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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. 37043

City of Dawson Gas & Water Dept.
P. O. Box 190
Dawson, GA 39842

REF: Comprehensive Inspection # JJ25-041

DOCKET# 37043
DOCUMENT# 229046

☒ Certified Mail ☐ Regular Mail ☐ Email

Attention: Tracy Hester

On June 23, 2025, a representative of the Georgia Public Service Commission Pipeline/Facilities Safety Office conducted an inspection of your gas system. The enclosed inspection report numbered JJ25-041 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. 37043 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

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: JJ25-041

OPERATOR: City of Dawson Gas & Water Dept.

INVESTIGATOR: Joe Jones

INSPECTION DATE: June 23, 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 comprehensive inspection of the Operators plans, programs, procedures, pipeline, and pipeline facilities for compliance with the minimum federal safety standards in 49CFR Parts 191 and 192.

2. CONTINUING VIOLATIONS

Violation	Description	Inspection#	Date
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	DL23-001	1/9/2023
Consent Agreement Pending	Operator is negotiating Consent Agreement with the FPU Director	DC24-028	7/8/2024

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

Violation	Description	Inspection#	Date
191.11	Distribution system: Annual report.	JJ25-041	6/23/2025
192.16	Customer notification.	JJ25-041	6/23/2025
192.603(b)	Each operator shall keep records necessary to administer the procedures established under §192.605.	JJ25-041	6/23/2025
192.479(a)	Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the...	JJ25-041	6/23/2025
192.605(b)(8)	Periodically reviewing the work done by operator personnel to determine the effectiveness and...	JJ25-041	6/23/2025

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF DAWSON GAS DEPARTMENT / COMPREHENSIVE INSPECTION
INSPECTION NUMBER JJ25-041 / DOCKET NUMBER 37043

From June 22nd through 26th, Staff reported to the City of Dawson Gas Department to perform a comprehensive inspection of the Operator's plans, procedures, programs, records and pipeline facilities for compliance with the minimum federal safety standards and conduct Protocol 9 OQ inspections for compliance with the minimum federal safety standards. An exit interview was conducted on June 26th.

During this inspection the Operator was represented by:
Cherysh Green Caldwell – City Manager
Michael Sinequfield – Gas Superintendent
Joseph Carter – Gas Technician
Perter Schultz – Harp & Associates (Consultant)
John Batz - Harp & Associates
Kyle Adams - Harp & Associates (Odorant Technician)

Commission Staff were represented by:
Joseph Jones – Lead Inspector
Chuck Whitaker – Pipeline Safety Inspector

At the time of this inspection, the City of Dawson was under no previously existing probable violation; however, the City of Dawson is negotiating a Consent Agreement with the FPU Director referenced in inspection # DC24-028 for inspection # DL23-001.

During this inspection Staff reviewed the City of Dawson's written operations and maintenance procedures, records, and gas facilities for compliance with 49 CFR Parts 191 and 192, and the GPSC rules for safe operation of a natural gas distribution system. Staff reviewed the City of Dawson's Emergency Manual, the Operations and Maintenance Manual and the records for conducting regular operations on their gas system including the collection of field data required for the Operator's DIMP program. Staff also conducted field inspection of randomly selected pipeline field facilities located within the City of Dawson and Terrell County including leak repairs, pressure station and pressure recording devices, right of way conditions, atmospheric corrosion control, cathodic protection readings, odorant testing, and accessibility of critical valves.

NOTICE OF PROBABLE VIOLATION

As a result of this inspection Staff found that the City of Dawson was in probable violation of the minimum federal safety standards; specifically:

1) CODE REQUIREMENT: §192.16 Customer notification
   (d) Each operator must make the following records available for inspection by the Administrator or a State agency participating under 49 U.S.C. 60105 or 60106:
   (2) Evidence that notices have been sent to customers within the previous 3 years.

   STAFF COMMENTS: PHMSA comprehensive form for records.
   Question #6. Procedures / Records / Field Observation – Do records indicate the customer notification process satisfies the requirements of 192.16?

   Subpart A page 18 of the operators O&M Manuel states

   "The City of Dawson Gas Superintendent or his designee shall notify each customer no later than 90 days after the customer first receives gas at a particular location. Notification will consist of a written letter given to each gas customer, which they must sign, date and

return back to the operator within 5 business days and all documentation sent to the Gas Superintendent who will be required to maintain these as permanent records. This may be handled by Bill Stuffer's; mail-outs or hand delivery to each customer by meter readers or gas department employees. This will be handled by letters at City Hall that each customer requesting gas service will be required to sign and date before service is turned on at their location." And "The City of Dawson Gas Superintendent must maintain in his office on a permanent basis, a copy of the notice currently in use and evidence that notices have been sent to customers within the previous three years."

Staff requested documentation verifying the delivery of customer notifications; the Operator could not provide any documentation that notifications were being performed.

PROBABLE VIOLATION: The City of Dawson's Natural Gas Department failed to maintain records required under §192.16(d), which demonstrate that they notified each customer once in writing of the requirements under §192.16(b), as required by §192.16(c) and their O&M procedure.

2) 49 CFR 191.11 Distribution System: Annual Reports.
(a) General. Except as provided in paragraph (b) of this section, each operator of a distribution pipeline system must submit an annual report for that system on DOT Form PHMSA F 7100.1-1. This report must be submitted each year, not later than March 15, for the preceding calendar year.

STAFF COMMENTS: PHMSA comprehensive form for records.
Question #4. Annual Report Records – Have complete and accurate Annual Reports been submitted?

During this inspection Staff reviewed work orders and discovered several instances where reportable leaks were discovered and fixed that were not reported on the City of Dawson's annual 7100 reports. Staff noted that the last time the City of Dawson reported a leak was in 2018.

PROBABLE VIOLATION: The City of Dawson's Natural Gas department failed to report all required leak data associated with their annual 7100 reports.

3) 49 CFR, §192.479 - Atmospheric corrosion control; General.
(a) Each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, except pipelines under paragraph (c) of this section.

STAFF COMMENTS: PHMSA comprehensive form for records.
Question #27. Atmospheric Corrosion Monitoring - Do field observations indicate that pipe exposed to atmospheric corrosion is properly coated?

Staff found numerous locations across the City of Dawson Gas distribution system where above ground piping exposed to the atmosphere had not received remedial action to address atmospheric corrosion issues.

PROBABLE VIOLATION: The City of Dawson failed to clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere.

WARNING LETTER

1) §192.603 General provisions
   (b) Each operator shall keep records necessary to administer the procedures established under §192.605.

   STAFFS COMMENTS: During this inspection Staff noted multiple instances where work orders provided by the City of Dawson were not completed with all of the required documentation.

   PROBABLE VIOLATION: The City of Dawson failed to maintain records which demonstrate that they have complained with their O&M procedures.

2) §192.605 Procedural manual for operations, maintenance, and emergencies
   (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
      (8) Periodically reviewing the work done by operator personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures when deficiencies are found.

   STAFFS COMMENTS: The City of Dawson's O&M page 93 subpart L, states that the Gas Superintendent will review and sign off on all distribution orders to verify all work and information is complete. During this inspection Staff noted multiple instances, particularly with work orders submitted by the City of Dawson's contractors, that were incomplete, and which had no indication of ever being reviewed.

   PROBABLE VIOLATION: The City of Dawson failed to demonstrate that they are periodically reviewing the work done by their personnel as required by §192.605(b)(8) and their O&M procedures.

NOTICE OF AMENDMENT

1) 49 CFR 191.11 Distribution System: Annual Reports.
   (a) General. Except as provided in paragraph (b) of this section, each operator of a distribution pipeline system must submit an annual report for that system on DOT Form PHMSA F 7100.1-1. This report must be submitted each year, not later than March 15, for the preceding calendar year.

   STAFF COMMENTS: During this inspection Staff reviewed work orders and discovered several instances where reportable leaks were discovered and fixed that were not reported on the City of Dawson's annual 7100 reports. Staff noted that the last time the City of Dawson reported a leak was in 2018.

   REQUIRED AMENDMENT: The City of Dawson must review their work orders and leak survey records for the last 10 years to determine what leaks were reportable, and then update their annual PHMSA distribution system reports. Any changes to the annual reports must also be reviewed for any updates that will be required to the City of Dawson's Distribution Integrity Management (DIMP) Plan.

LETTER OF CONCERN

1) Under the Pipeline and Hazardous Materials Safety Administrations (PHMSA) Guidelines for States Participating in the Pipeline Safety Program, Staff are tasked with reviewing and evaluating operators procedures and actions to address recommendations from the National Transportation Safety Board (NTSB) and PHMSA advisory bulletins. During this inspection Staff found that the City of Dawson had neither a procedure in place, nor any records to demonstrate that that they had reviewed any of these items.

   STAFFS CONCERN: Staff are concerned that in the event of an accident or incident the Operator will not be able to demonstrate that they performed a review of the relevant NTSB and/or PHMSA notices, or what actions they decided to take, or not to take, in regard to the notices. Staff recommends that the Operator develop a procedure to review these bulletins and then document what actions they took in regard to the notices.

2) §192.1007 What are the required elements of an integrity management plan?
   A written integrity management plan must contain procedures for developing and implementing the following elements:
   (e) Measure performance, monitor results, and evaluate effectiveness.
      (1) Develop and monitor performance measures from an established baseline to evaluate the effectiveness of its IM program. An operator must consider the results of its performance monitoring in periodically re-evaluating the threats and risks. These performance measures must include the following:
         (i) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) of this subchapter (or total number of leaks if all leaks are repaired when found), categorized by cause;
         (ii) Number of excavation damages;
         (iii) Number of excavation tickets (receipt of information by the underground facility operator from the notification center);
         (iv) Total number of leaks either eliminated or repaired, categorized by cause;
         (v) Number of hazardous leaks either eliminated or repaired as required by § 192.703(c) (or total number of leaks if all leaks are repaired when found), categorized by material; and
         (vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the operator's IM program in controlling each identified threat.

   STAFFS CONCERN: During this inspection Staff noted multiple instances where the City of Dawson's records were either not completed correctly or were not reviewed for accuracy. Additionally, Staff noted instances where reportable leaks were not reported on the City of Dawson's annual PHMSA gas distribution report as required by 49CFR, §191.11. Staff is concerned that the cumulative effect of these errors is contributing to deficiencies in the Operators Distribution Integrity Management Program, which is scheduled for inspection next year.

OPERATOR QUALIFICATION PROTOCOL 9 FIELD EVALUATIONS

During this inspection Staff performed three (3) OQ Protocol 9 field evaluations.
Joseph Cater, Gas Tech performed:
- Task #1241 - Out Leak Investigation qualified 9/26/2022thru 9/25/2025
- Task #0101 – Inspect Rectifier and Obtain Readings, qualified 1/24/2022 thru 1/23/2027
- Task #0681 – Joining of Plastic Pipe Stab Fittings, qualified 3/6/2025 thru 3/5/2025

The Operator provided the current qualification records for the individual before he performed each of the tasks covered. During the field reviews, Staff verified that Mr. Carter was able to perform each task by following the company approved procedures and that he was able to identify the abnormal operating conditions associated with each task and explain a course of action to mitigate the condition.

PROPOSED CIVIL PENALTY

Under Commission Rule 515-9-1.01, by virtue of the authority vested in the Commission by law and pursuant to orders issued by the Commission on May 4, 1967, July 6, 1967, April 23, 1968, and October 29, 1970, all Rules and Regulations prescribed by the United States Department of Transportation applicable to the "Transportation of Natural and Other Gas by Pipeline: Minimum Safety Standards" (C.F.R. 49, Parts 191 and 192) are by this Rule made the Rules and Regulations of the Georgia Public Service Commission for the safe installation and operation of all natural gas transmission and distribution facilities by companies subject to the jurisdiction of the Commission within this State.

Under Commission Rule 515-9-3-.08 (Written Formal Notice of Violation), the Commission may propose a civil penalty in conjunction with this notice of probable violation. Further, the City of Dawson is subject to civil penalties under O.C.G.A. § 46-2-91(b) which states that: Any operator which violates any rule or regulation of the commission prescribed pursuant to subsection (i) of Code Section 46-2-20, or which fails, neglects, or refuses to comply with any order after notice thereof, shall be liable to a penalty not to exceed the maximum penalties provided for in 49 C.F.R. Section 190.223.

Staff has reviewed the circumstances surrounding the probable violations cited in this report and has recommended the civil penalty/penalties listed below. Please note that this recommended amount is less than the amount authorized by Georgia law.

Item #	Code / Rule	Description	Proposed Penalty
1	§192,16(a)(2)	Customer Notification	$5,000.00
2	§191.11(a)	Distribution System: Annual Reports	$5,000.00
3	§192.479(a)	Atmospheric corrosion control; General	$5,000.00
TOTAL PROPOSED PENALTY			$15,000.00

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 Dawson

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37043

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 Dawson Gas & Water Department	)	**DOCKET NO. 37043**
	)	
	)	
	)	

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

*Tracy Hester, City Manager
City of Dawson Gas & Water Department
P.O. Box 190
Dawson, GA 39842
tracyhester@cityofdawson.org

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

Respectfully Submitted this _____ day of October 2026:

Cathy Nesbitt

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