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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. 37059

DOCKET# 37059
DOCUMENT# 229077

City of Hogansville Gas System
400 East Main Street
Hogansville, GA 30230

REF: Comprehensive Inspection # GM25-027

☐ Certified Mail ☐ Regular Mail ☒ Email

Attention: Ms. Lisa Kelly

On June 9, 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 GM25-027 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. 37059 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

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REPORT OF NATURAL GAS SAFETY

INSPECTION NO: GM25-027

OPERATOR: City of Hogansville Gas System

INVESTIGATOR: Glen Murphy

INSPECTION DATE: June 9, 2025 REPORT MAILED DATE: October 7, 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

3. CLEARED VIOLATIONS

Cleared on 6/9/2025

Violation	Description	Inspection#	Date
192.1007(f)	Periodic Evaluation and Improvement.	JS24-034	10/8/2024
192.1007(b)	Identify threats. The operator must consider the following categories of threats to each gas...	JS24-034	10/8/2024

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF HOGANSVILLE NATURAL GAS / COMPREHENSIVE INSPECTION
INSPECTION NUMBER GM25-027/ DOCKET NUMBER 37059

On June 9, 2025, Staff reported to the City of Hogansville 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. An exit interview was conducted on June 12, 2025.

During this inspection the Operator was represented by:
Lisa Kelly - City Manager
Oasis Nicholes – Assistant City Manager
Ryan Diaz - Gas Superintendent
Chris Welborn – MGAG/SRCS (Consultant)
Benji Wise – MGAG/SRCS (Consultant)

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

At the time of this inspection the City of Hogansville was under two previously existing probable violations. These items are addressed under Follow-up Inspection Number EA25-018.

NO VIOLATIONS FOUND

During this inspection, Staff performed a comprehensive inspection of the Operator's emergency and operations 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 performed field inspections on pipeline facilities in Troupe County.

During the field evaluation, Staff observed the Operator's personnel perform four (4) Protocol 9 OQ inspections in the Hogansville service jurisdiction. The Operator provided individual qualifications for Ryan Diaz and Matthew (Baylor) Wise to perform covered tasks. Staff examined the individual records before observing the performance in the field. Staff verified that qualification records for this individual were current.

Ryan Diaz (Gas Superintendent) performed Task #1211- Perform Periodic Sampling of Odorization: Qualified 1/15/2025 through 1/15/2030

Mathew (Baylor) Wise (Gas Utility Worker) performed
- Task # 0301 – Manually Opening and Closing Valves: 1/17/2024 through 1/17/2027
- Task# 1241 – Outside Leak Investigation: Qualified 1/17/ through 1/17/2027
- Task # 0681 – Joining of Plastic Pipe – Stab Fittings; and Task #1301 Install and Maintain Pipeline Markers.

Staff verified that the individuals were able to perform the covered tasks according to the procedures and was able to identify generic and task specific abnormal conditions and define the applicable actions.

ITEMS OF CONCERN

1. 49CFR, §192.721 Distribution Systems: Patrolling.
   (b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled -

(2) Outside business districts, at intervals not exceeding 7 1/2 months, but at least twice each calendar year.

STAFFS COMMENT: During this inspection, Staff inspected a section of distribution pipeline beside Highway 100, on both sides of Yellow Jacket Creek, and determined that the growth and foliage was so dense that Staff was not able to visibly acknowledge the existence of line markers at or near Yellow Jacket Creek.

On the morning of Thursday, June 12, 2025, City of Hogansville provided evidence (pictures of HWY 100 ROW) being cleared with Line Markers present. Being that the line markers were present, but not visible until growth and foliage was removed, Staff determined this to be an Item of Concern.

STAFFS CONCERN: Staff is concerned that the pipeline facilities in this location were allowed to reach this condition. Staff would also note that this location was prominent enough that this condition should have also been recognized and addressed through the Operators continuing surveillance program.

2. 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 Hogansville 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.

As a result of this inspection Staff noted no probable violations of the minimum federal safety standards.

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 Hogansville

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37059

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 Hogansville Gas System	)	**DOCKET NO. 37059**
	)	
	)	
	)	

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

* Lisa Kelly, City Manager
City of Hogansville Gas System
400 East Main Street
Hogansville, GA 30230
lisa.kelly@cityofhogansville.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:

Morgan Mitchell

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