COMMISSIONERS

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

REECE McALISTER
EXECUTIVE DIRECTOR

MICHELLE THEBERT
FACILITIES PROTECTION UNIT DIRECTOR

FILED
OCT 0 6 2026
EXECUTIVE SECRETARY
GPSC

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. 37047

City of Douglas Gas System
P.O. Box 470
Douglas, GA 31534

DOCKET# 37047
DOCUMENT# 229044

REF: Follow Up Inspection # JJ25-010

☐ Certified Mail ☐ Regular Mail ☑ Email

Attention: Charles Davis

On February 3, 2025, a representative of the Georgia Public Service Commission Pipeline Safety/Facilities Protection Office conducted an on-site inspection of your gas system and found that previously identified probable violation(s) of the Pipeline Safety Regulations have either been cleared or are continuing, as identified below.

- ☒ Previously existing probable violation(s) has/have been cleared.
- ☐ Previously existing probable violation(s) still exist.
- ☐ Additional Enforcement
  - ☐ Notice of Proposed Violation
  - ☐ Notice of Proposed Violation with Proposed Civil Penalty
  - ☐ Warning Letter
  - ☐ Letter of Concern
  - ☐ Observed Issue
- ☐ Consent Agreement Pending

The enclosed inspection report numbered JJ25-010 is provided for your information and file.

Please review and respond to this report in accordance with the attached Instructions for Responding to Enforcement Actions, Enforcement Letters, and Notifications Issued by the Georgia Public Service Commission. Please refer to Docket No. 37047 in your response.

Please let me know if there are any questions concerning this report at (404) 985-4271 or mthebert@psc.ga.gov. Thank you for your continuing contribution toward increased pipeline safety.

Sincerely,

Michelle Thebert

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

COMMISSIONERS

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

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: JJ25-010

OPERATOR: City of Douglas Gas System

INVESTIGATOR: Joe Jones

INSPECTION DATE: February 3, 2025 REPORT MAILED DATE: September 30, 2026

Any questions concerning this report may be directed to the above address or by telephoning (404) 463-6526.

1. PURPOSE OF INSPECTION

To conduct a follow-up inspection of the Operators previously existing probable violations.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
192.181(a)	Each high-pressure distribution system must have valves spaced so as to reduce the time to...	DL22-003	3/1/2022
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	DL23-019	7/13/2023

3. CLEARED VIOLATIONS

Cleared on 2/3/2025

Violation	Description	Inspection#	Date
192.625	Odorization of gas.	DL22-003	3/1/2022

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF DOUGLAS NARTUAL GAS SYSYTEM / FOLLOW-UP INSPECTION
INSPECTION NUMBER JJ25-010 / DOCKET NUMBER 37047

On February 3, 2025, Staff reported to the Douglas Gas Department to complete this follow-up inspection of the Operator's previously existing probable violation.

During this inspection the Operator was represented by:
Andrew Jackson – Gas Superintendent
Ty-conney Nelson – Compliance Office
Wade Sharpe – MGAG/SRCS (consultant)
Mike Hudson – MGAG/SRCS (consultant)

Commission Staff was represented by:
Joseph Jones - Lead Inspector
Glen Murphy - Pipeline Safety Inspector
Eric Atkins – Pipeline Safety Inspector

At the time of this inspection the City of Douglas Gas System was under two (2) previously existing probable violations. Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATION CLEARED

1. In regard to the probable violation of 49CFR, §192.625(a) which was cited in Inspection Number DL22-003, in that inspection Staff stated

> "The odorant testing machine used by the City of Douglas is calibrated to read 1.0 for 20%, or 1/5th, of the lower explosive limit of natural gas. During this inspection Staff reviewed Douglas Gas System's records for odorant checks and found readings that failed to meet one-fifth of the lower explosive limit. From January 2017 thru December 2019 all four of the Operator's sniff points had readings between 1.02 thru 1.98. In March 2020 and August 2020 records show all four of the Operator's sniff points had readings between 1.04 thru 1.16. These levels indicate that the City of Douglas has failed to odorize their gas system as required by §192.625.
>
> PROBABLE VIOLATION: The City of Douglas Gas failed to ensure that their natural system was odorized so that at a concentration in air of one-fifth of the lower explosive limit, the gas was readily detectable by a person with a normal sense of smell.
>
> Staff proposed a Civil Penalty of $5,000.00 for this probable violation:

FIRST FOLLOW UP INSPECTION: On August 17-18, 2022, Staff performed a Methane Emission Inspection on the City of Douglas (Ref. Inspection Number DL22-041). In that inspection Staff stated: "At the time of this inspection the City of Douglas was under eleven (11) previous existing probable violations. Staff did not review these violations at the time of this inspection."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number DL22-041, dated December 13, 2022, the City of Dougles stated that: "The City of Douglas has not received the Report for Inspection DL22-003 in which the Enforcement Actions listed above are initially cited and,

therefore, cannot provide information on the type or status of these Actions. Upon receipt of the Report, a full response will be filed."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number DL22-003, dated February 20, 2023, the City of Douglas stated: "The City of Douglas has addressed this issue and is confident that odorant sampling is being performed correctly and that the level of odorant in the system is adequate."

The Operator requested an informal conference to discuss this probable violation and the $5,000-dollar civil penalty.

REVIEW OF OPERATOR FIRST RESPONSE: On February 21, 2023, Pipeline Safety Staff received a response from the City of Douglas for a comprehensive inspection DL22-003. Staff reviewed the City of Douglas's response letter which was submitted for Inspection Number DL22-003 on February 27-28, 2023. (Ref. Inspection Number DL23-011) In that review Staff stated: "Staff has reviewed the Operators response via email and found that the Operator did not attach any documentation regarding this probable violation. This Probable Violation has a recommended $5000.00 proposed penalty. This Probable Violation cannot be cleared at this time."

INFORMAL CONFERENCE: On March 30, 2023, the Operator received an informal conference as requested in their response to Inspection Number DL22-003.

REVIEW OF OPERATOR SECOND RESPONSE: On March 30, 2023, the Director and Staff conducted an informal conference with The City of Douglas. On the same day the City of Douglas emailed Staff documentation for review of the Probable Violations. Staff conducted a second review, this time with documentation. (Ref. Inspection Number DL23-019) In this review Staff stated:

> "On March 30, 2023, the City of Douglas submitted a second response to Inspection Number DL22-003 by e-mail and stated: "The City of Douglas has addressed this issue and is confident that odorant sampling is being performed correctly and the level of odorant in the system is adequate." The Operator also sent a copy of a new Sniff/Odorometer Test form which documents their odorant sampling for Jan – Mar 2023. Staff reviewed the Operators response and the documents provided and found that it fails to adequately address this violation. Staff found that the Operators response does not indicate what the issue was that they "addressed." Was it an equipment malfunction; was it a personnel training/qualification issue; or was it a combination of both?
>
> Staff determined that this violation could not be cleared at this time."

SECOND FOLLOW UP INSPECTION: On August 29, 2023, Commission Staff reported to the City of Douglas to conduct an Operator Qualification (OQ) program inspection and a Protocol 9 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ23-030) In that inspection Staff stated: "At the time of this inspection the City of Douglas had two (2) previously existing probable violations. Because these items were being addressed under Review of Operator Response Inspection Number DL23-019 Staff did not issue a follow-up inspection with this OQ inspection. The Operator will need to update the status of any continuing violations in their response to this inspection."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number DJ23-030, dated February 20, 2024, the City of Dougles stated that: The City of Douglas has addressed this issue and is confident that odorant sampling is being performed correctly and that the level of odorant in the system is adequate.

THIRD FOLLOW-UP INSPECTION: On February 3, 2025, Staff conducted a Follow-up Inspection of the Operators previously existing probable violations. (Ref. Inspection Number JJ25-110) In this inspection, Staff determined that the Operator has taken action to address the probable violation by providing documentation to support that they have Procedures and Operator Qualification Plan. The Operator conducted training on May 6, 2022, in a classroom setting using operations and Maintenance procedures, Training was documented in OQ keeper and is later reflected on the Energy WorldNet. The previously inadequate method has since been corrected . Staff also determined that this violation had been cleared in the Review of Operator Response under Inspection Number DL23-019, but had not been cleared in the database.

Staff determined that this probable violation can be cleared at this time; however, the Operator still needs to address the $5,000.00 proposed civil penalty for this violation.

PROBABLE VIOLATION CONTINUING

1) In regard to the probable violation of 49CFR §192.181(a) which was cited in Inspection Number DL22-003; in that inspection Staff stated:

> "During this inspection the Operator was unable to provide a process for the placement of distribution line valves in accordance with Part 192.181. Because the Operator could not define where these valves are required Staff could not determine if the Operator could perform an emergency shutdown and/or pressure reduction in any section of their pipeline system if it were necessary to minimize hazards to life or property as required by §192.615(a)(6)
>
> Because the Operator could not demonstrate an actual process of how they determine where to install specific valves, Staff cannot determine if the Operator has complied with the requirements of §191.181(a), or if they can meet the requirements of §192.615(a)(6).
>
> During this inspection Staff found no procedures for placement of valves for emergency response and regulator stations. Operator was unable to provide a process in their emergency plan how, when or where an emergency shutdown would take place in any section of their system. Also, the Operator's emergency valves listed in their emergency plan do not identify which valve or valves shuts off a particular pipeline section in the event of an emergency.
>
> REQUIRED AMENDMENT: The City of Douglas must amend their procedures to address the placement of distribution line valves for their system."

FIRST FOLLOW UP INSPECTION: On August 17-18, 2022, Staff performed a Methane Emission Inspection on the City of Douglas (Ref. Inspection Number DL22-041). In that inspection Staff

stated: "At the time of this inspection the City of Douglas was under eleven (11) previous existing probable violations. Staff did not review these violations at the time of this inspection."

FIRST OPERATOR RESPONSE: In their response letter to Inspection Number DL22-041, dated December 13, 2022, the City of Dougles stated that: "The City of Douglas has not received the Report for Inspection DL22-003 in which the Enforcement Actions listed above are initially cited and, therefore, cannot provide information on the type or status of these Actions. Upon receipt of the Report, a full response will be filed."

SECOND OPERATOR RESPONSE: In their response letter to Inspection Number DL22-003, dated February 20, 2023, the City of Douglas stated

OPERATOR RESPONSE: In their response letter to Inspection Number DL22-003, dated February 21, 2023, the Operator stated that: "The City of Douglas will implement a Construction Manual by 3-31-2023 that will include provisions related to valve placement in newly constructed distribution mains".

REVIEW OF OPERATOR FIRST RESPONSE: On February 21, 2023, Pipeline Safety Staff received a response from the City of Douglas for a comprehensive inspection DL22-003. Staff reviewed the City of Douglas's response letter which was submitted for Inspection Number DL22-003 on February 27-28, 2023. (Ref. Inspection Number DL23-011) In that review Staff stated: "Staff has reviewed the Operators response via email and found that the Operator did not attach any documentation regarding this probable violation. This Probable Violation cannot be cleared at this time."

REVIEW OF OPERATOR SECOND RESPONSE: On March 30, 2023, the Director and Staff conducted an informal conference with The City of Douglas. On the same day the City of Douglas emailed Staff documentation for review of the Probable Violations. Staff conducted a second review, this time with documentation. (Ref. Inspection Number DL23-019) In this review Staff stated:

> "On March 30,2023, The City of Douglas emailed Staff documentation stating: The City of Douglas will implement a Construction Manual by 3-31-2023 that will include provisions related to valve placement in newly constructed distribution mains.
> Staff found this is located in section 7 (E) Distribution Line Valves.
>
> Staff has reviewed the Operators response and the documents provided by the Operator via email and found that it does not adequately addresses this amendment. Operator procedure is only considerations and not a process. Operator was unable to provide a process in their emergency plan how, when or where an emergency shutdown would take place in any section of their system. Also, the Operator's emergency valves listed in their emergency plan do not identify which valve or valves shut off a particular pipeline section in the event of an emergency.
>
> Staff determined that this violation could not be cleared at this time."

SECOND FOLLOW UP INSPECTION: On August 29, 2023, Commission Staff reported to the City of Douglas to conduct an Operator Qualification (OQ) program inspection and a Protocol 9 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ23-030) In that inspection Staff stated: "At the time of this inspection the City of Douglas had two (2) previously

existing probable violations. Because these items were being addressed under Review of Operator Response Inspection Number DL23-019 Staff did not issue a follow-up inspection with this OQ inspection. The Operator will need to update the status of any continuing violations in their response to this inspection."

THIRD OPERATOR RESPONSE: In their response letter to Inspection Number DJ23-030, dated February 20, 2024, the City of Dougles stated that: "The City of Douglas has implemented a Construction Manual that include provisions related to valve placement in newly constructed distribution mains."

THIRD FOLLOW-UP INSPECTION: On February 3, 2025, Staff conducted a Follow-up Inspection of the Operators previously existing probable violations. (Ref. Inspection Number JJ25-010)

In this inspection, Staff determined that the Operator has taken some action to address the probable violation by providing documentation to support that they have Procedures in case of an emergency. The procedures the Operator has added refers back to their Construction Manual on page 17 section (E) that was dated 3/21/2023. Operator states they will Install valves in all high-pressure distribution systems (systems operating over 7" W.C.) at locations that will reduce the time to shut down each section of the system in an emergency.

However, Staff reviewed Douglas's updated procedure with the Facilities Protection Supervisor, and determined that the Operator's Construction Manual, section C "Distribution Line Valves (Ref. §192.181)" is guidance criteria. However, while this information is useful for developing a valve placement procedure, it lacks any specificity which would make it a suitable procedure for the placement of valves. For example:

- When would a different pipe size or material require a valve to be installed?
- What are the specific areas served (paving business, etc.) that Douglas wants valves installed?
- Are there any specific barriers (rivers, highways, railroads) in the Douglas Gas System area of operation where valves need to be placed?
- How many customers, and in what time frame is Douglas Gas System prepared to restore service to after a section of main is shut down for an emergency?
- What are the areas with operating pressures or feeds where valves are required?
- Or, in consideration of the original NTSB recommendation, given the number of employees available during normal work hours vs. after-hour emergency calls, what is the desired response time for Douglas Gas System personnel to isolate a section of main?
- Or, in consideration of the original NTSB recommendation, when considering the number of employees available during normal work hours vs. after-hours emergency calls, what is the number of valves that Douglas wants their employees to have to operate to shut down a section of main in the desired time frame?

Staff determined that the City of Douglas Gas System has not developed a suitable process on how to determine where distribution line valves are to be placed in their system.

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

Please review and respond to this report in accordance with the attached instructions for Responding to Enforcement Letters Issued by the Georgia Public Service Commission.

OPERATOR RESPONSE FORM

Operator Name: City of Douglas

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37047

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	$_____
☐ 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: _____

_____

_____

_____

_____

_____

_____

_____

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 Douglas Gas System	)	**DOCKET NO. 37047**
	)	
	)	
	)	

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

*Charles Davis, City Manager
City of Douglas Gas System
P.O. Box 470
Douglas, GA 31534

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

Respectfully Submitted this _____ day of ~~September~~ October 2026:

Cathy Nesbitt

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