.M.
9 A.M.
11 A.M.

SECTION _____

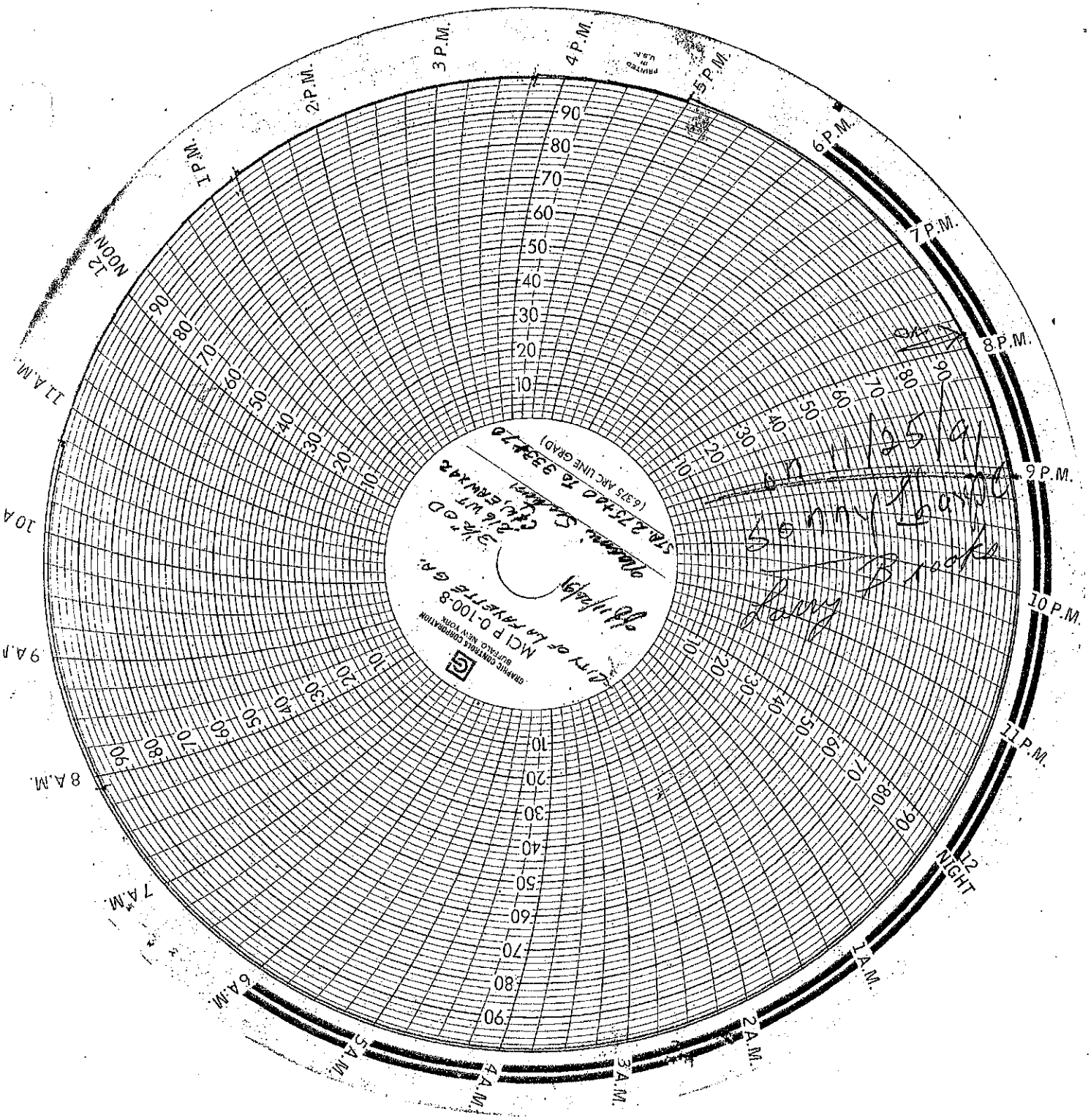
SIZE: 3½ INCH OD

TESTED: 11-25-91 AT 100 PDS FOR 24 HOURS

MAOP: 67 PSI



5,246 Ft

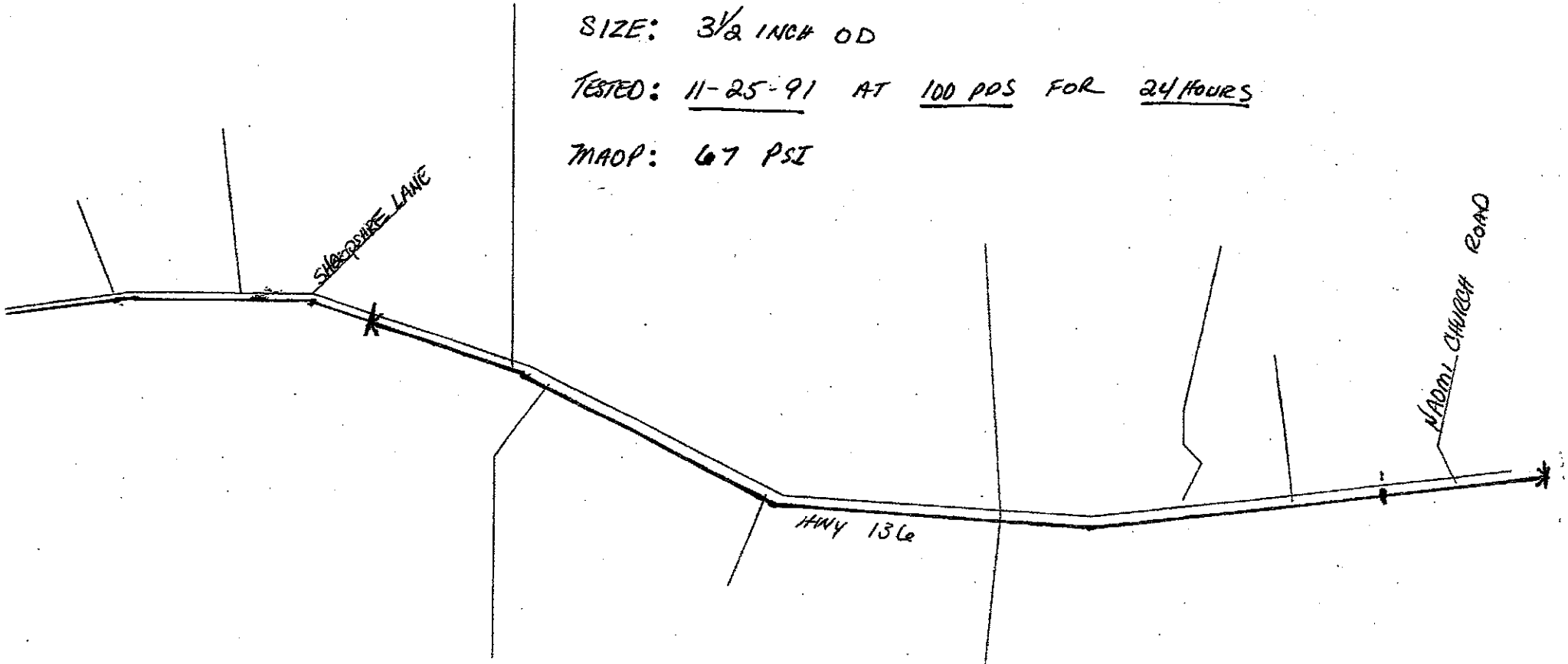

12 NOON
1 P.M.
2 P.M.
3 P.M.
4 P.M.
5 P.M.
6 P.M.
7 P.M.
8 P.M.
9 P.M.
10 P.M.
11 P.M.
12 NIGHT
1 A.M.
2 A.M.
3 A.M.
4 A.M.
5 A.M.
6 A.M.
7 A.M.
8 A.M.
9 A.M.
10 A.M.
11 A.M.
GRAPHIC CONTROLS CORPORATION
BUFFALO, NEW YORK
MCI P 0-100-8

SECTION _____

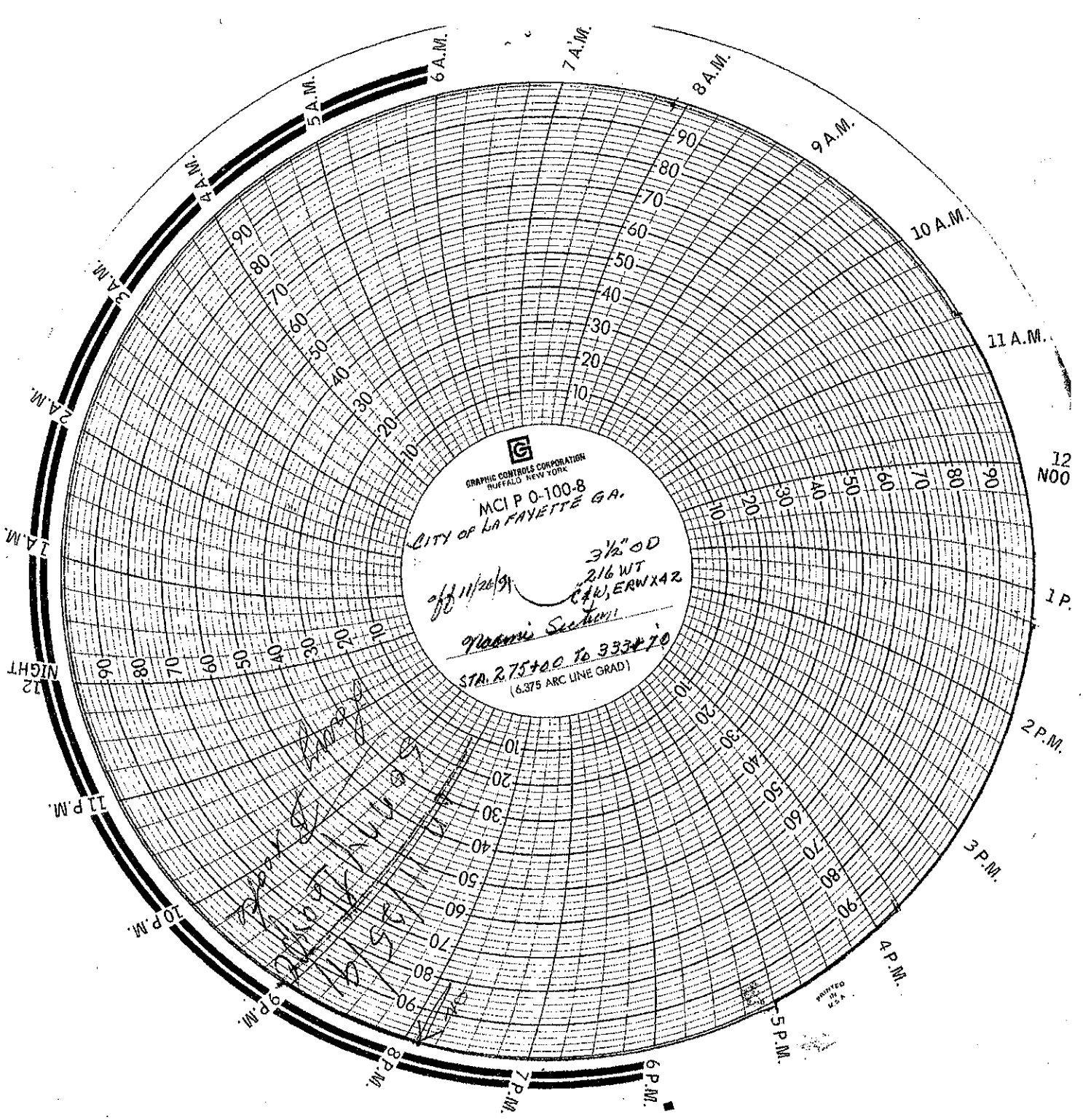
SIZE: 3½ INCH OD

TESTED: 11-25-91 AT 100 PSI FOR 24 HOURS

MAOP: 67 PSI



5,246 FT


GRAPHIC CONTROLS CORPORATION
BUFFALO NEW YORK
MCI P 0-100-8
CITY OF LA FAYETTE GA.
3½" OD
.216 WT
C&W, ERW X42
11/26/91
Naomi Section
STA. 275+00 To 333+70
(6.375 ARC LINE GRAD)
12 NOO
1 P.M.
2 P.M.
3 P.M.
4 P.M.
5 P.M.
6 P.M.
7 P.M.
8 P.M.
9 P.M.
10 P.M.
11 P.M.
12 NIGHT
1 A.M.
2 A.M.
3 A.M.
4 A.M.
5 A.M.
6 A.M.
7 A.M.
8 A.M.
9 A.M.
10 A.M.
11 A.M.
PRINTED IN U.S.A.

ATTACHMENT I

Customer / Load Information Supporting Need for Continued 33 psig Operation

Demonstrates peak poultry demand of 20,794 ccf in January 2026.

Place Behind This Divider:

LAFAYETTE POULTRY 2025-2026.xlsx summary pages

City of LaFayette Poultry Grower Gas Usage Dashboard

Analysis period: Sep-25 through Apr-26 | Source: original Summary tab CCF totals

Total CCF	68,179	Avg Monthly CCF	8,522	Peak Month	Jan-26	20,794 CCF	Low Month	Oct-25	2,230 CCF

Grower	Poultry Houses	Residence Meters	Poultry CCF	Residence CCF	Total CCF	Avg Monthly CCF	Avg Poultry CCF/House/Mo	Peak Month	Peak CCF	Low Month	Low CCF	Share of Total
Allen E Ridley	4	2	9,650	836	10,486	1,311	302	Feb-26	2,645	Sep-25	0,046	15.4%
Mack Morrison Jr.	6	2	35,722	866	36,588	4,574	744	Jan-26	14,202	Oct-25	0,381	53.7%
Jeremy Hamilton	6	2	20,123	982	21,105	2,638	419	Nov-25	6,105	Oct-25	0,079	31.0%
Combined	**0,016**	**0,006**	**65,495**	**2,684**	**68,179**	**8,522**		**Jan-26**	**20,794**	**Oct-25**	**2,230**	**100.0%**

Month	Allen E Ridley	Mack Morrison Jr.	Jeremy Hamilton	Combined Total
Sep-25	46	4,436	1,653	6,135
Oct-25	1,770	381	79	2,230
Nov-25	688	6,563	6,105	13,356
Dec-25	2,182	1,540	1,674	5,396
Jan-26	654	14,202	5,938	20,794
Feb-26	2,645	8,166	3,256	14,067
Mar-26	841	650	1,200	2,691
Apr-26	1,660	650	1,200	3,510

Key Analysis of the Three Growers

- Mack Morrison Jr. is the largest user at 36,588 CCF, representing 53.7% of total. His six poultry houses averaged 744 CCF per house per month.
- Jeremy Hamilton used 21,105 CCF, or 31.0% of total. January and November were high-use months; October was unusually low at 79 CCF.
- Allen E Ridley used 10,486 CCF, or 15.4% of total. His four poultry houses averaged 302 CCF per house per month, lower than the other growers.
- Combined usage peaked in Jan-26 at 20,794 CCF and was lowest in Oct-25 at 2,230 CCF.
- The layout now separates poultry-house usage from residence meters, uses chronological months, and adds KPI cards, normalized tables, and trend/comparison charts.

Recommended Follow-Up Checks

- Review September and October readings because multiple grower totals are unusually low compared with winter months.
- Exclude residence meters from per-house productivity metrics unless those meters serve poultry operations.
- Add bird counts, flock schedules, and house square footage to normalize usage more precisely.
- Use the Normalized Data tab as the clean source for future pivot tables and charts.
- Continue monitoring peak winter usage for capacity and revenue recovery planning.

ATTACHMENT J

Operating and Maintenance Commitments for Covered Facilities

Documents ongoing monitoring, inspection, and compliance commitments.

Place Behind This Divider:

Special Permit Sections 7, 10, and 11

Operating and Maintenance Commitments

Alternative Safety Measures

1. Continued operation under this request will be limited to the identified Skyline Heights facilities and will not exceed 33 psig. The Operator will not operate the covered facilities above 33 psig absent further engineering review and any additional regulatory authorization that may be required.
2. The Operator will perform and document leak surveys for the affected Skyline Heights special-permit facilities at least once every four years. This commitment applies as an added safety measure supporting continued operation at 33 psig for covered non-business-district facilities. Any leak indications identified on the covered facilities will be evaluated and repaired in accordance with the Operator's operating and maintenance procedures and applicable regulatory requirements.
3. The Operator will continue to inspect and document the regulator, monitor, and relief devices serving the Skyline Heights facilities at the Highway 136 / Skyline Heights regulator station at least annually.
4. The Operator will maintain a 30-day pressure-recording chart or equivalent logging device associated with the Skyline Heights special-permit facilities at the Skyline Heights regulator station and will retain those records as part of its permit-area documentation.
5. The Operator will retain leak survey records, pressure charts or equivalent pressure-logging records, repair records, engineering support documents, regulator and relief inspection records, and other special-permit compliance documentation for the life of the covered facilities remaining in service under this permit.
6. Qualified Operator personnel will continue to oversee operation, leak surveys, pressure monitoring, and documentation for the covered Skyline Heights facilities.
7. The Operator will continue to cooperate with PHMSA and the Georgia PSC regarding any further reporting, inspection, or permit conditions applicable to the continued operation of the covered Skyline Heights facilities.
8. The enhanced safety measures described in this application apply only to the affected Skyline Heights facilities remaining in service under the special permit

Leak Surveys and Monitoring

Leak surveys were conducted before and after each staged pressure increase during the 2020 uprating process. No leaks were found during the uprating process. Any future leak indications will be classified and repaired in accordance with the Operator's operating and maintenance plan and applicable requirements.

Following uprating, the Operator has continued regular leak survey activity and routine pressure monitoring through field observation and static gauge readings. Current pressure

monitoring for the affected line consists of static gauges at the regulator station and at the end of line on Highway 136.

As an added safety measure supporting this request, the Operator will maintain a 30-day pressure-recording chart or equivalent logging device at the Skyline Heights regulator station and retain those records as part of its permit-area documentation. Cathodic protection records, regulator and relief inspection records, pressure-test records, and related operating records are maintained and can be made available upon request.

Public Interest

Granting the requested special permit would be in the public interest because it would allow the Operator to continue providing adequate and reliable natural gas service to both existing residential customers and poultry-house loads in the Highway 136 East / Skyline Heights area without requiring unnecessary pressure reduction where safe continued operation has already been demonstrated through engineering review, completed staged uprating, leak surveys, and pressure monitoring.

The affected area includes approximately 163 residential customers and 16 poultry houses. The poultry-house loads provide meaningful service demand and operational need, and the record reflects that additional poultry-house load contributed to winter low-pressure problems before the uprating.

Granting the requested relief would preserve reliable service, support the local agricultural economy, and maintain the safety benefits of the Operator's completed uprating, monitoring, and leak-survey measures.

Responsibilities and Compliance Oversight

The Operator will maintain responsibility for operation, inspection, monitoring, and compliance for the Skyline Heights system. Overall oversight and compliance will be managed by, **Gas Foreman**, who will oversee implementation of the conditions associated with this request and continued regulatory compliance.

Operator personnel will perform leak surveys using approved procedures and equipment. The Gas Department will maintain all documentation related to the uprating and the special permit, and the Operator will communicate with PHMSA and the Georgia PSC regarding this application and any required follow-up.

Documentation and Recordkeeping

The Operator will retain all records related to the covered Skyline Heights facilities remaining in service under the special permit for the life of those covered facilities. These records will include, as applicable, leak survey records, pressure charts and monitoring data, 30-

day pressure-recording charts or equivalent logging records, work orders and repair records, engineering calculations, available material and test records, customer notification logs, regulator and relief inspection records, and special-permit correspondence and related submissions.

The Operator will maintain records identifying the facilities covered by the special permit, any covered facilities later replaced, abandoned, or otherwise removed from service, and any facilities removed from permit coverage because they have been replaced or otherwise requalified under an independent regulatory basis. These materials will be maintained in paper and electronic form and made available to PHMSA and the Georgia PSC upon request.

ATTACHMENT K

Regulatory Background and PSC Records

Provides regulatory context and corrective-action history.

Place Behind This Divider:

JS19-013 background; 2020 uprating records; related correspondence

COMMISSIONERS
LAUREN "BUBBA" McDONALD , CHAIRMAN
TIM G. ECHOLS
CHUCK EATON
TRICIA PRIDEMORE
JASON SHAW

DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

FILED
SEP 30 2019
EXECUTIVE SECRETARY
G.P.S.C.

Georgia Public Service Commission

(404) 463-6526
(800) 282-5813

244 Washington Street, SW
~~Atlanta, GA 30334-5701~~

FAX: (404) 463-6532
www.psc.state.ga.us

DOCKET # Docket No. 37061
DOCUMENT # 178510

City of LaFayette Utilities
PO Box 89
LaFayette, GA 30728

☐ Certified Mail ☐ Regular Mail

Attention: Mr. David Hamilton

On March 25, 2019, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JS19-013 is provided for your information and file.

In conjunction with this inspection report, Staff has recommended the following enforcement(s):

Enforcement Action:

- ☒ Notice of Probable Violation
- ☐ Notice of Probable Violation with Proposed Civil Penalty
- ☐ Notice of Amendment

Enforcement Letter:

- ☐ Warning Letter
- ☒ Letter of Concern

Enforcement Notification:

- ☐ Observed Issue
- ☐ No Violation

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. 37061 in your response.

Please let me know if there are any questions concerning this report at (404) 463-6526 or michellet@psc.state.ga.us. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle L. Thebert
Director, Office of Pipeline Safety/Facilities Protection

COMMISSIONERS
LAUREN "BUBBA" McDONALD , CHAIRMAN
TIM G. ECHOLS
CHUCK EATON
TRICIA PRIDEMORE
JASON SHAW

DEBORAH K. FLANNAGAN
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

(404) 463-6526
(800) 282-5813

244 Washington Street, SW
Atlanta, GA 30334-5701

FAX: (404) 463-6532
www.psc.state.ga.us

REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JS19-013

OPERATOR: City of LaFayette Utilities

INVESTIGATOR: Jason Smith

INSPECTION DATE: March 25, 2019 REPORT MAILED DATE: August 28, 2019

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 comprehensive inspection of the Operator's plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 4 9CFR Part(s) 191 and 192.

2. CONTINUING VIOLATIONS

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	JS19-013	3/25/2019
192.619(a)	No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum...	JS19-013	3/25/2019
192.553(a)(1)	At the end of each incremental increase, the pressure must be held constant while the entire...	JS19-013	3/25/2019
192.557(b)(1)	Before increasing operating pressure above the previously established maximum allowable operating...	JS19-013	3/25/2019
192.467(c)	Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically...	JS19-013	3/25/2019
192.553(b)	Records. Each operator who uprates a segment of pipeline shall retain for the life of the segment...	JS19-013	3/25/2019
192.553(d)	Limitation on increase in maximum allowable operating pressure. Except as provided in §192.555(c)...	JS19-013	3/25/2019

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF LAFAYETTE GAS DEPARTMENT / COMPREHENSIVE INSPECTION
INSPECTION NUMBER JS19-013 / DOCKET NUMBER 37061

On March 25 - 28, 2019, Pipeline Safety Staff of the Georgia Public Service Commission reported to the city of Lafayette Gas Department to perform a comprehensive inspection of the Operator's plans, programs and facilities.

During this inspection the Operator was represented by:
Duran Rowlls - Gas Department Foreman
Maurice Chaney - MGAG / SRCS Senior Compliance Analyst (Consultant)

Commission Staff was represented by:
Jason Smith - Lead Inspector
Alan Towe - Pipeline Safety Inspector
Jack Hewitt - Pipeline Safety Inspector

At the time of this inspection the City of Lafayette Gas Department had no previously existing probable violations.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that the City of LaFayette Gas Department was is probable violation of minimum federal safety standards; specifically:

1. §192.465(d) Each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.

   COMMENT: The City of LaFayette Gas Department's Operations & Maintenance manual states: 'the city of LaFayette will take prompt remedial action to correct any deficiencies indicated by the monitoring.'

   During this inspection (JS19-013) Staff found that the Villanow Bridge test station has been below criteria for 5 months. Staff also found that the Operator has approximately 12 bare steel services (installed after 1971) that do not meet their cathodic protection criteria level of -.850 mV.

   PROBABLE VIOLATION: The Operator failed to take prompt remedial action to address cathodic protection issues as required in Part 192.465(d).

2. §192.467(c) Except for unprotected copper inserted in ferrous pipe, each pipeline must be electrically isolated from metallic casings that are a part of the underground system. However, if isolation is not achieved because it is impractical, other measures must be taken to minimize corrosion of the pipeline inside the casing.

   COMMENT: During this inspection (JS19-013) Staff performed a field inspection of the Operator's cathodic protection system and found that they have not achieved electrical isolation from their casings.

PROBABLE VIOLATION: The City of LaFayette Gas Department failed to achieve electrical isolation from metallic casings.

3. 192.553(a)(1) - Pressure increases. Whenever the requirements of this subpart require that an increase in operating pressure be made in increments, the pressure must be increased gradually, at a rate that can be controlled, and in accordance with the following: At the end of each incremental increase, the pressure must be held constant while the entire segment of the pipeline that is affected is checked for leaks.

   STAFF COMMENTS: The Operator performed an uprating to the Skyline Heights system. The Operators uprating plan called for two (2) incremental pressure increases. The Operator provided records which demonstrated that a leak survey was conducted on this system on November 10/11, 2011; however they could not demonstrate that a leak survey had been conducted prior to the first incremental pressure increase as required by their uprating plan. The plan called for this leak survey to occur during June 2014.

   The Operator also provided records which indicated that there was a leak survey conducted following the first incremental pressure increase from 19PSI to 27 PSI on September 30 to October 1, 2014. The Operator also provided records which they claim indicates that a leak survey was conducted after the 2nd incremental pressure increase; however, the record does not indicate the dates of the survey, or state the pressure the line was increased to.

   The Operator could not provide any records which demonstrated that the pressure on this pipeline was held constant while the entire segment of the pipeline that was checked for leaks, as required by their uprating plan.

   PROBABLE VIOLATION: The Operator failed to perform the uprating of the Skyline Heights in accordance with the requirements of 192.553(a)(1) and their uprating plan.

4. §192.553(b) Records. Each operator who uprates a segment of pipeline shall retain for the life of the segment a record of each investigation required by this subpart, of all work performed, and of each pressure test conducted, in connection with the uprating.

   COMMENT: The City of LaFayette Gas Department preformed an uprate of the Skyline Heights system from 19 to 35psi. During this uprating process the Operator failed to maintain for the life of the segment a record of each investigation required by this subpart, of all work performed, and of each pressure test conducted, in connection with the uprating. Specifically, the Operator failed to maintain documentation which demonstrated a leak survey was conducted prior to the start of the pressure increase; documentation which demonstrated that a leak survey was conducted following the 2nd pressure increase; and documentation which demonstrated that the pressure was held constant while the entire segment of the pipeline that was checked for leaks, as required by their uprating plan.

Staff also noted that the Operator uprating plan states, in section 4, that: "Records of the investigations, the work, and the testing associated with this Uprating Procedure will be maintained for the life of the facility."

PROBABLE VIOLATION: The City of Lafayette failed to maintain records which demonstrate that the uprating of the Skyline Heights system was conducted in accordance with SubPart K, and their uprating procedure.

5. 192.553(d) - Limitation on increase in maximum allowable operating pressure. Except as provided in §192.555(c), a new maximum allowable operating pressure established under this subpart may not exceed the maximum that would be allowed under §§ 192.619 and 192.621 for a new segment of pipeline constructed of the same materials in the same location. However, when uprating a steel pipeline, if any variable necessary to determine the design pressure under the design formula (§192.105) is unknown, the MAOP may be increased as provided in §192.619(a)(1).

   STAFF COMMENTS: The Operator's uprating plan fails to demonstrate how the MAOP of the Skyline Heights system was established prior to performing this uprating. The Operator's uprating plan states that the: "Proposed MAOP is less than the 200 psig maximum allowed by §192.619(a)(1)(ii)"; however, the plan fails to demonstrate that the proposed 200psig pressure is the lowest pressure calculated under §192,619(a) and §192.621(a).

   Staff also notes that under §192.621(a) the Operator must consider the design pressure of the weakest element in the segment, determined in accordance with Part 192, SubPart's C and D; and they must consider the history of the segment, particularly known corrosion and the actual operating pressures. Staff found that the Operator's uprating plan states that during their review of the requirements for §192.619 and §192.621, they found that "most variables are unknown"; including original construction dates, wall thicknesses, and grade of materials.

   PROBABLE VIOLATION: The City of Lafayette failed to substantiate the maximum allowable operation pressure of the Skyline Heights system prior to performing an uprate.

6. §192.557(b)(1) Before increasing operating pressure above the previously established maximum allowable operating pressure, the operator shall: Review the design, operating, and maintenance history of the segment of pipeline;

   COMMENT: In 2014 the city of LaFayette Gas Department performed an Uprate of the Skyline Heights system from 19 to 35psi. Staff reviewed the Operators uprating plan and procedure, and found that it failed to demonstrate that the Operator had performed a thorough review of the pressure ratings of the pipeline system components, such as valves, fittings, pipe, and regulators, prior to performing this pressure increase. Staff found that the Operator's uprating plan states that during their review of the requirements for §192.619 and §192.621, they found that "most variables are unknown"; including original construction dates, wall thicknesses, and grade of materials.

PROBABLE VIOLATION: The Operator's uprating plan and procedure failed to identify all the pipeline components and pressure rating for affected facilities.

7. §192.619(a) No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum allowable operating pressure determined under paragraph (c) or (d) of this section, or the lowest of the following:

   STAFFS COMMENTS: In 2014 the city of LaFayette Gas Department performed an Uprate of the Skyline Heights system from 19 to 35psi. Staff reviewed the Operators uprating plan and procedure, and found that it failed to demonstrate that the Operator had performed a thorough review of the pressure ratings of the pipeline system components, such as valves, fittings, pipe, and regulators, prior to performing this pressure increase. Staff found that the Operator's uprating plan states that during their review of the requirements for §192.619 and §192.621, they found that "most variables are unknown"; including original construction dates, wall thicknesses, and grade of materials.

   PROBABLE VIOLATION: The City of Lafayette is operating their Skyline Heights system at a pressure above its demonstrated maximum allowable operating pressure.

   In their response to this inspection, the Operator must demonstrate how they established the MAOP of this pipeline prior to performing the pressure test. They must then demonstrate that this pipeline can be uprated in accordance with the requirements of §192.553 and §192.557 from that previously established MAOP. If the Operator cannot demonstrate that this line can be uprated in accordance with the requirements in SubPart K, they must provide a plan for returning this line to its previous operating pressure as soon as possible.

ITEM OF CONCERN

§192.747(b) - Each operator must take prompt remedial action to correct any valve found inoperable, unless the operator designates an alternative valve.

COMMENT: During this inspection (JS19-013) Staff found two (2) critical valves that could not be operated by a single employee, and were barely operable by two (2) employees. Staff recommends that these valves be repaired or replaced as soon as possible.

STAFF'S CONCERN: In the event of an after-hours emergency, the gas department employee on call would not be able to operate these valves without the assistance of another person.

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.

Information for Natural Gas Operators Regarding Enforcement Actions, Enforcement Letters, & Notifications Issued by the GPSC's Pipeline Safety Director

Commission Rules 515-9-3-.09 and .10 provide the options available to respond when an Enforcement Letter is issued by the Facilities Protection Unit Director/Pipeline Safety Director (Director) of the Georgia Public Service Commission ("Commission"). The following information provides natural gas operators with general information, the process for responding to said Enforcement Letters, and procedures for requesting a hearing.

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.

I. General Information Regarding Enforcement Actions, Enforcement Letters, and Notifications Issued by the Commission

A. Enforcement Actions:

1. Notice of Probable Violation (NOPV)-The purpose of this enforcement action is to document and to provide notice concerning any probable violations of a rule or regulation. A NOPV may or may not contain a proposed civil penalty.
2. Notice of Amendment (NOA)-The purpose of this enforcement action is to document and to provide notice concerning a required plan amendment for an Operator.

Enforcement Actions require a written response from the Operator detailing how the issue will be addressed or corrected, and the proposed timeframe(s) for said corrections. See *Process for Responding to Enforcement Actions* below for additional details.

B. Enforcement Letters:

1. Warning Letter-The purpose of this letter is to document and to provide notice concerning any probable violations of a rule or regulation.
2. Letter of Concern- The purpose of this letter is to document concerns with an Operator's plans, programs, or facilities, which could result in a probable violation unless action is taken to address the issue.

Enforcement Letters require a written response within thirty (30) days acknowledging receipt of the letter(s). Enforcement Letters serve as notice to the Operator that if appropriate action is not taken to correct the probable violation(s), enforcement actions may be taken if a subsequent inspection reveals continuing or new violation(s). The Operator is not required to provide corrective action or file a written plan of action; however, it is in the best interest of the Operator to provide notice as to whether any corrective action will be taken. Failure to provide this information may result in formal interrogatories from the Director through data requests.

C. Notifications:

1. Observed Issue: The purpose of this notification is to inform the Operator of identified or observed conditions or operating practices that may or may not be in violation at the time. However, if the issue is not corrected, it may result in a future violation or an unsafe situation.

2. No Violation: The purpose of this notification is to inform the Operator that no violations were noted during the inspection. This notification will be sent to the Operator by electronic mail. Please note that it is the Operator's responsibility to ensure that the GPSC has the correct e-mail address for the required recipient of Commission correspondence.

Notifications require an electronic response to the Director @ michellet@psc.state.ga.us within five (5) days acknowledging receipt of the notification.

II. Process for Responding to Enforcement Actions

Unless otherwise noted, the Operator has thirty (30) days from the date the Enforcement Action is received by the Operator filed to file a written response with the Executive Secretary or request an informal conference with the Director. Any Operator who chooses to request an informal conference shall request such a conference through either emailing or calling the Director at michellet@psc.state.ga.us / 404-463-2765.

A. Notice of Probable Violation (NOPV)

The Operator may request an informal conference with the Director and/or her Staff to discuss the NOPV. The violation may be resolved at this stage; however, if agreement cannot be reached, enforcement procedures shall continue. If you chose not to seek an informal conference, the following due process options are available:

1. The Operator may submit a written statement to the Director indicating that corrective measures have achieved compliance; or
2. The Operator may submit a written plan of action to the Director outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated.

If the corrective measures that the Operator presents or proposes are acceptable to the Director, the violation may be cleared at this point. Such acceptance shall be verified by written statement issued by the Director following a re-inspection of the operator's facilities.

If the proposed solution as outlined is not satisfactory to the Director, the violation shall be referred to the Commission for formal resolution in either of the following manners:

1. The Commission may seek an injunction or mandamus in superior court in cases where immediate action is necessary; or
2. The Commission may issue a show cause order and/or schedule a hearing requiring the operator to demonstrate why the operator should not be subject to the penalties set forth by O.C.G.A. §46-2-91.

B. Notice of Probable Violation with a Proposed Civil Penalty

The Operator may request an informal conference with the Director and/or her Staff to discuss the NOPV and proposed civil penalty. The violation and/or proposed civil penalty may be resolved at this stage; however, if agreement cannot be reached, enforcement procedures shall continue. If you chose not to seek an informal conference, the following due process options are available:

1. If you are not contesting the violation alleged or the proposed civil penalty, submit a written response notifying the Director of your desire to settle this matter by paying the recommended proposed civil penalty. Upon such notification, you will be provided with a Consent Agreement that shall be fully executed by the Operator, and submitted along with a

certified check for the full amount of the recommended civil penalty and made payable to the Georgia Public Service Commission. You must ensure that the Operator's name and the applicable Docket No. and Inspection Report No. are included in the "memo" line of the certified check. The certified check shall be mailed to:

Ms. Michelle Thebert, Director
Facilities Protection Unit
Georgia Public Service Commission
244 Washington Street
Atlanta, Georgia 30334

2. If you are not contesting the violation alleged, but are contesting the proposed civil penalty, and wish to submit written explanations, information, or other materials you believe warrant mitigation of the civil penalty, you may submit such materials. The Director will review the materials and provide the operator with a draft Consent Agreement that will represent the Staff's initial settlement offer. You must either sign the draft Consent Agreement or submit a counter-offer back to the Staff within thirty (30) days. Please refer to Commission Rule 515-9-3-.011, for the factors that the Commission considers regarding the assessment of civil penalties.

   If an agreement cannot be reached, the alleged violation and proposed civil penalty shall be referred to the Commission for formal resolution in either of the following manners:
   1. The Commission may seek an injunction or mandamus in superior court in cases where immediate action is necessary; or
   2. The Commission may issue a show cause order and/or schedule a hearing requiring the operator to demonstrate why the operator should not be subject to the penalties set forth by O.C.G.A. §46-2-91.

3. If you are contesting both the alleged violation and the proposed civil penalty, you may request a hearing before the Commission. Please see *Procedures for Requesting a Hearing* below.

C. Notice of Amendment (NOA)

The Operator may request an informal conference with the Director and/or her Staff to discuss the NOA. If you chose not to seek an informal conference, the following due process options are available:

1. If you are not contesting the NOA, you must submit to the Director the measures taken or of your plan(s) to address the observed deficiencies identified in the NOA. If the corrective measures that you present, or propose, are acceptable to the Director, the violation may be cleared this point. Such acceptance shall be verified by written statement issued by the Director following a re-inspection of the operator's facilities;
2. If you are not contesting the NOA, but you wish to submit written explanations, information, or other materials believed to warrant modification of the NOA in whole or in part, or if you are seeking clarification of the terms of the NOA, you may submit such materials; or
3. If you wish to contest the NOA, you must submit written explanations, information, or other materials in answer to the allegations in the NOA stating your reasons for objecting to the NOA, in whole or in part. If the information provided is acceptable to the Director, the issue may be closed at this point. Such acceptance shall be verified by written

statement issued by the Director. If the information provided is not acceptable to the Director, then the Operator will be given the option of an Informal Conference with the Director or the case will be referred to the Commission for a formal resolution on the contested issue.

D. Continuing and/or Existing Violations

Continuing and/or existing violations that were not cleared as a result of the current inspection must be addressed in the response letter. The Operator shall provide the current status, updates, expected completion dates, proposed modifications, etc., of the continuing and/or existing violations in each response letter, even if this information was provided in a previously filed response letter. Failure to provide this information may result in formal interrogatories from the Director through data requests. **Please Note**: Referencing a previously filed response letter does not meet the intent of this provision.

III. Procedures for Requesting a Hearing

The Operator has the right to request a hearing 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. Your request must also indicate whether or not you will be represented by counsel at the hearing.

You are 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:	)	
	)	
Probable Violation Report	)	**DOCKET NO. 37061**
Letter of Concern	)	
City of LaFayette Utilities	)	
Inspection JS19-013 on March 25, 2019	)	

CERTIFICATE OF SERVICE

I hereby certify that the *Probable Violation Report; Letter of Concern, City of LaFayette Utilities, Inspection JS19-013 on March 25, 2019* was filed with the Commission's Executive Secretary in the above-styled Docket, and a copy of same was served upon all parties and persons listed below via electronic mail as indicated by an asterisk. I further certify that the *City of LaFayette* was served a hard copy of the above-stated document by U.S. Mail, certified/return receipt requested.

*Reece McAlister, Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, GA 30334

*David Hamilton, City Manager
City of LaFayette Utilities
P.O. Box 89
LaFayette, GA 30728
dhamilton@cityoflafayettega.org

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

Respectfully Submitted this 9th day of October 2019:

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

OPERATOR RESPONSE FORM

Informal Conference Requested: Yes ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

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

Response to Inspection Number: **EA25-041**

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: Dana Ponder Foreman

   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: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.467 (c) ☐ 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 LaFayette has cleared the shorted casing at Foster Mill Road and has advanced corrective actions for the remaining identified casing locations. The casing at Warren Road will be abandoned, while the casing at Park Street will be replaced through the installation of new steel natural gas mains via horizontal directional drilling. The existing carrier pipe and casing at these locations will be abandoned by grout fill.

These activities are covered under GDOT Utility Permit No. U-295-012865-6-RR. Engineering design for the remaining locations has been completed and is currently progressing through the permitting process.

The City is in the final stages of permitting and will proceed with construction upon receipt of all required approvals.

Response Provided by: Donna Rowe Foreman Date: 4/22/06

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 d ☐ 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 LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review

Response Provided by: Duran Rowe Foreman Date: 4/22/26

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 b ☐ 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 LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Duran Rawls Foreman Date: 4/22/06

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.619a ☐ 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 LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Dean Powell, Foreman Date: 4/27/06

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.557 b 1 ☐ 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 LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Duron Rowder Foreman Date: 4/27/06

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.605 (a) ☐ 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 LaFayette provides the following update regarding this item. The City has reviewed and updated its procedures for the placement of distribution line valves in accordance with 49 CFR § 192.181(a). These updates define the criteria for valve placement and ensure that valve locations support effective emergency shutdown and pressure reduction.

Response Provided by: Duran Ponder Foreman Date: 4/22/06

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 (a) 1 ☐ 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 LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Duron Powell Foreman Date: 4/22/26

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

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

Response to Inspection Number: **JB26-002**

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: Duron Reuse Foreman
   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: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 d ☐ 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	Proposed Penalty for this violation
☐ Warning Letter	☐ Yes ☐ No	
☐ Letter of Concern	☐ Yes ☐ No	
☐ Observed Issue	☐ Yes ☐ No	
☐ Proposed Civil Penalty	☐ Yes ☐ No	

OPERATORS RESPONSE:

The City of LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review

Response Provided by: Duran Rowden Foreman Date: 4/22/06

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 b ☐ 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 LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Susan Rowell Foreman Date: 4/27/26

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.619a ☐ 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 LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Duran Rowell Date: 4/22/06

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.557 b 1 ☐ 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 LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Dawn Rowden Date: 4/27/66

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.605 (a) ☐ 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 LaFayette provides the following update regarding this item. The City has reviewed and updated its procedures for the placement of distribution line valves in accordance with 49 CFR § 192.181(a). These updates define the criteria for valve placement and ensure that valve locations support effective emergency shutdown and pressure reduction.

Response Provided by: Duran Rawls Foreman Date: 4/27/06

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 ☐ No X

Operator Name: City of LaFayette Docket Number: 37061

Enforcement Action for: §192.553 (a) 1 ☐ 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 LaFayette acknowledges the outstanding probable violations associated with the uprating of the Skyline Heights system under Inspection Number JS19-013, as most recently evaluated under Follow-up Inspection Number EA25-041. In accordance with the direction provided by Commission Staff during the informal conference, the City intends to pursue a request for waiver/special permit relief for the applicable requirements under 49 CFR Subpart K, in accordance with 49 CFR § 190.341(c). This response serves as the City's 45-day notice to the FPU Director of its intent to pursue that waiver request. The City will submit the formal special permit/waiver request to the FPU Director within the 60-day period identified in this report, and that request will be filed under Docket Number 37061 for forwarding to PHMSA for review.

Response Provided by: Dawn Rowda Foreman Date: 4/27/06

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: _____

COMMISSIONERS

JASON SHAW, Chairman
LAUREN "BUBBA" McDONALD, Vice-Chairman
PETER HUBBARD
DR. ALICIA M. JOHNSON
TRICIA PRIDEMORE

FILED
MAR 12 2026
EXECUTIVE SECRETARY
GPSC

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

(404) 463-6526
(800) 282-5813

244 Washington Street, SW
Atlanta, GA 30334-5701

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

Docket No. 37061

DOCKET# 37061
DOCUMENT# 225784

City of LaFayette Utilities
PO Box 89
LaFayette, GA 30728

ATTN: David Hamilton

On September 15, 2025 a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an informal conference as requested by the gas operator. The enclosed inspection report numbered EA25-041 is provided for your information and file.

Please submit a written response outlining the proposed mitigation measures to this inspection as specified in the attached report by U.S. Mail or e-mailing me at michellet@psc.state.ga.us. Please refer to Docket No. 37061 in your response.

Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle Thebert

Michelle Thebert
Director, Office of Pipeline/Facilities Safety

COMMISSIONERS

JASON SHAW , Chairman
LAUREN "BUBBA" McDONALD , Vice-Chairman
PETER HUBBARD
DR. ALICIA M. JOHNSON
TRICIA PRIDEMORE

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

Georgia Public Service Commission

(404) 463-6526
(800) 282-5813

244 Washington Street, SW
Atlanta, GA 30334-5701

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

REPORT OF NATURAL GAS SAFETY

INSPECTION NO: EA25-041

OPERATOR: City of LaFayette Utilities

INVESTIGATOR: Eric Atkins

INSPECTION DATE: September 15, 2025 REPORT MAILED DATE: March 12, 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
192.619(a)	No person may operate a segment of steel or plastic pipeline at a pressure that exceeds a maximum...	JS19-013	3/25/2019
192.553(a)(1)	At the end of each incremental increase, the pressure must be held constant while the entire...	JS19-013	3/25/2019
192.557(b)(1)	Before increasing operating pressure above the previously established maximum allowable operating...	JS19-013	3/25/2019
192.467(c)	Except for unprotected copper inserted in a ferrous pipe, each pipeline must be electrically...	JS19-013	3/25/2019
192.553(b)	Records. Each operator who uprates a segment of pipeline shall retain for the life of the segment...	JS19-013	3/25/2019
192.553(d)	Limitation on increase in maximum allowable operating pressure. Except as provided in §192.555(c)...	JS19-013	3/25/2019
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	AT22-016	5/9/2022

3. CLEARED VIOLATIONS

Cleared on 9/15/2025

Violation	Description	Inspection#	Date
192.465(d)	Each operator shall take prompt remedial action to correct any deficiencies indicated by the...	JS19-013	3/25/2019
199.241	Training for supervisors.	AT19-039	10/17/2019
199.105(c)(6)	The operator shall randomly select a sufficient number of covered employees for testing during...	AT19-039	10/17/2019
199.113(c)	Supervisory Personnel Training (Drug)	AT19-039	10/17/2019

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF LAFAYETTE UTILITY DEPARTMENT / FOLLOW-UP INSPECTION
INSPECTION NUMBER EA25-041 / DOCKET NUMBER 37061

On September 15, 2025, Pipeline Safety Staff reported to the City of LaFayette Utility Department to perform a follow-up inspection of the Gas Department's previously existing probable violations.

During this inspection, the Operator was represented by:
Duran Rowlls - Gas Department Foreman
Maurice Chaney - MGAG/SRCS (Consultant)

Commission Staff was represented by:
Eric Atkins - Lead Inspector
Daphne Jones - Pipeline Safety Inspector

At the time of this inspection the City of LaFayette Utility Department was under ten previously existing probable violations. Staff reviewed these violations with the Operator and determined that:

PROBABLE VIOLATION CLEARED

1. In regard to the probable violation of 49CFR §192.465(d) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

   "The City of LaFayette Gas Department's Operations & Maintenance manual states: 'the city of LaFayette will take prompt remedial action to correct any deficiencies indicated by the monitoring.'

   During this inspection (JS19-013) Staff found that the Villanow Bridge test station has been below criteria for 5 months. Staff also found that the Operator has approximately 12 bare steel services (installed after 1971) that do not meet their cathodic protection criteria level of -.850 mV.

   PROBABLE VIOLATION: The Operator failed to take prompt remedial action to address cathodic protection issues as required in Part 192.465(d)."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

   "The cathodic protection at the Villanow Bridge test station is currently at an acceptable level. LaFayette's records indicate that there were at one time twelve bare, unprotected services. Five of these services have been replaced or inserted. Cathodic protection has been installed on the remaining seven and LaFayette will replace or insert these services by January 31, 2020."

   FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

   "At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

"LaFayette has not been able to replace or insert the remaining seven bare, unprotected services due to company restrictions associated with COVID-19. LaFayette will replace or insert these services as soon as possible and will advise Staff when the schedule can be confirmed."

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

"LaFayette has not been able to replace or insert the remaining seven bare, unprotected services due to company restrictions associated with COVID-19. LaFayette will replace or insert these services as soon as possible and will advise Staff when the schedule can be confirmed."

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"The cathodic protection at the Villanow Bridge test station is currently at an acceptable level. LaFayette's records indicate that there were at one time twelve bare, unprotected services. Five of these services have been replaced or inserted. Cathodic protection has been installed on the remaining seven. Restrictions associated with COVID-19 have delayed LaFayette's addressing the remaining services. LaFayette will replace or insert these services by August 31, 2020."

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) the Operator informed Staff that due to the constant wet weather they had not been able to replace or insert the remaining seven bare, unprotected services. Once weather conditions improve the work will be scheduled."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette has not been able to replace or insert the remaining seven bare, unprotected services due to company restrictions associated with COVID-19. LaFayette will replace or insert these services as soon as possible and will advise Staff when the schedule can be confirmed."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette has eliminated all bare steel services from its system."

SIXTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette has eliminated all bare steel services from its system."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041), Staff reviewed the (7) work orders (23035, 25590, 25679, 23037, 24697, 25590 and 20853) from CY2019 through CY2021 submitted by the City of LaFayette Gas Department and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

2. In regard to the probable violation of 49CFR §199.105(c)(6) which was cited in Inspection Number AT19-039; in that inspection Staff stated:

"During this inspection Staff reviewed Operator records that indicated they had only performed 4 random test in calendar year 2018 and had a total of 12 covered employees.

PROBABLE VIOLATION: Operator failed to perform their random drug testing at a minimum of 50 percent for calendar year 2018 that was established by the Administrator."

Staff proposed a civil penalty of $5,000.00 for this violation.

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039 that was filed with the Public Service Commission on September 24, 2020, the Operator stated:

"Lafayette has requested an Informal Conference with the Director to discuss the NOPV and proposed civil penalty. Lafayette also provides the following response to the Probable Violation associated with the Proposed Civil Penalty:

LaFayette has contracted with a different provider for its random drug testing and believes this change will ensure the appropriate percentage of Covered Employees are randomly tested."

FIRST FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"LaFayette has not received the Report on Inspection AT19-039 and will respond upon receipt."

SECOND FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) Staff asked the Operator if they were able to provide any status to this issue that was brought up during the AT19-039 Drug & Alcohol inspection. The Operator informed Staff that they were using a service provided by Lab Corp that did the computer-based random selection process for LaFayette Gas Department covered employees. After the Drug & Alcohol inspection they decided to change from Lab Corp. to C.H.I. Memorial. The Operator believes this change in service agent will help ensure the appropriate percentage of covered employees will be randomly tested."

Because the Operator has requested an informal conference with the Director in regard to the proposed civil penalty for this item this violation was not cleared.

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette has contracted with C.H.I. Memorial as stated."

THIRD FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated

"LaFayette has contracted with a different provider for its random drug testing to ensure the appropriate percentage of Covered Employees are randomly tested."

FOURTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette has contracted with a different provider for its random drug testing to ensure the appropriate percentage of Covered Employees are randomly tested."

FIFTH FOLLOW-UP INSPECTION: During this inspection (EA25-041), Staff reviewed the documentation for CY2021, 2022, 2023 and 2024 of random drug testing submitted by the City of LaFayette Gas Department and found that it adequately addresses this violation. Staff also found that the Operator settled the proposed civil penalty for this violation when they entered into a Consent Agreement with the Commission on January 10, 2022.

Staff determined that this violation could be cleared at this time.

3. In regard to the probable violation of 49CFR §199.113(c) which was cited in Inspection Number AT19-039; in that inspection Staff stated:

"During this inspection Staff found no training record for the Supervisor of the Gas Superintendent who is a covered employee in the Operators Anti-Drug Plan.

PROBABLE VIOLATION: Operator failed to provide supervisory personnel who will determine whether an employee must be drug tested based on reasonable cause, 60-

minute period of training on the specific, contemporaneous physical, behavioral, and performance indicators of probable drug use."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039 that was filed with the Public Service Commission on September 24, 2020, the Operator stated:

"LaFayette does not contest the violation alleged or request an informal conference to discuss this NOPV and files the following written statement indicating that corrective measures have achieved compliance:

Lafayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FIRST FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"LaFayette has not received the Report on Inspection AT19-039 and will respond upon receipt."

SECOND FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) Staff asked the Operator if they were able to provide any status to this issue that was brought up during the AT19-039 Drug & Alcohol inspection. The Operator informed Pipeline Safety Staff that they are in the process of having a person who is not in the random drug testing pool, take the 60-minute training on specific, contemporaneous physical, behavioral and performance indicators of probable drug use."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"The City Manager has taken the 60/60 training as stated."

THIRD FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated

"LaFayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FOURTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FIFTH FOLLOW-UP INSPECTION: During this inspection (EA25-041), Staff reviewed the copies of the 60-minute training certificate for the City Manager and Supervisor submitted by the City of LaFayette Gas Department and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

4. In regard to the probable violation of 49CFR §199.241 which was cited in Inspection Number AT19-039; in that inspection Staff stated:

"COMMENTS: During this inspection Staff found no training record for the supervisor of the Gas Superintendent who is a covered employee in the Operators Anti-Alcohol Plan.

PROBABLE VIOLATION: Operator failed to provide 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039 that was filed with the Public Service Commission on September 24, 2020, the Operator stated:

"LaFayette does not contest the violation alleged or request an informal conference to discuss this NOPV and files the following written plan of action outlining the corrective measures that will be taken to achieve compliance and when compliance is anticipated:

Lafayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FIRST FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"LaFayette has not received the Report on Inspection AT19-039 and will respond upon receipt."

SECOND FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) Staff asked the Operator if they were able to provide any status to this issue that was brought up during the AT19-039 Drug & Alcohol inspection. The Operator informed Pipeline Safety Staff that they are in the process of having a person who is not in the alcohol testing pool take the 60-minute training on the physical, behavioral, speech and performance indicators of probable alcohol misuse."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"The City Manager has taken the 60/60 training as stated."

THIRD FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated

"LaFayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FOURTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette's City Manager, who is the immediate supervisor of the gas superintendent and who is not a Covered Employee, has completed the required training."

FIFTH FOLLOW-UP INSPECTION: During this inspection (EA25-041), Staff reviewed the copies of the 60-minute training certificate for the City Manager and Supervisor submitted by the City of LaFayette Gas Department and found that it adequately addresses this violation.

Staff determined that this violation could be cleared at this time.

PROBABLE VIOLATIONS CONTINUING

1. In regard to the probable violation 49CFR §192.467(c) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

   "During this inspection (JS19-013) Staff performed a field inspection of the Operator's cathodic protection system and found that they have not achieved electrical isolation from their casings.

   PROBABLE VIOLATION: The City of LaFayette Gas Department failed to achieve electrical isolation from metallic casings."

   FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

   "LaFayette will excavate to the ends of the Warren Road, Park Street, and Foster Mill Road casings and examine the carrier pipe by December 20, 2019, and then develop a plan for achieving electrical isolation by January 2020."

   FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

   "At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

   SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

"LaFayette has contracted with a consulting engineer to obtain permits and quotes to clear the shorted casings and will advise Staff of the projected completion date when it is known."

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

"LaFayette has contracted with a consulting engineer to obtain permits and quotes to clear the shorted casings and will advise Staff of the projected completion date when it is known."

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"LaFayette has excavated the ends of the Warren Road, Park Street, and Foster Mill Road casings and examined the carrier pipe. A plan will be developed for achieving electrical isolation by September 1, 2020."

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) the Operator informed Staff that they did attempt digging up these casing locations but were unsuccessful in separating the pipe from the casing. They are in the process of getting quotes to have a contractor do this work for them."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette has contracted with a consulting engineer to obtain permits and quotes to clear the shorted casings and will advise Staff of the projected completion date when it is known."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette will address one of its three shorted casings by 05-31-23. LaFayette has applied for railroad permits needed to address the remaining two shorted casings and expects this work to be completed by 12-31-23."

SIXTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette will address one of its three shorted casings by 05-31-23. LaFayette has applied for railroad permits needed to address the remaining two shorted casings and expects this work to be completed by 12-31-23."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041), Staff reviewed the work order submitted by the City of LaFayette Gas Department for the completed Foster Mill Rd. replacement and the plans for the (2) remaining casings. The Operator is still trying to obtain permits from D.O.T. to complete replacements.

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

2. In regard to the probable violation of 49CFR §192.553(a)(1) which was cited in Inspection Report Number JS19-013; in that inspection Staff stated:

"The Operator performed an uprating to the Skyline Heights system. The Operators uprating plan called for two (2) incremental pressure increases. The Operator provided records which demonstrated that a leak survey was conducted on this system on November 10/11, 2011; however they could not demonstrate that a leak survey had been conducted prior to the first incremental pressure increase as required by their uprating plan. The plan called for this leak survey to occur during June 2014.

The Operator also provided records which indicated that there was a leak survey conducted following the first incremental pressure increase from 19PSI to 27 PSI on September 30 to October 1, 2014. The Operator also provided records which they claim indicates that a leak survey was conducted after the 2nd incremental pressure increase; however, the record does not indicate the dates of the survey, or state the pressure the line was increased to.

The Operator could not provide any records which demonstrated that the pressure on this pipeline was held constant while the entire segment of the pipeline that was checked for leaks, as required by their uprating plan.

PROBABLE VIOLATION: The Operator failed to perform the uprating of the Skyline Heights in accordance with the requirements of 192.553(a)(1) and their uprating plan."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

"LaFayette will address this issue as follows:

- *Review the design, operating, and maintenance history of the Skyline Heights system by February 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review by February 2020, and then revise as necessary*
- *Install pressure regulators feeding the Skyline Heights system by February 2020*
- *Perform the uprating within 120 days of completion of Staff review of the plan"*

FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their

written inspection report and was in process of reviewing for response to this office within 30 days."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

Restrictions associated with COVID-19 have delayed LaFayette's addressing this issue. A revised schedule describing how LaFayette will address this issue follows:

- *Review of the design, operating, and maintenance history of the Skyline Heights system is complete*
- *Install pressure regulators feeding the Skyline Heights system: Completed June 19, 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review: Completed July 6, 2020*
- *If no objection to the proposed uprating plan is received from GPSC Staff within 15 days of submittal of the plan for review, LaFayette will proceed with uprating.*
- *Perform the uprating within 120 days of commencement, subject to any restrictions in place related to with COVID-19.*

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) the Operator informed Staff that they are presently working with Sapp Engineering to address the problems that stem from the uprating of the Skyline Heights system."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SIXTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

SEVENTH OPERATOR RESPONSE; In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041) Staff determined that the Operator has still not demonstrated that this uprating was conducted in compliance with the requirements of 49CFR, Part 192, SubPart K. Staff is referring this item to the Facilities Protection Unit Supervisor and/or Director for resolution.

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

3. In regard to the probable violation of 49CFR §192.553(b) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

"The City of LaFayette Gas Department preformed an uprate of the Skyline Heights system from 19 to 35psi. During this uprating process the Operator failed to maintain for the life of the segment a record of each investigation required by this subpart, of all work performed, and of each pressure test conducted, in connection with the uprating. Specifically, the Operator failed to maintain documentation which demonstrated a leak

survey was conducted prior to the start of the pressure increase; documentation which demonstrated that a leak survey was conducted following the 2nd pressure increase; and documentation which demonstrated that the pressure was held constant while the entire segment of the pipeline that was checked for leaks, as required by their uprating plan.

Staff also noted that the Operator uprating plan states, in section 4, that: "Records of the investigations, the work, and the testing associated with this Uprating Procedure will be maintained for the life of the facility."

PROBABLE VIOLATION: The City of Lafayette failed to maintain records which demonstrate that the uprating of the Skyline Heights system was conducted in accordance with SubPart K, and their uprating procedure."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

"LaFayette will address this issue as follows:

- *Review the design, operating, and maintenance history of the Skyline Heights system by February 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review by February 2020, and then revise as necessary*
- *Install pressure regulators feeding the Skyline Heights system by February 2020*
- *Perform the uprating within 120 days of completion of Staff review of the plan"*

FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

Restrictions associated with COVID-19 have delayed LaFayette's addressing this issue. A revised schedule describing how LaFayette will address this issue follows:

- *Review of the design, operating, and maintenance history of the Skyline Heights system is complete*
- *Install pressure regulators feeding the Skyline Heights system: Completed June 19, 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review: Completed July 6, 2020*
- *If no objection to the proposed uprating plan is received from GPSC Staff within 15 days of submittal of the plan for review, LaFayette will proceed with uprating.*
- *Perform the uprating within 120 days of commencement, subject to any restrictions in place related to with COVID-19.*

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) the Operator informed Staff that they are presently working with Sapp Engineering to address the problems that stem from the uprating of the Skyline Heights system."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of

Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SIXTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041) Staff determined that the Operator has still not demonstrated that this uprating was conducted in compliance with the requirements of 49CFR, Part 192, SubPart K. Staff is referring this item to the Facilities Protection Unit Supervisor and/or Director for resolution.

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

4. In regard to the probable violation of 49CFR §192.553(d) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

"The Operator's uprating plan fails to demonstrate how the MAOP of the Skyline Heights system was established prior to performing this uprating. The Operator's uprating plan states that the: "Proposed MAOP is less than the 200 psig maximum allowed by §192.619(a)(1)(ii)"; however, the plan fails to demonstrate that the proposed 200psig pressure is the lowest pressure calculated under §192,619(a) and §192.621(a).

Staff also notes that under §192.621(a) the Operator must consider the design pressure of the weakest element in the segment, determined in accordance with Part 192, SubPart's

C and D; and they must consider the history of the segment, particularly known corrosion and the actual operating pressures. Staff found that the Operator's uprating plan states that during their review of the requirements for §192.619 and §192.621, they found that "most variables are unknown"; including original construction dates, wall thicknesses, and grade of materials.

PROBABLE VIOLATION: The City of Lafayette failed to substantiate the maximum allowable operation pressure of the Skyline Heights system prior to performing an uprate."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

"LaFayette has documented the MAOP of the Skyline Heights system prior to performing the uprating."

FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

"LaFayette has documented the MAOP of the Skyline Heights system prior to performing the uprating."

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) the Operator informed Staff that they are presently working with Sapp Engineering to address the problems that stem from the uprating of the Skyline Heights system."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SIXTH FOLLOW-UP INSPECTION: From May 9 to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline,

construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041) Staff determined that the Operator has still not demonstrated that this uprating was conducted in compliance with the requirements of 49CFR, Part 192, SubPart K. Staff is referring this item to the Facilities Protection Unit Supervisor and/or Director for resolution.

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

5. In regard to the probable violation of 49CFR §192.557(b)(1) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

In 2014 the city of LaFayette Gas Department performed an Uprate of the Skyline Heights system from 19 to 35psi. Staff reviewed the Operators uprating plan and procedure, and found that it failed to demonstrate that the Operator had performed a thorough review of the pressure ratings of the pipeline system components, such as valves, fittings, pipe, and regulators, prior to performing this pressure increase. Staff found that the Operator's uprating plan states that during their review of the requirements for §192.619 and §192.621, they found that "most variables are unknown"; including original construction dates, wall thicknesses, and grade of materials.

PROBABLE VIOLATION: The Operator's uprating plan and procedure failed to identify all the pipeline components and pressure rating for affected facilities.

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated that:

"LaFayette will address this issue as follows:

- *Review the design, operating, and maintenance history of the Skyline Heights system by February 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review by February 2020, and then revise as necessary*
- *Install pressure regulators feeding the Skyline Heights system by February 2020*
- *Perform the uprating within 120 days of completion of Staff review of the plan"*

FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

Restrictions associated with COVID-19 have delayed LaFayette's addressing this issue. A revised schedule describing how LaFayette will address this issue follows:

- *Review of the design, operating, and maintenance history of the Skyline Heights system is complete*

- *Install pressure regulators feeding the Skyline Heights system: Completed June 19, 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review: Completed July 6, 2020*
- *If no objection to the proposed uprating plan is received from GPSC Staff within 15 days of submittal of the plan for review, LaFayette will proceed with uprating.*
- *Perform the uprating within 120 days of commencement, subject to any restrictions in place related to with COVID-19.*

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

"During this inspection (JS20-011) the Operator informed Staff that they are presently working with Sapp Engineering to address the problems that stem from the uprating of the Skyline Heights system."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SIXTH FOLLOW-UP INSPECTION: From May 9, to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041) Staff determined that the Operator has still not demonstrated that this uprating was conducted in compliance with the requirements of 49CFR, Part 192, SubPart K. Staff is referring this item to the Facilities Protection Unit Supervisor and/or Director for resolution.

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

6. In regard to the probable violation of 49CFR §192.619(a) which was cited in Inspection Number JS19-013; in that inspection Staff stated:

"In 2014 the city of LaFayette Gas Department performed an Uprate of the Skyline Heights system from 19 to 35psi. Staff reviewed the Operators uprating plan and procedure, and found that it failed to demonstrate that the Operator had performed a thorough review of the pressure ratings of the pipeline system components, such as valves, fittings, pipe, and regulators, prior to performing this pressure increase. Staff found that the Operator's uprating plan states that during their review of the requirements for §192.619 and §192.621, they found that "most variables are unknown"; including original construction dates, wall thicknesses, and grade of materials.

PROBABLE VIOLATION: The City of Lafayette is operating their Skyline Heights system at a pressure above its demonstrated maximum allowable operating pressure.

In their response to this inspection, the Operator must demonstrate how they established the MAOP of this pipeline prior to performing the pressure test. They must then demonstrate that this pipeline can be uprated in accordance with the requirements of §192.553 and §192.557 from that previously established MAOP. If the Operator cannot demonstrate that this line can be uprated in accordance with the requirements in SubPart K, they must provide a plan for returning this line to its previous operating pressure as soon as possible."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number JS19-013, dated November 8, 2019, the Operator stated:

"LaFayette will address this issue as follows:

- *Review the design, operating, and maintenance history of the Skyline Heights system by February 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review by February 2020, and then revise as necessary*
- *Install pressure regulators feeding the Skyline Heights system by February 2020*
- *Perform the uprating within 120 days of completion of Staff review of the plan"*

FIRST FOLLOW-UP INSPECTION: On September 15, 2019, Commission Staff reported to the City of Lafayette to conduct an Operator Qualification inspection and Protocol 9 field inspections for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-038) In that inspection Staff stated:

> *"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."*

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number AT19-038, received October 8, 2020, the Operator stated:

> *"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."*

SECOND FOLLOW-UP INSPECTION: On September 17, 2019, Commission Staff reported to the City of Lafayette to conduct a Part 199 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number AT19-039) In that inspection Staff stated:

> *"At the time of this inspection, City of Lafayette had seven existing probable violations. Staff did not perform follow up inspection because Operator had just received their written inspection report and was in process of reviewing for response to this office within 30 days."*

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number AT19-039, received October 8, 2020, the Operator stated:

> *"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."*

THIRD FOLLOW-UP INSPECTION: On March 10 and 11, 2020, Staff reported to the City of LaFayette to perform a Distribution Integrity Management Program Implementation inspection on the Gas Department. (Ref. Inspection Number JS20-012) In that inspection Staff stated:

> *"At the time of this inspection the City of LaFayette Utilities had 10 previously existing probable violations. These violations are addressed under inspection number JS20-011."*

FOURTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-012, which was received on August 3, 2020, the Operator stated:

> *Restrictions associated with COVID-19 have delayed LaFayette's addressing this issue. A revised schedule describing how LaFayette will address this issue follows:*
>
> - *Review of the design, operating, and maintenance history of the Skyline Heights system is complete*

- *Install pressure regulators feeding the Skyline Heights system: Completed June 19, 2020*
- *Develop a new uprating plan and provide said plan to GPSC Staff for review: Completed July 6, 2020*
- *If no objection to the proposed uprating plan is received from GPSC Staff within 15 days of submittal of the plan for review, LaFayette will proceed with uprating.*
- *Perform the uprating within 120 days of commencement, subject to any restrictions in place related to with COVID-19.*

FOURTH FOLLOW-UP INSPECTION: On March 10 & 11, 2020 Pipeline Safety Staff reported to the City of LaFayette to perform a follow-up inspection of the Gas Department's previously existing probable violations. (Ref. Inspection Number JS20-011) In that inspection Staff stated:

> *"During this inspection (JS20-011) the Operator informed Staff that they are presently working with Sapp Engineering to address the problems that stem from the uprating of the Skyline Heights system."*

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number JS20-011, which was received on September 22, 2020, the Operator stated:

> "LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase is scheduled for September 29, 2020."

FIFTH FOLLOW-UP INSPECTION: On August 10, 2022, Staff reported to the City of LaFayette Gas Department to perform an inspection of the Operator's methane emission reduction plan for compliance with the Congressional mandate of Section 114 of the Protecting Our Infrastructure of Pipelines and Enhancing Safety (PIPES) Act of 2020. (Ref. Inspection Number DJ22-042) In that inspection Staff stated:

> *"At the time of this inspection the City of LaFayette was under eleven (11) previously existing probable violations. Staff did not review these violations during this inspection."*

SIXTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ22-042; dated December 20, 2022, the Operator stated:

> *"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."*

SIXTH FOLLOW-UP INSPECTION: From May 9, to October 13, 2022 Staff reported to Walker County to perform a construction inspection of the Operator's new four-inch polyethylene pipeline, construction records, joining procedures and qualification records. (Ref. Inspection Number AT22-016) In that inspection Staff stated:

> *"At the time of this inspection the City of Lafayette had eleven previously existing probable violations. Since Staff specifically reviewed new construction in Walker County a review of the existing violations was not performed."*

SEVENTH OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"LaFayette submitted their uprating plan to GPSC on 7-6-20. After 15 days of submission the City of Lafayette began uprating this portion of their system from 20 psi to 28 psi this increase was completed on 8-01-2020. The final increase and final leakage survey were completed on 09-16-20."

SEVENTH FOLLOW-UP INSPECTION: During this inspection (EA25-041) Staff determined that the Operator has still not demonstrated that this uprating was conducted in compliance with the requirements of 49CFR, Part 192, SubPart K. Staff is referring this item to the Facilities Protection Unit Supervisor and/or Director for resolution.

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

7. In regard to the probable violation 49CFR §192.605(a) which was cited in Inspection Number AT22-016; in that inspection Staff stated:

"Based on the observed deficiency indicated in this report, Staff determined that the Operator has failed to prepare and follow a manual of written procedures for conducting operations and maintenance activities and for emergency response.

OBSERVED DEFICIENCY: 49 CFR, §192.181 - Distribution line valves
(a) Each high-pressure distribution system must have valves spaced so as to reduce the time to shut down a section of main in an emergency. The valve spacing is determined by the operating pressure, the size of the mains, and the local physical conditions.

COMMENTS: The PHMSA Form 26 (Design and Construction of a Gas Distribution Facility), which Staff is required to complete, tasks Staff with determining if distribution line valves are being installed as required of §192.181. During this inspection Staff attempted to determine if the Operator was installing valves spaced so as to reduce the time to shut down a section of main in an emergency. However, the Operator was not able to provide Staff with a process for how the actual spacing and placement of these valves was established which would demonstrate that they have complied with their OPM procedure for valve spacing.

REQUIRED AMENDMENT: The City of Lafayette must amend their procedures to address the placement of distribution line valves for their system."

OPERATOR RESPONSE: In their response letter to Inspection Number AT22-016, dated December 20, 2022, the Operator stated:

"The City of LaFayette will implement a Construction Manual that includes provisions for the placement of valves in newly constructed distribution mains by June 23, 2023."

FIRST FOLLOW-UP INSPECTION: Due to the number of outstanding violations to be reviewed during this inspection (EA25-041), Staff did not have time to review this item while on-site. Staff

requests the Operator submit a copy of their amended procedure for review with their response to this inspection.

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

Informal Conference Requested: Yes ☐ No ☐

Operator Name: City of LaFayette

Docket Number: 37061

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 LaFayette Utilities	)	**DOCKET NO. 37061**
	)	
	)	
	)	

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

*David Hamilton, City Manager
City of LaFayette Utilities
P.O. Box 89
LaFayette, GA 30728
dhamilton@cityoflafayettega.org

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

Respectfully Submitted this _____ day of March 2026:

Cathy Nesbitt

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