

GMA Gas Section /
Natural Gas Association of Georgia
Management Conference
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Countywide Safety Plan Rule

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Why should I listen
to this?

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- Countywide Safety Plan (CWSP) Rule may affect:
 - Operations and Maintenance
 - Emergency Response
 - System Planning / Engineering
 - Marketing and Sales
 - Customer Service
 - Legal

99 Reasons

- CWSP template says:
 - “Shall” – 73 times
 - “Shall not” – 2 times
 - “Must” – 3 times
 - “May” – 21 times

GPSC Enforcement

- Inspection Form (newly released)
 - Section 1 – Plan Availability & Document Control
 - Section 2 – Contact Rosters & Emergency Liaison
 - Section 3 – Mapping, Boundaries & Proximity Monitoring
 - Section 4 – Emergency Protocols & Operator Qualification
 - Section 5 – Excavation, GC-1 Tickets & Boundary Integrity
 - Section 6 – Emergency Training & Records
 - Georgia Pipeline Emergency Response Initiative

- 27 Questions

CWSP High Level Description

- Each county in which there is more than one natural gas Distribution Operator must have a Countywide Safety Plan
 - Required elements of Plan are described in the Rule
- Under the following conditions, the CWSP must have Boundaries separating Distribution Systems:
 - Distribution facilities within 5 miles (Overlap Area)
 - Request by any Distribution System Operator in the county
 - Request by GPSC Staff
- CWSP must be approved or amended before facilities can be constructed or extended beyond an approved Boundary
- When Operators agree to changes, the Commission typically approves their proposal. If Operators cannot agree, the Commission decides whether/how to change.

CWSP Statistics

- Total CWSPs – 62 (145 of 159 GA counties have gas facilities)
 - Muni + AGL – 41
 - Muni only – 15
 - Muni + AGL + Liberty – 3 (Barrow, Hall & Oconee)
 - AGL + Liberty – 2 (Meriwether & Talbot)
 - Muni + Liberty – 1 (Harris)
- Most parties to a Plan – 8 (Walton w/ 7 Munis + AGL)
- Affected Munis – 61 of 78
- No Boundaries – 4 (Burke, Dooly, Randolph, Stewart)
- First & Last Approved – Coweta 2009, Walton 2024

Current CWSPs

Baldwin	Dodge	Houston	Pulaski
Banks	Dooly	Irwin	Randolph
Barrow	Douglas	Jackson	Rockdale
Bartow	Effingham	Jefferson	Screven
Berrien	Elbert	Jones	Stewart
Bibb	Floyd	Laurens	Sumter
Bleckley	Franklin	Madison	Talbot
Bryan	Glascock	McDuffie	Taliaferro
Burke	Gordon	Meriwether	Troup
Chattooga	Gwinnett	Mitchell	Twiggs
Clarke	Habersham	Monroe	Walker
Cobb	Hall	Morgan	Walton
Colquitt	Haralson	Newton	Warren
Coweta	Harris	Oconee	Washington
Crawford	Hart	Oglethorpe	Wilkinson
Decatur		Peach	

CWSP Amendments In Progress

- Gwinnett (2) – filed 10/2/25 and 8/7/26
- Oconee – filed 4/23/26
- Troup – filed 8/8/25
- Walton – filed 6/10/26

- Barrow – to be filed soon

CWSP Rules

- Officially: Georgia Public Service Commission Regulation 515-9-7 Gas Safety in Georgia Counties
- Includes:
 - .01 Countywide Gas Safety Plan
 - Adopted 2008, Effective 2009
 - .02 Minimum Procedures for Handling Areas of Natural Gas Emergencies Occurring on the Facilities of Another Operator
 - Adopted 2010, Effective 2011
 - .03 Identification and Disclosure of Landfill Gas Lines
 - Adopted and Effective 2011
 - Not limited to CWSP

515-9-7 Gas Safety in Georgia Counties

.01 Countywide Gas Safety Plan

- (1) Definitions
- (2) Requirement To Establish and Comply ...
- (3) Required Elements ...
- (4) Amendments ...
- (5) Incorporation ... into Operator Manuals
- (6) Operators' Duties to Train ...
- (7) Operators Duties to other Operators, Public Officials, and
Emergency Responders
- (8) Safety Plan Does Not Constitute Commission Certification
- (9) Review and Updating ...

515-9-7 Gas Safety in Georgia Counties

.02 Minimum Procedures for Handling Areas of Natural Gas Emergencies Occurring on the Facilities of Another Operator

- (1) Purpose
- (2) Definitions
- (3) Obligation of the Responding Operator
- (4) Procedures for the Responding Operator when responding to an Emergency on the Facilities of the Affected Operator
- (5) No Duty Created
- (6) Compliance with 49 C.F.R §192.615 and Acceptance of Emergency Procedures
- (7) Points of Contact

CWSP Template

- Developed by Operators and GPSC Staff
- Addresses .01 & .02 of CWSP Rule
- Has evolved over time
- Approved Plans vary slightly based on the then-current version of the template
- The differences are usually limited to formatting, but some material differences exist
- New and amended Plans are prepared in most recent template

CWSP Template “Attachments”

- Attachment A – Countywide Safety Plan: _____ County
 - Fourteen Sections
- Attachment B – Gas System Operators & Responsible Points of Contact
- Attachment B-1 – Public Official & Emergency Responders
- Attachments B-2 thru B-x – Operators’ Local Points of Contact for Emergencies
- Attachment C – Plan Maps
- Attachment D – Customer Transfers
- Attachment E – Record of Countywide Natural Gas Safety Plan Meeting

Attachment A – Countywide Safety Plan: _____ County

- SECTION ONE – Definitions
- SECTION TWO – Description of Parties to the Plan
- SECTION THREE – Plan Boundaries
- SECTION FOUR – Notification and Map Updating Procedures
- SECTION FIVE – Procedures Involving Facilities of Another Operator
- SECTION SIX – Transfer of Customers
- SECTION SEVEN – Procedure for Minimizing and Managing Safety Risks
- SECTION EIGHT – Incorporation of Natural Gas Safety Plan into Operation and Emergency Manuals
- SECTION NINE – Training on Emergency Procedures
- SECTION TEN – Procedure for Establishing and Maintaining Liaison
- SECTION ELEVEN – Review and Updating Gas Safety Plan
- SECTION TWELVE – Plan Rationale and Assumptions
- SECTION THIRTEEN – Requests for Service Outside of Boundary Area
- SECTION FOURTEEN – Prohibition on Construction or Installation in Conflict with the Plan

Attachment A – Countywide Safety Plan: _____ County

General Awareness

- SECTION ONE – Definitions
- SECTION TWO – Description of Parties to the Plan
- SECTION THREE – Plan Boundaries
- SECTION FOUR – Notification and Map Updating Procedures
- SECTION FIVE – Procedures Involving Facilities of Another Operator
- SECTION SIX – Transfer of Customers
- SECTION SEVEN – Procedure for Minimizing and Managing Safety Risks
- SECTION EIGHT – Incorporation of Natural Gas Safety Plan into Operation and Emergency Manuals
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Plan Template

Attachments B thru E

- Attachment B – Identifies Responsible Points of Contact for each Party to the Plan*
 - *Not in early versions of Plan template
- Attachment B-1 – Identifies Public Officials & Emergency Responders Contacts within County
- Attachments B-2 thru B-x (depending on the number of Operators that are Parties to the Plan) – Identifies Local Points of Contact for Emergencies for each Party to the Plan.

Note – Attachments B thru B-x must be updated at least annually.

- Attachment C – Provides or describes map(s) for the Plan – Typically a description of separate map(s) showing Boundaries, Areas of Joint Response, and Pipeline-Only Rights-of-Way
- Attachment D – Provides a list of Customer Transfers (if any) between Parties
- Attachment E – Provides a form for recording CWSP meetings between the Parties

Plan Template

Attachment C (Map)

- Sources, methods, & media vary
 - From hand-drawn to GIS
 - GDOT county maps to digital base maps with property parcels and other features
 - AGL prepared digital maps for all counties in which it is a party to the CWSP

Plan Template

Attachment C (Map)

Boundaries

- Use “natural and artificial boundaries”
 - e.g., waterways, railroads, divided/interstate highways, interstate pipelines, and electric transmission lines
 - Also, roads and property lines where necessary
- Written Descriptions in Section Three
 - Earlier Plans using previous templates varied
 - Tax Map Parcel Numbers, Legal Descriptions, etc.
 - Latitude/Longitude references now included
- In case of discrepancy, map governs

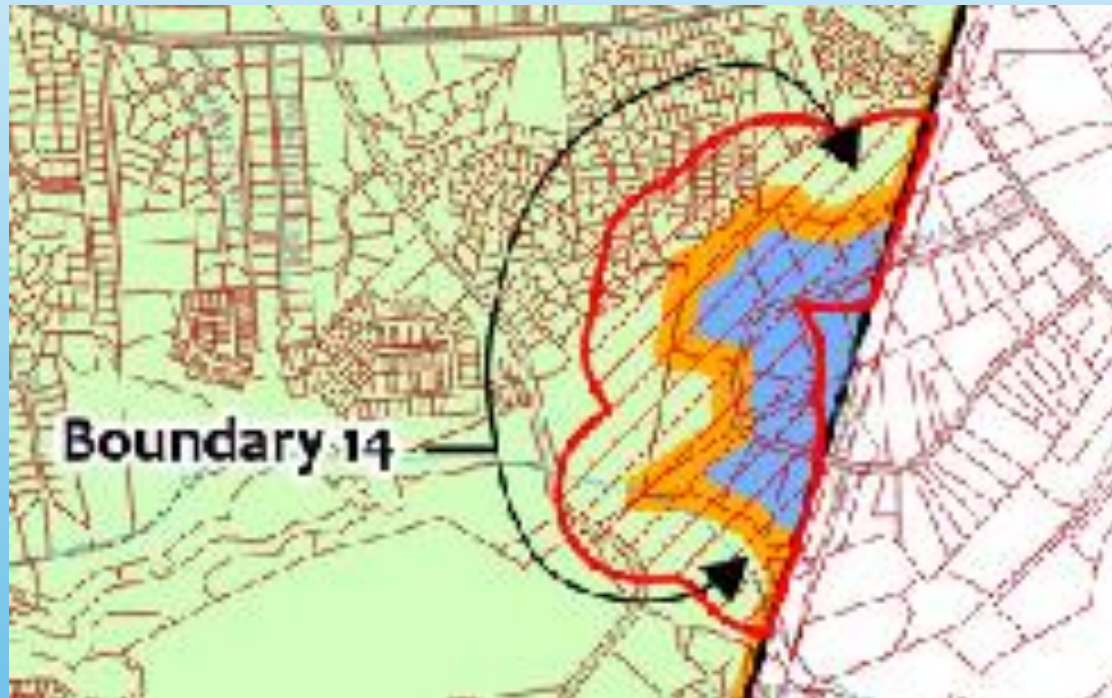
Plan Template

Attachment C (Map)

Boundary-like Features

- Area of Close Proximity and Joint Response (AJR)
 - Any point along a boundary where any facilities of two or more Operators are within 220 yards of the boundary.
- Pipeline-Only Right of Way (POROW)
 - Facilities within another Operator's territory without providing service
- Limited Pipeline-Only Right of Way (LPOROW)
 - Facilities within another Operator's territory providing service into first Operator's territory

Boundary Example



Boundary Description Example

- Boundary 14 is between the City of Buford and the City of Winder in the northeastern part of Gwinnett County starting at the Gwinnett/Barrow County Line at approximately Latitude: 34.060298, Longitude: -83.844840. Boundary 14 extends generally northwest along the back property lines of parcels fronting the south side of Thomas Drive to a property parcel corner at approximately Latitude: 34.061859, Longitude: -83.849210. Boundary 14 extends northeast along a property parcel line to the southwestern right-of-way of Thomas Drive at approximately Latitude: 34.063127, Longitude: -83.846801. Boundary 14 extends generally north along the west right-of-way of Thomas Drive to a property parcel corner at approximately Latitude: 34.064501, Longitude: -83.846738. Boundary 14 extends west along a property parcel line to a property parcel corner at approximately Latitude: 34.064808, -83.848387. Boundary 14 extends north and northeast along the back property lines of parcels fronting on the west and northwest side of Thomas Drive to its ending point at the Gwinnett/Barrow County Line at approximately Latitude: 34.068104, Longitude: -83.841703.

Requests for Service Outside of Boundary Area (Section Thirteen)

- Operators receiving service requests in areas they are unable to serve under Plan boundaries will:
 - Direct the customer to the Operator that can serve, or
 - Promptly petition to amend the Plan in order to provide service
- Any Operator may petition the Commission to amend the Plan
 - Provide notice to every Operator in the county
 - Work in good faith to file a jointly proposed amendment
 - If unable to agree within 30 days, Operator seeking to amend shall file a proposed amendment with the Commission

Amendment Steps

(Consensus Amendment with Staff & GPSC Agreement)

- Provide notice of proposal to amend
- Work in good faith to jointly file proposed amendment
- File proposed revised Plan and Map
- Review by Pipeline Safety Staff and Gas Staff
- Sign Consent Agreement
- Consideration by GPSC Energy Committee
- Consideration by GPSC
- Final Order

Related Regulation

Certificates of Public Convenience & Necessity

- Officially: Georgia Public Service Commission
Regulation 515-7-1 Gas Companies' Certificates
- Adopted in 1956
- Some provisions apply differently between Municipal Systems and Investor-Owned Operators
- Addresses Home County status for Municipals
- Includes 80-Foot Rule

Related Regulation

Certificates of Public Convenience & Necessity

- All (both) investor-owned Operators must have a Certificate for their facilities in each county
- Any publicly-owned Operator that has used revenue bonds to buy, construct, extend, operator or maintain any portion of its gas pipeline system must have a Certificate(s) for the portion of its systems that is outside its Home County/Counties
 - Certificate not required for municipal facilities in a Home County
- Two types of Certificates – “Distribution”, which allows retail service, and “Pipe Line,” which does not allow retail service (with possible exceptions)
- CWSP Boundaries and Certificate boundaries must align
 - Certificate must be established or amended upon approval of a CWSP

Related Regulation

Certificates of Public Convenience & Necessity

➤ Home County Status

- A county in which a municipality's city limits lie
- A municipal Operator can have multiple Home Counties, e.g., Royston has 3 – Franklin, Hart, and Madison

➤ 80-Foot Rule

- Prohibits Operators from installing gas pipeline facilities within 80 feet of another Operator's facilities unless waived
- Commission may waive this prohibition “for good cause shown and upon credible testimony that such crossing or closure within 80 feet is safe and affords no significant danger to the public safety and welfare”
- Waivers are now added to applicable CWSP Docket(s)

Major Ongoing Requirements

- Annual map exchange & review
- Annual liaison including other Operators
- Procedures for calls to facilities of other Operators
- Additional pipeline markers and patrolling in AJRs
- Communications with other Operators

Major Ongoing Requirements (continued)

- Incorporate CWSP into O&M and EP
- Initial and supplemental training
- 5-year reapproval
- Requests for service outside Boundary
- Annual update of Attachments B thru B-X

Routine Activities

If you see something, say something

- Use current information – CWSPs change
- Advise appropriate personnel as soon as you suspect that a CWSP issue exists
- Start early - Consensus amendment of a CWSP can easily take 6 months after filing and contested amendment much longer

Proposed Revisions in Discussion

➤ CWSP Reapproval Requirement

- Current – Commission approval every five years
- Proposed – Notice by all parties to Plan

➤ 80-Foot Rule

- Current - Commission waiver required
- Proposed – Notice by affected Operators, if consensus

QUESTIONS?