COMMISSIONERS

JASON SHAW , Chairman
FITZ JOHNSON , Vice-Chairman
TIM G. ECHOLS
LAUREN "BUBBA" McDONALD
TRICIA PRIDEMORE

FILED
OCT 2 9 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. 37074

City of Ocilla Gas Department
PO Box 626
113 North Erwin St
Ocilla, GA 31774

DOCKET# 37074
DOCUMENT# 229300

REF: Follow Up Inspection # JJ25-050

☐ Certified Mail ☐ Regular Mail ☑ Email

Attention: Mr. Melvin D. Harper II

On August 18, 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 JJ25-050 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. 37074 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 by cw

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: JJ25-050

OPERATOR: City of Ocilla Gas Department

INVESTIGATOR: Joe Jones

INSPECTION DATE: August 18, 2025 REPORT MAILED DATE: October 23, 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
192.13(c)	Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and...	AT19-022	5/29/2019
199.241	Training for supervisors.	JS19-034	7/23/2019
199.117	Recordkeeping	JS19-034	7/23/2019
40.333	What records must employers keep?	JS19-034	7/23/2019
199.105(c)(6)	The operator shall randomly select a sufficient number of covered employees for testing during...	JS19-034	7/23/2019
199.115(a)	The operator remains responsible for ensuring that the requirements of this part are complied with	JS19-034	7/23/2019
199.113(c)	Supervisory Personnel Training (Drug)	JS19-034	7/23/2019
40.11	What are the general responsibilities of employers under this regulation?	JS19-034	7/23/2019
40.15(b)	As an employer, you are responsible for ensuring that the service agents you use meet the...	JS19-034	7/23/2019
515-9-3-.08	Written Formal Notice of Violation	JJ20-015	3/16/2020
192.605(a)	Each operator shall prepare and follow for each pipeline, a manual of written procedures for...	JJ20-016	3/10/2020
192.613(a)	Continuing Surveillance - Each operator shall have a procedure for continuing surveillance of...	JJ22-016	3/15/2022
192.703(c)	Hazardous leaks must be repaired promptly.	JJ22-016	3/15/2022
192.199(h)	Except for a valve that will isolate the system under protection from its source of pressure...	JJ22-016	3/15/2022
192.481(c)	If atmospheric corrosion is found during an inspection, the operator must provide protection...	JJ22-016	3/15/2022
192.455 (e)	Aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an...	JJ22-016	3/15/2022
192.605(b)(2)	Controlling corrosion in accordance with the operations and maintenance requirements of Subpart...	JJ22-016	3/15/2022
192.723(b)	The type and scope of the leakage control program must be determined by the nature of the...	JJ22-016	3/15/2022
192.147(a)	Each flange or flange accessory (other than cast iron) must meet the minimum requirements of...	JJ22-016	3/15/2022

3. CLEARED VIOLATIONS

4. NEW VIOLATIONS

5. OTHER RECOMMENDATIONS/COMMENTS

SEE ATTACHED INSPECTION REPORT

CITY OF OCILLA / FOLLOW-UP INSPECTION
INSPECTION NUMBER JJ25-050 / DOCKET NUMBER 37074

On August 18, 2025, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations.

During this inspection, the Operator was represented by:
Melvin Happer - Mayor
Bruse Wilder – Public Works Superintendent
Donna Prapher – City Clerk
Peter Schultz – Harp & Associates (Consultant)

Commission Staff was represented by:
Joe Jones - Lead Pipeline Safety Inspector.
Glen Murphy – Pipeline Safety Inspector

At the time of this inspection, the City of Ocilla had twenty (20) previously identified probable violations. An informal conference to address these violations and the associated proposed civil penalties was held on August 11, 2025, with the Director of the Facility Protection Unit.

These probable violations include these proposed civil penalties:

Inspection Number	Code Citation	Description	Proposed Penalty
AT19-022	192.13.(c)	Public Awareness	$2,500.00
JS19-034	199.105(c)(6)	Random Testing	$2,500.00
JJ20-015	515-9-3-.08	Failure to respond	$2,500.00
JJ20-016	192.605(a)	Odormeter calibration	$2,500.00
JJ22-016	192.723(b)	Leak survey	$2,500.00
JJ22-016	§192.613(b)	Continuing Surveillance	$2,500.00
JJ22-016	192.481(c)	Atmospheric Corrosion	$2,500.00
JJ22-016	192.703(c)	Hazardous Leaks	$2,500.00
JJ22-016	192.199(h)	Relief Valves	$2,500.00
TOTAL OUTSTANDING PENALTIES			$22,500.00

Staff reviewed these probable violations with the Operator and determined that:

PROBABLE VIOLATIONS CONTINUING

1. In regard to the Probable Violation of 49CFR §192.13(c) which was cited in Inspection Number AT19-022; in that inspection Staff stated

   "COMMENTS: Under §192.616(a), each pipeline operator must develop and implement a written continuing public education program that follows the guidance provided in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference, see § 192.7).

   PROBABLE VIOLATION: The City of Ocilla failed to follow its procedures required by its public awareness program and to establish its written plan with all requirements under this part. The specific deficiencies are identified as Items # 1.05, 2.04, 2.06, and 4.06 from the PHMSA Form 21 PAP Inspection Checklist. Staff notes that Items 2.04, 2.06, and 4.06 were also found to be deficient in the City of Ocilla's previous PAP inspection. (Ref: Inspection Number JM13-040)

PROGRAM DEFICIENCIES

(a) *Question 1.05 – Message Frequency and Message Delivery*
Does the operator's program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

COMMENTS: Operators plan stated customers message frequency would be once a year, non-customers message frequency was not defined.

(b) *Question 2.04 – Baseline Message Delivery Frequency*
Did the operator's delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?

COMMENTS: Operator failed to deliver messages twice a year to their customers as required under API RP 1162.

(c) *Question 2.06 Maintaining Liaison with Emergency Response Officials*
Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator's ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

COMMENTS: Operator failed to maintain liaison with all of their identified Emergency Officials.

(d) *Question 4.06 Measure Bottom-Line Results*
In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines?

COMMENTS: Operator failed to include in their evaluation process the Affected Public audience perception of the safety of the Operators' pipeline system."

Staff proposed a civil penalty of $2,500.00 for this violation.

FIRST OPERATOR RESPONSE: The City of Ocilla failed to provide a response to Inspection Number AT19-022.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ20-015) In that inspection Staff stated:

"During this inspection (JJ20-015) the Operator stated that the City of Ocilla has not received Inspection Number AT19-022 so they have not responded. Because the Operator had not responded, and the Operators personnel had not seen the written report, Staff did not follow-up on this violation. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator on 12/9/2019, and a hard copy was sent out on 12/10/2019."

SECOND OPERATOR RESPONSE: Inspection Number JJ20-015 was sent to the City of Ocilla on June 25, 2020. The City of Ocilla failed to provide a response to Inspection Number JJ20-015 until July 28, 2022. In a response letter that was filed for Inspection Number JJ20-015 and Inspection Number JJ22-017 the City of Ocilla failed to address any specific outstanding violations; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017. In this inspection Staff stated:

"Between December 19, 2019 and June 25, 2020, the City of Ocilla received a total of four (4) inspection reports which proposed civil penalties totaling $10,000 for multiple probable violations of the minimum federal safety standards. Each report was delivered by e-mail and certified mail, and as of the date of this inspection the City of Ocilla has failed to respond to every one of these reports. Should the City of Ocilla fail to respond to this inspection report within 30 days of receipt as required by Commission Rule 515-9-3-.08, Staff will request that the Commission issue a show cause order and schedule a hearing requiring the City of Ocilla to demonstrate why they should not be subject to the penalties set forth by the O.C.G.A. Section 46-2-91."

And

"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers AT19-022, JS19-034 or JJ20-015, or taken any actions to address the probable violations or associated civil penalties in those reports."

THIRD OPERATORS RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

THIRD FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023) Staff determined that the City of Ocilla could not demonstrate that they have taken any action to address this violation."

FOURTH OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the

Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

FOURTH FOLLOW-UP INSPECTION: On July 26-27, 2023, Commission Staff reported to the City of Ocilla to conduct an Operator Qualification (OQ) program inspection and a Protocol 9 inspection for compliance with the minimum federal safety standards. (Ref. Inspection Number DJ23-026) In that inspection Staff stated:

"At the time of this inspection the City of Ocilla had twenty (20) previously existing probable violations. Staff reviewed these probable violations with the Operator, and these are detailed in Follow-up Inspection # JJ23-023."

FIFTH OPERATOR RESPONSE: In their response letter to Inspection Number DJ23-026, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection DJ23-026. On July 26, 2023, Ms. Daphne Jones performed an Operator Qualification inspection (DL23-023). During this Inspection no new Violations were found. The City of Ocilla had a Follow up Inspection on June 26, 2023 (JJ23-023) we are awaiting final determination if any and how many violations were cleared. The City of Ocilla has had the untimely passing of our mayor after these inspections. I have been elected as the new Mayor; my name is Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We have read through the inspection and understand that there were no new violations found. We also understand that there are still numerous open violations needing to be cleared. We would like to ask for an informal hearing with you to discuss the violations and how we can resolve these issues and move forward with our city to be in compliance with the PSC and operate more efficiently."

FIFTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

2. In regard to the Notice of Amendment for §40.11(b) which was sited under Inspection Number JS19-034; in that inspection Staff Stated:

"COMMENT: Question #D.03.a. states - Verify that the laboratory retains all records pertaining to each employee urine specimen for a minimum of two years and also keeps for two years employer-specific data required in §40.111 [§40.109]. While reviewing the Operator's plan, Staff found no mention of how they verify that the laboratory they utilize is retaining all records for the appropriate amount of time.

PROBABLE VIOLATION: The City of Ocilla's drug & alcohol plan failed to address how they will ensure the laboratory they utilize retains all necessary records pertaining to each employee tested according to federal regulations."

FIRST OPERATOR RESPONSE The City of Ocilla failed to provide a response to Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ20-015) In that inspection Staff stated:

"During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

SECOND OPERATOR RESPONSE: The City of Ocilla failed to provide a response to Inspection Number JJ20-015 until July 28, 2022. In a combined response with Inspection Number JJ22-017 the City of Ocilla failed to address any specific violations; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017. In this inspection Staff stated:

"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

THIRD OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

THIRD FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023), Staff reviewed The City of Ocilla's Drug and Alcohol Manual and determined that they will ensure the laboratory they utilize retains all necessary records pertaining to each employee tested according to federal regulations, according to §40.109 and §40.111.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time."

FOURTH OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

FOURTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

3. In regard to the probable violation of 49CFR, §40.15(b) which was cited under Inspection Number JS19-034; in that inspection Staff Stated:

"COMMENT: Inspection Question #B.01.a. states - Verify that Anti-Drug Program positions meet the applicable qualification requirements of Part 40 and Part 199 as follows: Medical Review Officer (MRO) - §40.121 and §199.109(b), Urine Specimen Collector - §40.33, Substance Abuse Professional (SAP) - §40.281.

Staff found the City of Ocilla had no knowledge or documentation to show that their Urine Specimen Collector and Substance Abuse Professional met with all the necessary qualifications of the federal regulations.

PROBABLE VIOLATION: The City of Ocilla could not demonstrate that their urine collectors and Substance Abuse Professional meet with the qualification requirements under Part 40."

FIRST OPERATOR RESPONSE The City of Ocilla failed to provide a response to Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ20-015) In that inspection Staff stated:

> *"During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."*

SECOND OPERATOR RESPONSE: The City of Ocilla failed to provide a response to Inspection Number JJ20-015 until July 28, 2022. In a combined response with Inspection Number JJ22-017 the City of Ocilla failed to address any specific violations; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017. In this inspection Staff stated:

> *"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."*

THIRD OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

THIRD FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

> *"During this inspection (JJ23-023) Staff could not verify that the Operators urine collectors or SAP's meet the qualification requirements under Part 40.*
>
> *While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time."*

FOURTH OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

> *"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our*

Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

FIFTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

4. In regard to the probable violation of §40.333(a)(2) which was cited under Inspection Number JS19-034; in that inspection Staff stated:

"COMMENT: Question #F.01.a. states - Verify that the following records are retained as required by Part 40 and Part 199 and that the records are maintained in a location with controlled access [§40.333(c)]: Information obtained from previous employers under §40.25 concerning drug test results of employees [§40.333(a)(2)],

During this inspection Staff requested documentation for the pre-employment records check required under §40.25. The City of Ocilla was not able to produce any documentation. Staff notes that the Operators testing records indicated that a total of six (6) pre-employment drug test were conducted during CY2017, CY2018, and up to the date of this inspection for CY2019.

PROBABLE VIOLATION: The City of Ocilla failed to obtain and maintain previous employer records regarding drug test results of employees."

FIRST OPERATOR RESPONSE The City of Ocilla failed to provide a response to Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ20-015) In that inspection Staff stated:

"During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

SECOND OPERATOR RESPONSE: The City of Ocilla failed to provide a response to Inspection Number JJ20-015 until July 28, 2022. In a combined response with Inspection Number JJ22-017 the City of Ocilla failed to address any specific violations; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017. In this inspection Staff stated:

> *"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."*

THIRD OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

THIRD FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

> *"During this inspection (JJ23-023) Staff could not verify that the Operator requested the records from previous employers for their new covered employees as required under §40.25."*

FOURTH OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

> *"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"*

FIFTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

5. In regard to the probable violation of 49CFR, §199.105(c)(6) which was cited in Inspection Number JS19-034; in that inspection Staff stated:

"COMMENT: Inspection Question #C.03.c. states - Verify that the operator selects a sufficient number of covered employees for random testing during each calendar year to equal an annual rate not less that the required minimum annual percentage rate.

Staff reviewed records provided by the Operator which indicated that as of July 23, 2019 the City of Ocilla had performed three (3) pre-employment drug test; one (1) post-accident drug test; and no random drug tests.

For CY2018 they performed two (2) post-accident drug test; two (2) pre-employment drug test; and no random drug tests.

For CY2017 they performed one (1) pre-employment drug test; one (1) post-accident drug test; and two (2) random drug test.

PROBABLE VIOLATION: The City of Ocilla failed to conduct and random drug testing of their covered employee during CY2018 or the first two (2) quarters of 2019."

Staff proposed a civil penalty of $2,500.00 for this probable violation.

FIRST OPERATOR RESPONSE The City of Ocilla failed to provide a response to Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ20-015) In that inspection Staff stated:

"During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

SECOND OPERATOR RESPONSE: The City of Ocilla failed to provide a response to Inspection Number JJ20-015 until July 28, 2022. In a combined response with Inspection Number JJ22-017 the City of Ocilla failed to address any specific violations; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017. In this inspection Staff stated:

"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

THIRD OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

THIRD FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

> *"During this inspection (JJ23-023) Staff found that during CY2021 the City of Ocilla did not send anyone for drug testing due to the Covid-19 pandemic. They did provide documentation which indicated they had performed testing for CY's 2022 and 2023.*
>
> While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time. "

FOURTH OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

> *"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"*

FIFTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

6. In regard to the probable violation of §199.113(c) which was sited under Inspection Number JS19-034 in that inspection Staff Stated:

> *"COMMENT: Question #G.01.c. states to - Verify that training under the Employee Assistance Program for supervisory personnel who will determine whether an employee must be drug tested based on reasonable cause must include one 60-minute period of training on the specific, contemporaneous physical, behavioral, and performance indicators of probable drug use.*

During this inspection the City of Ocilla was not able to provide documented evidence showing this training had taken place.

PROBABLE VIOLATION: The City of Ocilla failed to maintain records which demonstrate that their supervisors have been trained as required by §199.113(c)."

FIRST OPERATOR RESPONSE The City of Ocilla failed to provide a response to Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ20-015) In that inspection Staff stated:

"During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

SECOND OPERATOR RESPONSE: The City of Ocilla failed to provide a response to Inspection Number JJ20-015 until July 28, 2022. In a combined response with Inspection Number JJ22-017 the City of Ocilla failed to address any specific violations; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017. In this inspection Staff stated:

"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

THIRD OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

THIRD FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023) Staff determined that the City of Ocilla has records which demonstrate that their supervisors have been trained as required by §199.117(a)(4).

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time."

FOURTH OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had

the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

FOURTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

7. In regard to the probable violation of 49CFR, §199.115(a) which was cited under Inspection Number JS19-034; in that inspection Staff stated:

"COMMENT: Inspection Question #A.01.c. states - If an employer utilizes applicable contractors or subcontractors who perform covered functions and conduct drug testing, education and training as part of the Anti-Drug Program [§199.115], but separate from the employer, verify that there is a process in place and implemented to ensure compliance with Part 199 and Part 40.

During this inspection Staff found that while the City of Ocilla drug program manual states they will review their contractor's drug & alcohol plan, they had no records that it had been done.

PROBABLE VIOLATION: The City of Ocilla could not demonstrate that they had verified that their contractor's drug & alcohol program are in compliance with the requirements of 49CFR, Parts 40 and 199."

FIRST OPERATOR RESPONSE The City of Ocilla failed to provide a response to Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ20-015) In that inspection Staff stated:

"During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified

that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

SECOND OPERATOR RESPONSE: The City of Ocilla failed to provide a response to Inspection Number JJ20-015 until July 28, 2022. In a combined response with Inspection Number JJ22-017 the City of Ocilla failed to address any specific violations; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017. In this inspection Staff stated:

"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

THIRD OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

THIRD FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023) the City of Ocilla provided documentation that they had verified that their contractor's drug & alcohol program has been reviewed

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time."

FOURTH OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

FOURTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff

advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

8. In regard to the probable violation of §199.117(a)(1) which was cited in Inspection Number JS19-034; in that inspection Staff stated:

> *"COMMENT: Question #F.01.a. states - Verify that the following records are retained as required by Part 40 and Part 199 and that the records are maintained in a location with controlled access [§40.333(c)]: Records that demonstrate the collection process conforms to §199.117(a)(1).*
>
> *During this inspection Staff found that that the City of Ocilla had conducted drug testing for their DOT program utilizing a testing form that was not in compliance with the requirements of §40.45.*
>
> *PROBABLE VIOLATION: The City of Ocilla failed to maintain records which demonstrate that their collection process was performed as required under Part 40 and Part 199."*

FIRST OPERATOR RESPONSE The City of Ocilla failed to provide a response to Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ20-015) In that inspection Staff stated:

> *"During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."*

SECOND OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017. In this inspection Staff stated:

> *"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."*

THIRD OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

THIRD FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023) Staff determined that the City of Ocilla maintain records which demonstrate that their collection process was performed as required under Part 40 and Part 199.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time."

FOURTH OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

FOURTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

9. In regard to the probable violation of §199.117(a)(4) which was cited under Inspection Number JS19-034; in that inspection Staff stated:

"COMMENT: Question #F.01.a. states - Verify that the following records are retained as required by Part 40 and Part 199 and that the records are maintained in a location with controlled access [§40.333(c)]: Records confirming that supervisors and employees have been trained as required by §199.117(a)(4).

During this inspection the City of Ocilla was not able to provide records demonstrating supervisors had been trained in detecting possible substance abuse.

PROBABLE VIOLATION: The City of Ocilla failed to maintain records which demonstrate that their supervisors have been trained as required by §199.117(a)(4)."

FIRST OPERATOR RESPONSE The City of Ocilla failed to provide a response to Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ20-015) In that inspection Staff stated:

"During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

SECOND OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-015. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017. In this inspection Staff stated:

"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

THIRD OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

THIRD FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023) Staff determined that the City of Ocilla has records which demonstrate that their supervisors have been trained as required by §199.117(a)(4).

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time."

FOURTH OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr.

Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

FIFTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

10. In regard to the probable violation of §199.241 which was sited in Inspection Number JS19-034; in that inspection Staff Stated:

"COMMENT: Question #I.01.b. states - Verify that supervisors designated to determine whether reasonable suspicion exists to require a covered employee to undergo alcohol testing under §199.225(b) receive at least 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse.

During this inspection the City of Ocilla was not able to provide documented evidence showing this training had taken place.

PROBABLE VIOLATION: The City of Ocilla failed to maintain records which demonstrate that their supervisors have been trained as required by §199.241."

FIRST OPERATOR RESPONSE The City of Ocilla failed to provide a response to Inspection Number JS19-034.

FIRST FOLLOW-UP INSPECTION: On March 16, 2020, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ20-015) In that inspection Staff stated:

"During this inspection (JJ20-015) Staff found that the Operator has not responded to the above Probable Violation stated in JS19-034. Subsequent to this inspection Staff verified that a copy of this report was emailed to the Operator, and a hard copy was sent out on 1/27/2020."

SECOND OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-015. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017. In this inspection Staff stated:

> *"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."*

THIRD OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla responded to Inspection Number JJ22-017. They failed to address any specific violations in their response; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

THIRD FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

> *"During follow-up inspection (JJ23-023) that took place on June 28, 2023; Staff determined that the City of Ocilla has records which demonstrate that their supervisors received at least 60 minutes of training on the physical, behavioral, speech, and performance indicators of probable alcohol misuse as required.*
>
> *While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time."*

FOURTH OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

> *"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"*

FIFTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director

confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

11. In regard to the probable violation of Commission Rule 515-9-3-.08 which was cited in Inspection Number JJ20-015; in that inspection Staff stated:

"STAFFS COMMENTS: During this inspection (JJ20-015) Staff found that Inspection Number AT19-022 was emailed to the Operator on 12/9/2019, and a hard copy was sent out on 12/10/2019. Inspection Number JS19-034 was emailed to the Operator, and a hard copy was sent out on 1/27/2020. The Operator has not responded to either of these inspection reports.

PROBABLE VIOLATION: The City of Ocilla failed to provide a written response to Inspection Numbers AT19-022 and JS19-034 as required by Commission Rule 515-9-3-.08."

Staff proposed a civil penalty of $2,500.00 for this violation.

FIRST OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla filed a joint response letter for Inspection Numbers JJ20-015 and JJ22-017. In this response letter they failed to address any specific violations; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

FIRST FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's existing Probable Violations. (Ref. Inspection Number JJ22-017) In this inspection Staff stated:

"During this inspection (JJ22-017) Staff found that:

- *Inspection Number AT19-022, which included a proposed civil penalty of $2,500.00, was emailed to the Operator on December 9, 2019, and a hard copy was sent out by certified mail on December 10, 2019. The City of Ocilla failed to provide a response to Inspection Number JJ22-017.*

- *Inspection Number JS19-034, which included a proposed civil penalty of $2,500.00, was emailed to the Operator on January 7, 2020, and a hard copy was sent out by certified mail on the same day. The City of Ocilla failed to provide a response to Inspection Number Js19-034.*

- *Inspection Number JJ20-015, which included a proposed civil penalty of $2,500.00 for the Operators failure to respond to Inspection Numbers AT19-022 and JS19-034, was e-mailed to the Operator on June 12, 2020, and a hard copy was sent out by certified mail on June 25, 2020. The City of Ocilla failed to provide a response to Inspection Number JJ20-015.*

- *Inspection Number JJ20-016, which included a proposed civil penalty of $2,500.00, was emailed to the Operator on June 25, 2020, and a hard copy was*

sent out by certified mail on the same day. The City of Ocilla failed to provide a response to Inspection Number JJ20-016.

Staff determined that the City of Ocilla has not responded to Inspection Numbers AT19-022, JS19-034, JJ20-015 or JJ20-016 and has taken no actions to address the outstanding violations or the $10,000.00 in proposed civil penalties associated with those probable violations."

SECOND OPERATOR RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

THIRD OPERATOR RESPONSE: On July 28, 2022, the City of Ocilla filed a joint response letter for Inspection Numbers JJ20-015 and JJ22-017. In this response letter they failed to address any specific violations; however, they requested that the Commission stay any monetary penalties for a period of 18 months.

SECOND FOLLOWUP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023) Staff met with the City Manager and the Public Works Superintendent. They indicated that the City of Ocilla wanted an informal conference to discuss their outstanding civil penalties, however they have not requested one."

THIRD FOLLOW-UP INSPECTION FOURTH FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

12. In regard to the Probable Violation of 49CFR §192.605(a) which was cited in Inspection Number (JJ20-016); in that inspection Staff stated:

"STAFFS COMMENTS: During this inspection Staff attempted to conduct a Protocol 9 inspection on the Operator's B31Q Task Number 1241-Outside Gas Leak Investigation. Staff noted that the Operators procedure states:

"MAINTENANCE & OPERATION OF INSTRUMENTS
Each instrument used for leak detection and evaluation shall be operated in accordance with the manufacturer's recommended operating instructions."

CALIBRATION OF INSTRUMENTS
Each instrument used for leak detection and evaluation shall be calibrated at the following times in accordance with the manufacturer's recommended calibration instructions."

Staff checked the Operators gas detection device and found that the Operator had no manufacturer's recommended operating instructions nor did they have any record of the equipment being calibrated per their procedures. The Operator could not demonstrate when this equipment had been calibrated, and they had no other equipment available.

PROBABLE VIOLATION: The City of Ocilla failed to ensure that their gas detection device was calibrated and maintained in accordance with their operations and maintenance procedures."

Staff proposed a civil penalty of $2,500.00 for this probable violation.

FIRST OPERATOR RESPONSE: The City of Ocilla failed to file a response to Inspection Number JJ20-016.

FIRST FOLLOW-UP INSPECTION: On March 17, 2022, Commission Staff reported to the City of Ocilla to perform a Follow-up inspection of the Operator's previously existing Probable Violations. (Ref. Insp # JJ22-017) In that inspection Staff stated:

"During this inspection (JJ22-017) Staff found that the City of Ocilla has not responded to Inspection Numbers JS19-034 or JJ20-015 or taken any actions to address the probable violations or associated civil penalties in those reports."

OPERATORS SECOND RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

SECOND FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023) Staff determined that The City of Ocilla was able to show a Certificate of Calibration for their gas detection equipment.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed civil penalty, therefore Staff determined that this violation could not be cleared at this time."

THIRD FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the

corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

13. In regard to the Probable Violation of 49CFR, §192.147(a) which was cited in Inspection Number JJ22-016; in that inspection Staff stated:

"COMMENTS: During this inspection (#JJ22-016) Staff identified, at the Highway 129 N. regulator station that several flange bolts were left with no threads extending through the nut.

PROBABLE VIOLATION: The City of Ocilla Natural Gas System failed to ensure that each of their flanges or flange accessories meet the minimum requirements of ASME/ANSI B 16.5 and MSS SP-44 as required by §192.147(a)."

FIRST OPERATOR RESPONSE: On July 27, 2023 the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023), Staff inspected the regulator station and the work order's and confirmed that the operator has replaced the bolts on the station to meet code standards.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time. "

SECOND OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

SECOND FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

14. In regard to the Probable Violation of 49CFR, §192.199(h) which was cited in Inspection Number JJ22-016; in that inspection Staff stated:

"COMMENTS: During this inspection Staff found the relief valve not locked at the regulator station located at Highway 129 North, Ocilla, Ga.

PROBABLE VIOLATION: The Operator failed to provide for the prevention of unauthorized operation of any stop valve that will make the pressure relief valve or pressure limiting device inoperative at its regulator and relief station."

Staff proposed a civil penalty of $2,500.00 for this probable violation.

FIRST OPERATOR RESPONSE: On July 27, 2023 the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023), Staff reviewed The City of Ocilla work orders and determined that they have mitigated the issues by adding a lock so that it will be inoperative to anyone who is not authorized to operate the valve.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time."

SECOND OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best

efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

SECOND FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

15. In regard to the Notice of Amendment for 49CFR, §192.455(e) which was cited in Inspection Number (JJ22-016); in that inspection Staff stated:

"STAFFS COMMENTS: The Operators O&M Procedures for buried or submerged pipelines installed after July 31, 1971 do not address the requirements of §192.455(e). Staff notes that Operators procedures indicates that they do not have buried or submerged amphoteric metal, however, Staff found no indication that the Operator prevents the installation of aluminum in their system.

REQUIRED AMENDMENT: The City of Ocilla Natural Gas System must amend their procedures to address the requirements of §192.455(e)."

FIRST OPERATOR RESPONSE: On July 27, 2023 the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023), Staff reviewed The City of Ocilla O&M Procedures for buried or submerged pipelines installed after July 31, 1971, has been included in their O&M Procedure manual.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time."

SECOND OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

SECOND FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

16. In regard to the Probable Violation of 49CFR, §192.481(c) which was cited in Inspection Number JJ22-016; in that inspection Staff stated:

"COMMENTS: In the City of Ocilla Operations and Maintenance Procedures manual on page 80, it states:

"All meter sets, regulator stations or exposed metallic portions of the Ocilla gas system must be cleaned and painted as required to prevent atmospheric corrosion [rust]. The procedure followed for application and/or repair of brushed or rolled coating is B31Q task number 0991 with related procedures numbered 0141, 0171 and 0191. The procedure followed for application and/or repair of wrapped external coating is B31Q task number 1011 with related procedure number 0151.

The City must inspect and evaluate each pipeline or portion of the pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: - Other than a Service Line: At least once every 3 calendar years, but with intervals not exceeding 39 months. ·If atmospheric corrosion is found on a service line during the most recent inspection, then the next inspection of that pipeline or portion of pipeline must be within 3 calendar years, but with intervals not exceeding 39 months."

During this inspection(#JJ22-016) Staff noted that the Operators documentation for their CY2018 leak survey indicated that there were multiple locations which had been identified as having moderate atmospheric corrosion; however, the Operator had no documentation which indicated that any of these deficiencies had been remediated as required by §192.481(c) and their O & M procedures.

Staff also observed, at the Highway 129 N. regulator station, numerous places on the pipe with possible pitting, and it appeared that the pipe had not been painted nor properly taken care of for a while. The inlet pipe wrapping was found approximately 2-inches below the ground line. Also, Staff found numerous locations throughout the system where meter sets are in need of maintenance, cleaning and painting.

Staff also observed that the City of Ocilla'a O&M Manual makes references to the City of Andersonville.

PROBABLE VIOLATION: The City of Ocilla failed to remediate atmospheric corrosion which was identified on their system as required by §192.481(c) and their Operations and Maintenance Procedures Manual."

Staff proposed a civil penalty of $2,500.00 for this probable violation.

FIRST OPERATOR RESPONSE: On July 27, 2023 the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023), Staff verified that the Operator has remediated the atmospheric conditions on 129 N regulator station. The work on the Station has been completed.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time."

SECOND OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

SECOND FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

17. In regard to the Probable Violation of 49CFR, §192.605(b)(2) / §192.479 which was cited in Inspection Number (JJ22-016); in that inspection Staff stated:

"COMMENTS: Under §192.479 each operator must clean and coat each pipeline or portion of pipeline that is exposed to the atmosphere, and the coating material they use must be suitable for the prevention of atmospheric corrosion.

On page 79 of the City of Ocilla operations and Maintenance manual it states:
"Each above ground portion of the natural gas system that is exposed to the atmosphere must be cleaned and coated or jacketed with a material that is suitable for the prevention of atmosphere corrosion. All new bare metallic installations will be coated or jacketed as soon as possible after installation for the prevention of atmospheric corrosion.

Application or repair of coating defects should follow the procedure for application and repair of brushed or rolled coatings and is B31Q task number 0991 with related procedures numbered 0141, 0171 and 0191.

The procedure followed for application and/or repair of wrapped external coating is B31Q task number 1011 with related procedure number 0151."

In the General section of the Operator OQ Procedure #1011 - External Coating Application & Repair – Wrapped, it states: "Apply the wrap using a slight tension in a spiral configuration with sufficient overlapping of the wrap to ensure proper coverage taking care to minimize wrinkling of the wrap."

During this inspection (#JJ22-016), Staff located at the LaSalle Detention Center a 4" pipe that feeds the meter set had been wrapped so that water could infiltrate the wraps and migrate under the wrap to the riser.

PROBABLE VIOLATION: The City of Ocilla failed to follow their procedures to properly apply protective wrap to exposed piping."

OPERATORS FIRST RESPONSE: On July 27, 2023 the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023), Staff reviewed the operators work order and found that the LaSalle Detention Center 4" pipe that feeds the meter set has been cleaned and rewrapped so that water could not infiltrate the wraps and migrate under the wrap to the riser.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation, therefore Staff determined that this violation could not be cleared at this time."

SECOND OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

SECOND FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

18. In regard to the Probable Violation of 49CFR, §192.613(a) which was cited in Inspection Number JJ22-016; in that inspection Staff stated:

"COMMENTS: In the City of Ocilla Operations & Maintenance Manual procedure for Continuing Surveillance, which starts on page 92, it states:

"As a means of maintaining the integrity of the gas system, continuing surveillance through the analysis of completed inspection and maintenance records, daily operating reports and other records shall be on going.

Continuing surveillance will be conducted so as to identify any system facilities experiencing abnormal or unusual operating and maintenance conditions. The Gas Superintendent or his designee will complete the "Continuing Surveillance Report Form" and keep this record for a minimum of five (5) years.

All segments of pipeline found to be in an unsatisfactory condition will be repaired or replaced as soon as practical. If the condition presents a hazard, the repair or replacement will be accomplished immediately. The Gas Superintendent will prepare plans and programs for upgrading and reconditioning and for phasing out facilities that cannot be reconditioned. If additional support is needed, the Gas Superintendent will contract with an experienced outside firm to make a study to determine what changes are required."

During this inspection (#JJ22-016), Staff identified an exposed pipe laying on the drive thru at the Ocilla Pharmacy parking lot. Staff identified this location because it was noted on the Operators leak survey report for this address in 2017. NOTE: Staff had the City of Ocilla remove this pipe from the main and the parking lot before we left.

PROBABLE VIOLATION: The City of Ocilla failed to ensure that all segments of pipeline found to be in an unsatisfactory condition were repaired or replaced as soon as practical, as required by their Operations and Maintenance Procedures."

Staff proposed a civil penalty of $2,500.00 for this probable violation.

OPERATORS FIRST RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023) Staff reviewed the Operators work order and confirmed that the pipeline had been removed from the driveway of the Ocilla Pharmacy parking lot.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time."

SECOND OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best

efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

SECOND FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

19. In regard to the Probable Violation of 49CFR, §192.703(c) which was cited in Inspection Number JJ22-016; in that inspection Staff stated:

"COMMENTS: On Page 114 of the City of Ocilla's Operations and Procedures Manual it states:

"The City will not operate any segment of its pipeline, unless it is maintained in accordance with this section. Any segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service. The procedure followed by the Gas Superintendent, to measure and characterize mechanical damage to installed pipe and components is B31Q task number 0211 with related procedures 0151, 0201, 0601, 0611, 0621, 0631, 0801-0811 and 1071. Hazardous leaks must be repaired promptly according to their classification."

Appendix E of the Operator's O&M is the leak grading criteria. A Grade 1 leak is a "leak that represents an existing or probable hazard to persons or property and requires immediate repair or continuous action until the conditions are no longer hazardous.

During this inspection Staff examined the City of Ocilla Leak surveys and found that on November 16, 2019 the Operator found a Grade 1 leak at 813 East Tenth Street; however, this leak was not repaired until June 15, 2021.

Staff also found that the Operators documentation failed to properly identify the location of leaks that they failed to address prior to the next leak survey; for example:

- *In August 2017- identified a class 3 leak at Cherry St. N –Old McDonalds Appliances aka Chicken delight-N. Irwin.*
    - *In August 2018, the leak survey identified a class 2 leak at Cherry St. N –Old McDonalds Appliances aka Chicken delight-N. Irwin and a class 2 leak at 3rd St East- Old Precision Homes.*
    - *In November 2019, the leak survey identified a class 2 leak at Cherry St. N – Old McDonalds Appliances aka Chicken delight-N. Irwin, a class 2 leak at 3rd St East- Old Precision Homes.*
- *In August 2017- identified a class 2 leak at Old pressure chart on LAX hwy.*

- *In August 2021- identified a class 3 leak at Old pressure chart on LAX hwy.*

At the time of this inspection (JJ22-016) March 2022- No remedial measures have been taken to correct these leaks.

PROBABLE VIOLATION: The City of Ocilla failed to ensure that a hazardous leak was repaired promptly as required by §192.703(c) and their O&M Procedures."

Staff proposed a civil penalty of $2,500.00 for this probable violation.

OPERATORS FIRST RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023), Staff reviewed The City of Ocilla's work orders and photographs to determined that remedial measures have been taken to correct the leaks.

While the Operator has taken some actions to address this issue, they have not provided any meaningful written response to address the violation or the proposed penalty, therefore Staff determined that this violation could not be cleared at this time."

SECOND OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

SECOND FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

20. In regard to the Probable Violation of 49CFR, §192.723(b) which was cited in Inspection Number JJ22-016; in that inspection Staff stated:

"COMMENTS: In the City of Ocilla O&M Procedures Manual, on Page 115 it states:

"The Ocilla Gas Superintendent, or his designee, will perform all natural gas leakage surveys. Electronic leak detection equipment must be used to perform all natural gas leakage surveys, including tests of the atmosphere in gas, electric, telephone, sewer and water system manholes. Tests of the atmosphere in the business districts must be conducted at intervals not exceeding fifteen (15) months, but at least once each calendar year. All leak surveys will be the walking foot patrol type. All natural gas leakage surveys will be made by experienced personnel who have been specifically trained in the procedures to be employed during such operations.

Vegetation surveys are not acceptable. The procedure followed for a walking gas leak survey is B31Q task number 1261 with related procedures 1231 and 1241. Consideration must be given to increased frequency for leakage surveys based on the particular circumstances and conditions existing, but leakage surveys must be conducted outside business districts at intervals not exceeding five (5) years. All leaks detected in the Ocilla natural gas system will be graded using the criteria in Appendix D."

During this inspection (#JJ22-016), Staff identified multiple locations inside business district that have not been surveyed within the one-year timeframes. For example, 1- Irwin Manufacturing (business district) – not surveyed November 2019, surveyed in October 2020 and not surveyed on the November 2021. Still not surveyed as of this inspection March 2022.

Staff also identified multiple locations outside business district that have not been surveyed within the five-year timeframes. Examples of locations: - 1007 N. Union St., 1003 N. Union St, and 700 Frank Rd. (non-business districts) were not surveyed 2017, 2018, 2019 2020, nor 2021 surveys. Still not surveyed as of this inspection March 2022.

PROBABLE VIOLATION: The City of Ocilla failed to conduct leakage surveys inside business districts, and outside business districts as required by 49CFR, §192.723(b) and their O&M Procedures."

Staff proposed a civil penalty of $2,500.00 for this probable violation.

OPERATORS FIRST RESPONSE: On July 27, 2023, the Commission received a response to Inspection Numbers JJ22-016, JJ22-017, JJ22-015 which was dated February 22, 2023. In their response letter the City of Ocilla failed to address any specific outstanding violations and requested a six-month extension to assess their situation.

FIRST FOLLOW-UP INSPECTION: From June 26-29, 2023, Staff conducted a follow-up inspection of the City of Ocilla Gas System's previously existing probable violations. (Ref. Inspection Number JJ23-023) In that inspection Staff stated:

"During this inspection (JJ23-023) Operator stated that they will be doing a complete leak system survey by October 31, 2023."

SECOND OPERATOR RESPONSE: In their response to Inspection Number JJ23-023, dated May 13, 2024, the City of Ocilla stated:

"The City of Ocilla is in receipt of the Inspection results from your Inspection JJ23-023. On June 22, 2023, Mr. Joe Jones performed a follow up inspection. The City of Ocilla has had the untimely passing of our mayor after this inspection. We have elected a new Mayor, Mr. Melvin D. Harper. This report was left on the desk of the City Clerk who was let go by the Council around the time the Inspection letter arrived. Once this report was found we started to work on a response letter for you. We know response letters in the past have been a big issue of not being done. We want to get this system corrected and running to the best efficiency. This means keeping all paperwork and responding to PSC Inspections in a timely manner. We look forward to working with you on getting these violations resolved and getting our community into compliance. Speaking with our Public Works Director and our Consultants we feel some of the violations could be cleared of our system at this time. We would like to set an informal meeting with you to discuss best avenues to go, to get these violations taken care of and to help us operate at an efficient level"

SECOND FOLLOW-UP INSPECTION: In conjunction with this follow-up inspection (JJ25-050), Staff conducted an informal conference with the Mayor of Ocilla on August 11, 2025, to discuss the Operator's existing violations and outstanding proposed civil penalties. During the conference, Staff advised the Operator that, due to Ocilla's failure to comply with Commission Rule 515-9-3-.09—specifically, the requirement to submit either a written statement to the Pipeline Safety Director confirming that corrective measures have achieved compliance, or a written plan of action outlining the corrective measures to be taken and the anticipated timeline for compliance—Staff cannot recommend clearing the cited violation at this time.

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

While on site, Staff conducted three Operator Qualification Protocol 9 field verification inspections to ensure that covered task(s) were being performed in accordance with appropriate operator-approved procedures, that the procedures were present at the job site, and that the individuals performing the observed covered task(s) were adhering to the operator-approved procedures as written.

Wayne Coney – City of Ocilla Gas Tech Employee Performed:
1. Locate Underground Pipelines– Task #1291 Qualified Trough 4/27/2026.
2. Performed Outside Gas Leak Investigation – Task 1241, Qualified Through 6/11/2026
3. Performed Inside Gas Leak Investigation– Task #1231, Qualified Through 6/11/2026

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

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 Ocilla

Informal Conference Requested: Yes ☐ No ☐

Docket Number: 37074

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 Ocilla Gas Department	)	**DOCKET NO. 37074**
	)	
	)	
	)	

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

* Melvin D. Harper II, Mayor
City of Ocilla Gas Department
P. O. Box 626
113 North Erwin Street
Ocilla, GA 31774
mayor@cityofocillaga.net

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

Respectfully Submitted this _____ day of November 2026:

Morgan Mitchell

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