

Tennessee Public Utility Commission



Title VI

Compliance Report and Implementation Plan FY 2024-2025

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OVERVIEW:

TENNESSEE PUBLIC UTILITY COMMISSION

The mission of the Tennessee Public Utility Commission is to provide regulatory oversight of Tennessee's privately held public utility companies. The Commission also has the authority to enforce state and federal safety requirements for Tennessee's intrastate gas pipelines and all natural gas distribution systems within the state, including private systems, utility districts, municipalities, and master meters.

Leadership of the Commission is appointed by the Governor, Lt. Governor and Speaker of the House and is comprised of seven Commissioners and an Executive Director. Commissioner David Jones serves as agency Chair with Commissioner John Hie as Vice Chairman, along with Commissioners Robin Bennett, David Crowell, Clay Good, Herbert Hilliard, and Kenneth Hill. Additionally, Mr. Earl Taylor serves as the Commission's Executive Director as the appointee of the Governor, Lt. Governor, and Speaker of the House. An organizational chart of the agency is included as **Attachment A**.

The non-discrimination policy of the Commission states there shall be no discrimination on the basis of race, color, age, national origin, religion, disability, creed, or sex. The leadership of the Commission, by example and exercise of their authority, will continue to establish an atmosphere free of discrimination on the basis of religion, national origin, disability, sex, age, race, creed, or color.

RESPONSIBLE OFFICIALS

Responsibility for the Commission's implementation, coordination, and monitoring of Title VI of the Civil Rights Act of 1964 will rest with the Chairman's office. The Chairman's office will be responsible for appointing a member of the staff as the Title VI Coordinator and delegating all authority necessary to ensure implementation and compliance.

Contact information: Tennessee Public Utility Commission, 502 Deaderick Street, 4th floor, Nashville, TN 37243

Greg Mitchell

Greg Mitchell, Title VI Coordinator
Greg.Mitchell@tn.gov



David Jones, Chairman
David.Jones@tn.gov

DEFINITIONS

Complainant:	A person, group, or company that makes a complaint, as in a legal action.
Direct Sale:	A pipeline that transports gas to a large volume customer such as a factory or power plant. This pipeline is upstream from a distribution center or directly off of a transmission line.
GPSD:	Gas Pipeline Safety Division
Intrastate Pipeline:	An inter-connected system of pipes that run within the specified boundaries of a state.
LEP:	Limited English Proficiency
Lifeline:	An assistance program that pays for a portion of a consumer's telephone bill.
Master Meter:	A pipeline system for distributing gas within, but not limited to, a definable area, such as a mobile home park, housing project, or apartment complex, where the operator purchases metered gas from an outside source for resale through a gas distribution pipeline system. The gas distribution pipeline system supplies the ultimate consumer who either purchases the gas directly through a meter or by other means, such as by rents.
Municipal System:	A utility system operated by a city or county government.
PHMSA:	Pipeline and Hazardous Material Safety Administration
Private System:	A utility system operated by a group of private investors or a corporation.
TRC:	Tennessee Relay Center
USDOT:	United State Department of Transportation

NON-DISCRIMINATION POLICY

The Tennessee Public Utility Commission affirms its intention to comply with Title VI of the Civil Rights Act of 1964, which states that:

No person in the United States shall on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.

Further, the Tennessee Public Utility Commission shall make available to the Tennessee Department of Human Resources (DOHR) or any other recipients where applicable, its compliance report to be reviewed by the aforementioned bodies upon request.

ORGANIZATION OF THE CIVIL RIGHTS OFFICE TITLE VI COORDINATOR

The Title VI coordinator for the Tennessee Public Utility Commission is Greg Mitchell. The coordinator is responsible for resolving findings of non-compliance, resolutions of complaints, and assisting in any other areas of support needed. The Title VI coordinator has the primary responsibility for policy development, oversight, coordination of training activities, and the resolution of all Title VI compliance matters.

In addition to his Title VI duties, Mr. Mitchell serves as the Public Information Officer and Telecommunication Devices Access Program outreach manager in the Commission's Consumer Services Division. Mr. Mitchell can be reached at (615) 770-6883 or by email at greg.mitchell@tn.gov.

Duties of the Title VI coordinator includes:

- 1) Preparing the Commission's Title VI implementation plan and plan updates.
- 2) Establishing an appropriate Limited English Proficiency (LEP) policy.
- 3) Verifying that all aspects of the Title VI plan are being implemented.
- 4) Reviewing complaint reports and other documentation to determine if additional compliance efforts are needed.
- 5) Consulting with the Commission's Directors to resolve complaints and findings of non-compliance with Title VI.
- 6) Serving as a liaison with other state personnel on Title VI issues and concerns.
- 7) Functioning as an information resource person to help the Commission comply with applicable statutes and regulations.

DISCRIMINATORY PRACTICES

Statement of Title VI Policy

The Tennessee Public Utility Commission affirms its intention to comply with Title VI of the Civil Rights Act of 1964, which states that:

No person in the United States shall on the ground of race, color, or national origin, be excluded from participation in, be denied benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.

Therefore, the Tennessee Public Utility Commission acknowledges that Title VI of the Civil Rights Act of 1964:

- Prohibits entities from denying services or benefits based on race, color, or national origin.
- Prohibits providing services or benefits to some individuals that are different or inferior (either in quantity or quality) to those provided to others.
- Prohibits segregation or separate treatment in any manner related to receiving services or benefits.
- Prohibits requiring different standards or conditions as prerequisites for serving individuals.
- Prohibits methods of administration which directly, or through contractual relationships, would defeat or substantially impair the accomplishment of effective nondiscrimination practices.
- Encourages the participation of minorities as members of planning or advisory bodies for programs receiving federal funds.
- Prohibits discriminatory activity in a facility built in whole or in part with federal funds.
- Requires information and services to be provided in languages other than in English when significant numbers of beneficiaries are of limited English speaking ability.
- Requires notification to the eligible population about applicable programs.
- Prohibits locating facilities in any way that would limit or impede access to a federally funded service or benefit.
- Requires assurance of nondiscrimination in purchasing.

The Commission upholds the principles of Title VI in its activities and there have been no situations in which such discriminatory practices have occurred in relation to the Commission's activities.

FEDERAL PROGRAMS OR ACTIVITIES

Gas Pipeline Safety Inspections

The Gas Pipeline Safety Division (“GPSD”) of the Commission utilizes a grant from the United States Department of Transportation (“USDOT”) Pipeline and Hazardous Materials Safety Administration (“PHMSA”) for the purpose of performing safety inspections of Tennessee’s natural gas pipelines and natural gas distribution operators. The GPSD monitors compliance with federal and state safety regulations pertaining to the operation and maintenance requirements of natural gas transmission pipes, valves, and other hardware, as well as drug testing standards for all natural gas distribution systems. The grant is established under, 49 U.S.C. Section 60101, *et seq.* Federal funding allocated for Commission gas pipeline inspections during the past year amounted to approximately \$1,168,009.

The Commission has safety jurisdiction over operators including private, municipal systems and utility districts, and over gas distribution companies including two liquefied natural gas facilities. In the past fiscal year, the GPSD performed over 500 inspections on gas pipeline operators under its mandate.

Below is an Excel breakdown by operator type of the systems subject to safety inspections performed by the Commission.

Federal Program: TPUC Gas Pipeline Inspections FY24-25	
Operator Type	Number Represented
Municipal Systems	70
Master Meter Operators	24
Utility Districts	24
Intrastate Transmission	14
Private Systems	6
Liquefied Natural Gas (LNG)	2
Gathering Natural Gas Line	2
Total	142
Federal Funding Allocated for Inspections:	\$1,168,009

*The 2024 Natural Gas certification is included as **Attachment B**.

Underground Utility Damage Prevention

The Tennessee Public Utility Commission utilizes a grant from the United States Department of Transportation (USDOT) Pipeline and Hazardous Materials Safety Administration (PHMSA). The purpose of the federal grant is to support the prevention of damage to Tennessee underground pipelines.

The Commission received two grants from PHMSA. The first is in the amount of \$86,299 and the second is in the amount of \$46,899. The combined total is \$133,198. The documents referencing the federal grant are under **Attachment C**.

FFA Amount	FFA Agency
\$1,168,009	(PHMSA) Pipeline and Hazardous Materials Safety Administration
\$86,299	(PHMSA) Pipeline and Hazardous Materials Safety Administration
\$46,899	(PHMSA) Pipeline and Hazardous Materials Safety Administration
	FFA Purpose
\$1,168,009	To ensure compliance with federal and state safety regulations pertaining to the operation and maintenance of underground natural gas transmission pipes, valves, and other hardware across Tennessee.
\$86,299	Designated for the prevention of damage to underground pipelines.
\$46,899	Pipeline Safety One Call grant. One Call is a national 811 dialing service that locates underground utilities.
	No equipment, federal personnel, land, or loans are associated with the FFA grants

THE COMMISSION’S POLICY ON NON-DISCRIMINATION IN OTHER NON-FEDERAL PROGRAMS

The Commission receives no federal funds to support the operation of the following programs. Nevertheless, the Commission has taken steps to ensure that discrimination does not occur in the operation of these programs.

Tennessee Relay Center

As a service to Tennessee's deaf, deaf-blind, hard-of-hearing, and hearing and speech-impaired community, the Commission and Hamilton Relay entered into a contract for the provision of relay services and operation of the Tennessee Relay Center in Tennessee. Regulated by the Commission, Tennessee Relay Service (TRC) provides free, statewide assisted telephone service to those with speech, hearing, and visual impairments by linking conversations between people who use text telephones (TTY's) or telebraille (TB) devices and people who use standard phones.

The contract embodies the Commission’s policy of non-discrimination. Section D.7 assures that “no person shall be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination in the performance of this contract or in the employment practices of the Contractor on the grounds of disability, age, race, color, religion, sex, national origin, or any other classification protected by Federal, Tennessee State constitutional, or statutory law. The Contractor shall, upon request, show proof of such nondiscrimination and shall post in conspicuous places, available to all employees and applicants, notices of nondiscrimination.” **The Commission does not receive Federal funds to operate the TRC.**

National Deaf Blind Equipment Distribution Program

The National Deaf Blind Equipment Distribution Program is an additional service to our deaf and blind community. The program provides assistive devices to enhance the communication abilities for Tennessee’s deaf and blind citizens. While not a federal grant, the program is a reimbursement program by the FCC to the Commission.

Recording of Commission hearings

By Tennessee statute, the Commission is required to maintain a record of all Commission hearings and conferences. These services are provided through a State of Tennessee-approved court reporting service. At the request of the Commission, a qualified court reporter provides a written transcript of the Commission’s hearings and conferences pursuant to all applicable rules and procedures of the Tennessee Public Utility Commission. **No federal funds are received or expended for court reporter services.**

DATA COLLECTION AND ANALYSIS

The Commission is comprised of 53 individuals performing various professional functions. As supplied by the Commission's Personnel Manager, a portion of the Commission's personnel are Executive Service and a portion are Preferred Service. The racial or national origin the staff consists of:

Racial and National Origin of Commission Staff	
Latino	1 (2%)
Asian	2 (4%)
Black	8 (16%)
White	40 (78%)
Total	51

Executive Service and Preferred Service Breakdown	
Executive Service	49 (96%)
Preferred Service	2 (4%)
Total	51

Racial and National Origin of Executive Service and Preferred Service Staff	
Executive Service (White)	40 (78%)
Executive Service (Black)	7 (15%)
Executive Service (Asian)	2 (5%)
Preferred Service (Latino)	1 (1%)
Preferred Service (Black)	1 (1%)
	51

TENNESSEE CENSUS DATA

According to 2020 Census, data for Tennessee shows that the five most populous incorporated places across the state are:

Tennessee's Five Most Populous Incorporated Areas	
Location	Population
Memphis	929,744
Nashville-Davidson	715,884
Knoxville	478,971
Chattanooga	366,207
Murfreesboro	341,486

All of Tennessee's counties saw their populations grow from the 2010 Census to the 2020 Census. The largest county in the state is Shelby, with a population of 929,744. The other counties in the top five include Davidson, with a population of 715,884; Knox, 478,971; Hamilton, 366,207; and Rutherford, 341,486. The state's racial make-up consists of:

Total population: 6,910,840 (Source: US Census Bureau)

Tennessee's Racial Breakdown	
Racial Group	Population
White	4,900,246
Black/African American	1,083,772
Persons of Hispanic or Latino origin	479,187
Asian	134,302
American Indian/Alaska Natives	15,539
Native Hawaiian or Pacific Islander	3,594
Some other race alone	23,977
Two or more races	270,223

The Commission's Gas Pipeline Safety Division (GPSD) of the utilizes a grant from the United States Department of Transportation (USDOT) Pipeline and Hazardous Materials Safety Administration (PHMSA) for the purpose of performing safety inspections of Tennessee's natural gas pipelines, valves, hardware, and natural gas distribution systems. This would include the inspection of private and municipal systems, utility districts, and gas distribution company pipelines including two liquefied natural gas facilities. Given the narrow scope of the duties of our inspectors as described above, no racial or ethnic data is available.

LIMITED ENGLISH PROFICIENCY (LEP)

Tennessee Public Utility Commission utilizes the translation services of Avaza Language Services to assist in translating communications with persons with LEP. Historically, the languages the Commission has encountered have been Spanish and Arabic, the majority of which are Spanish.

The Tennessee Public Utility Commission's LEP Policy is outlined in **ATTACHMENT D** within the Commission's 24-25 IP Plan.

During the fiscal year, the Commission received (4) LEP encounters. Of the encounters the Commission received, all (4) were from Spanish speaking persons. **ATTACHMENT H.**

Right to Transfer information: the Commission does not receive visitors who are in the LEP category into its offices. All LEP encounters occur through Avaza Language Services.

Tennessee Public Utility Commission takes the following steps to access Avaza Language Services:

1. Upon receiving the LEP call, the LEP person is placed on hold;
2. The Tennessee Public Utility Commission staff then contacts Avaza at 615-534-3405;
3. The Tennessee Public Utility Commission staff then presses 1 for Spanish or 2 for other languages;
4. The Tennessee Public Utility Commission staff provides Avaza with our agency Access code and Client ID number;
5. Tennessee Public Utility Commission staff briefs the Avaza interpreter on the nature of the call;
6. Tennessee Public Utility Commission staff conferences the interpreter with the LEP caller;
7. Calls are concluded by communicating "end of session";
8. All LEP/Avaza encounters are provided to the Title VI Coordinator by Tennessee Public Utility Commission staff.

The Commission documents that are translated in Spanish include the Telecommunications Devices Access Program (a non-Federal program).

Telecommunications Devices Access Programs (TDAP)

El Programa de Acceso a Dispositivos de Telecomunicaciones ("TDAP") se establece en el Capítulo 417 de las Actas Públicas de 1999 (el "ACT"). De conformidad con la Ley, el programa está diseñado para distribuir dispositivos de telecomunicaciones apropiados para que las personas con discapacidad puedan utilizar efectivamente el servicio telefónico básico. La Comisión de Servicios Públicos de Tennessee recibió la responsabilidad y la autoridad para implementar y administrar este programa.

Los dispositivos se emiten por orden de llegada. Sin embargo, hay ciertos calificadores que pueden permitir a las personas recibir dispositivos de forma prioritaria. Los solicitantes pueden consultar los requisitos mínimos de elegibilidad o consultar las reglas de la Comisión de Servicios Públicos de Tennessee, capítulo 1220-4-10 en TN SOS.

Requisitos mínimos de elegibilidad

- Los solicitantes deben ser residentes permanentes del estado de Tennessee.
- Los solicitantes deben tener una discapacidad tal que la persona no pueda usar el teléfono de manera efectiva sin el uso de un dispositivo de asistencia.
- Solo se otorgará un dispositivo de asistencia por hogar a través del TDAP. El Coordinador del programa puede determinar que se necesitan dos dispositivos diferentes en caso de que haya otra persona en el hogar con una necesidad diferente.
- Los solicitantes deben poder usar el dispositivo o aceptar la capacitación adecuada antes de emitir un dispositivo.
- Una vez que un solicitante recibe un dispositivo, el solicitante se hace responsable de las reparaciones necesarias. Los tiempos de reparación extendidos pueden calificar al solicitante para un reemplazo prestado hasta que se completen las reparaciones. El solicitante debe coordinar con el Coordinador del programa para este acuerdo.
- El solicitante seguirá siendo responsable de toda la facturación telefónica y de cualquier elemento periférico necesario para el dispositivo, es decir, papel, baterías, etc.

Solicitud

La Regla 1220-4-10 ha sido adoptada por la Autoridad y firmada por el Secretario de Estado y entrará en vigencia el 5 de febrero de 2000.

Se aceptan solicitudes. Por favor envíelo a:

Tennessee Public Utility Commission Title VI Limited English Proficiency (LEP) Policy

The Tennessee Public Utility Commission is committed to ensuring that Tennessee citizens with Limited English Proficiency (LEP) are provided with the means and opportunity to participate fully in the services and information that the Commission provides. As such, we set forth the following policy directives to maintain this standard.

- The **Tennessee Public Utility Commission** will take the necessary actions and steps to ensure that persons with LEP will have an equal opportunity and purposeful access to the information and services made available by the Commission.
- The **Tennessee Public Utility Commission** will endeavor to maintain an established means of communication to persons with LEP by means of an established language translation service provider.
- The translators, interpreters and other aids needed to comply with the **Tennessee Public Utility Commission's** policy will be offered free of charged to the LEP population being served.
- Such provided services will be made available through the use of bilingual translators, available to translate from a large number of foreign languages.
- **Tennessee Public Utility Commission** staff shall be provided with translation services contact information, such as service provider information cards and informational posters, and kept current on new updates to translation services provided and new languages offered.
- The **Tennessee Public Utility Commission** will maintain a record of LEP interactions that shall be available for review by the public upon request.
- Translations of conversations with LEP persons are facilitated through Avaza Translation Services via 3-way phone conversations and are not available to the **Tennessee Public Utility Commission** at the conclusion of such calls.
- Only numeric LEP encounters are kept by the **Tennessee Public Utility Commission** and not the specific languages encountered.
- The **Tennessee Public Utility Commission** on an ongoing basis will review, assess and revise these policies with respect to serving Tennessee consumers with LEP to ensure continued compliance with the Title VI law.

- Commission staff is advised to contact the agency's Title VI coordinator, Greg Mitchell, if additional LEP resources are needed.
- Language translation will be provided through the State of Tennessee's contract service provider, Avaza Language Service Corporation, or through another State of Tennessee approved vendor of such services.
- Language Translation Service Contact information: Avaza Translation Service, 5209 Linbar Drive, Suite 603, Nashville, TN 37211.

COMPLAINT PROCEDURES

Any person alleging discrimination based on race, color, or national origin has a right to file a complaint within a timeline of 180 days or 6 months of the alleged discrimination. At the complainant's discretion, the complaint can be filed with the appropriate federal agency, the Commission, or the Tennessee Department of Human Resources (DOHR). In addition, an investigative summary will be sent to the Tennessee Human Rights Commission prior to notifying the complainant.

Any person alleging discrimination based on race, color, or national origin has a right to file a complaint within 180 days of the alleged discrimination. At the complainant's discretion, the complaint can be filed with the appropriate federal agency, the Commission, or the Tennessee Human Rights Commission. Moreover, any such complaint filed with the Tennessee Public Utility Commission is subject to review by the Tennessee Department of Human Resources (DOHR) for applicability under Title VI of the Civil Rights Act of 1964. Tennessee Department of Human Resources (DOHR), Title VI Rule 1500-01-03-06 (1) & (2) requires the commencement of a Title VI investigation be reported to the Commission within ten days and a summary of its investigation to the Commission prior to notifying the complainant. These procedures comply with Tenn. Code Ann. § 4-21-905 (2005). These procedures comply with Tenn. Code Ann. § 4-21-905 (2005). **ATTACHMENT E**

Receipt of Complaints

All complaints, written or verbal, are accepted. In the event that a complainant sets forth allegations verbally and refuses to reduce such allegations to writing, the person to whom the complaint is made will reduce the elements of the complaint to writing. It will not be necessary to know the identity of the complainant as long as the information is sufficient to determine the applicability of the complaint to the programs of the Commission and indicates the possibility of a violation. **ATTACHMENT F**

Elements of a Complaint

The Commission will obtain the following information from the complainant:

- 1) Name (optional), address and telephone number.
- 2) The location and name of the entity delivering the service.
- 3) The nature of the incident that led the complainant to feel discrimination was a factor.
- 4) The basis of the complaint, i.e. race, color, or national origin.
- 5) Names, addresses, and telephone numbers of individuals who may have knowledge of the event.
- 6) The date(s) on which the alleged discriminatory event(s) occurred.

Complaint Resolution

- 1) Complaints will be reviewed by the Commission's Title VI coordinator. The coordinator will determine whether the complaint will be referred to an appropriate federal agency or will be investigated by the Commission.
- 2) Complaints will be reported to the Tennessee Department of Human Resources (DOHR) within 10 days.
- 3) Complaints to be investigated by the Commission will be handled within 90 days of receipt.
- 4) A letter will be sent to acknowledge receipt of the complaint and to request a time and date the complainant can be reached by telephone to discuss the complaint.
- 5) Complainants will not be parties to the Title VI investigation and will not enjoy a status different from other persons interviewed.
- 6) A preliminary review will be conducted on all complaints to substantiate or refute the allegations.
- 7) If the preliminary review indicates that there may be a problem, then a full complaint investigation will be initiated. A letter will be sent to the complainant explaining that an investigation will ensue, and that the complainant's assistance will be needed in the future.
- 8) If appropriate, the Commission will coordinate with other agencies on matters involving interdepartmental issues and reviews.
- 9) If the allegations are not substantiated, a letter containing a description of the investigated allegations, the scope of the investigation, the facts learned, and a closing statement summarizing the basis on which the determination was made will be sent to the complainant. The complainant will be advised of his/her right to file a complaint with other applicable governmental entities if dissatisfied with the resolution of the complaint.
- 10) If the complaint is substantiated, a letter will be sent notifying the complainant that the complaint has been investigated and substantiated and that efforts are being made to correct the deficiency.

During the 2024-2025 fiscal year there were no Title VI complaints, lawsuits, or litigation filed with the Commission on the basis of race, color, or natural origin.

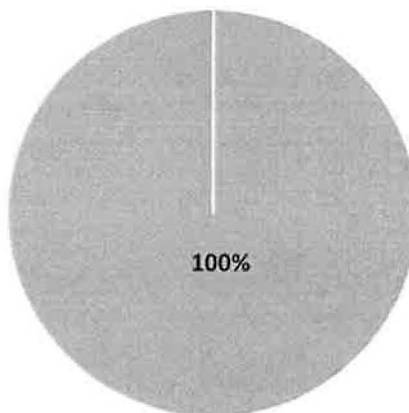
TITLE VI TRAINING

The Commission's Title VI coordinator has attended all scheduled Title VI meetings, workshops, and informational sessions that have been sponsored by the Tennessee Human Rights Commission (The agency has in previous terms attended Title VI sessions spearheaded by the Legislative Black Caucus of the Tennessee General Assembly as well as the Tennessee Urban League). The Commission's Title VI coordinator, Mr. Mitchell is committed to attending additional Title VI training opportunities, both within Tennessee and outside, as they become available.

During the fiscal year the Commission conducted its annual Title VI training for all of its employees, which totaled 54 in number. **The training was conducted and completed by Commission staff between July 15 and July 30 of 2025 (the Commission does not employ the use of Sub-Recipients).** The training consisted of an interactive web-based method of engagement, through which staff was informed and trained on the Title VI law and reminded of the Commission's commitment to the law (**See ATTACHMENT G**). The training covered the critical areas of the Commission's commitment to providing its services without partiality to one's race, color or national origin and the agency's dedication to serving Tennessee's citizens with Limited English Proficiency (LEP). Staff participation and completion of the training was recorded and monitored by the Title VI coordinator to ensure that 100% completion of the training was achieved.

The Commission's Title VI training for fiscal year July 2024 – June 2025 will be conducted in the 2nd quarter of 2025.

TPUC Staff Completed Title VI Training {June 2025}



*The percentage represents staff completion of the Title VI training

SUB-RECIPIENT MONITORING

Not applicable. There are no sub-recipient relationships that exist with entities outside the Commission. **As such, the Tennessee Public Utility Commission utilizes no vendors in the inspection of Tennessee's intra-state natural gas pipelines. All such inspections are performed by the Tennessee Public Utility Commission's Gas Pipeline Safety engineers.**

Pursuant to the Commission's utilization of a federal grant from the United States Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) to perform safety inspections of Tennessee's natural gas pipelines and natural gas distribution operators, the Commission's federal grant is narrowly directed at performing safety inspections of natural gas pipes, valves and other hardware that cross the state.

PUBLIC NOTICE AND OUTREACH

The Commission participates in state-wide outreach programs to inform diverse groups about the services provided by and through the agency. Notices of the programs are published on the agency's web page and on its social media platforms like Twitter, and Instagram. In addition, in previous years information has been shared on local radio stations and by public service announcements.

The following are the outreach activities the Tennessee Public Utility Commission has engaged in:

- **I Can-Connect Program for Deaf/Blind citizens:** The Tennessee Public Utility Commission partners with the Helen Keller National Center to provide information about the "I Can Connect Program." I Can Connect, also known as the Deaf-Blind distribution program - is a national effort across the United States to provide assistive communication equipment to Tennessee's deaf and blind citizens.
- **Tennessee Relay Service:** relay service is an operator assisted service that allows people who are deaf, hard of hearing, deafblind, or have a speech disorder to place calls to standard telephone users via a keyboard or assistive device. The Tennessee Public Utility Commission partners with Sprint and Hamilton Relay/CapTel to inform eligible citizens of the availability Relay service and Caption telephone equipment to Tennessee's deaf and hard of hearing population.
- **The Telecommunications Devices Access Program (TDAP):** the TDAP program is designed to distribute appropriate telecommunications devices so that persons who have a disability may effectively use basic telephone service.

The Tennessee Public Utility Commission promotes these programs to Tennessee's citizens primarily through its website and through its social media platforms such as X (formally Twitter) and Instagram. In addition, the policy is posted in the agency's common area accessible to visitors and employees.

The Commission's Title VI implementation plan is available upon request to any interested groups and minority members of these groups may review the plan and provide suggestions and recommendations for future plans.

COMPLIANCE REPORTING

Federal or state departments/agencies to which the Commission furnishes or shares Title VI compliance reports: **Not applicable.**

There exist no sub-recipient relationships with entities outside the Commission. Title VI federal compliance reporting is not applicable. There are no Federal codes or regulations promulgated pursuant to 49 U.S.C. Section 60101 regarding compliance with Title VI. However, in the application for the gas pipeline safety grant, the Commission must certify its assurance regarding non-discrimination. The only Title VI-related document produced by the USDOT related to Title VI is its LEP Guidance, which was issued December 14, 2005 in the Federal Register (Vol. 70, No. 239).

EVALUATION PROCEDURES

As a condition of receipt of the federal grant from the United States Department of Transportation (USDOT) Pipeline and Hazardous Materials Safety Administration (PHMSA), the Commission has certified that it will comply with the requirements set forth in Title VI. As such, the Commission maintains that it will administer in a nondiscriminatory manner its statutory duties as a condition of receiving the federal funds from the grantor.

Pursuant to the federal grant, the State of Tennessee enters into a certification agreement each year with the Secretary of the Department of Transportation and accepts the responsibility for regulation of intrastate natural gas pipeline facilities. The program is administered by the United States Department of Transportation Pipeline and Hazardous Materials Safety Administration and the Tennessee Public Utility Commission is the regulating state agency. The Tennessee Public Utility Commission Gas Pipeline Safety Division enforces safety regulations in accordance with the Tennessee Code Annotated (“Tenn. Code Ann.”) § 65-2-102, the Tennessee Comprehensive Rules and Regulations (“Tenn. Comp. R. & Regs.”) 1220-4-5 and Title 49 of the Code of Federal Regulations (“CFR”) Chapter 1, Subchapter D, Parts 191, 192, 193, 195 and 199, as incorporated in the Tennessee rules by reference.

Hence, the grant received from United States Department of Transportation Pipeline and Hazardous Materials **does not have beneficiaries associated with the administration of the grant**, as the grant is utilized for the inspection of Tennessee’s 40,000 miles of distribution and transmission natural gas pipelines, in which the TPUC’s gas pipeline engineers perform annually.

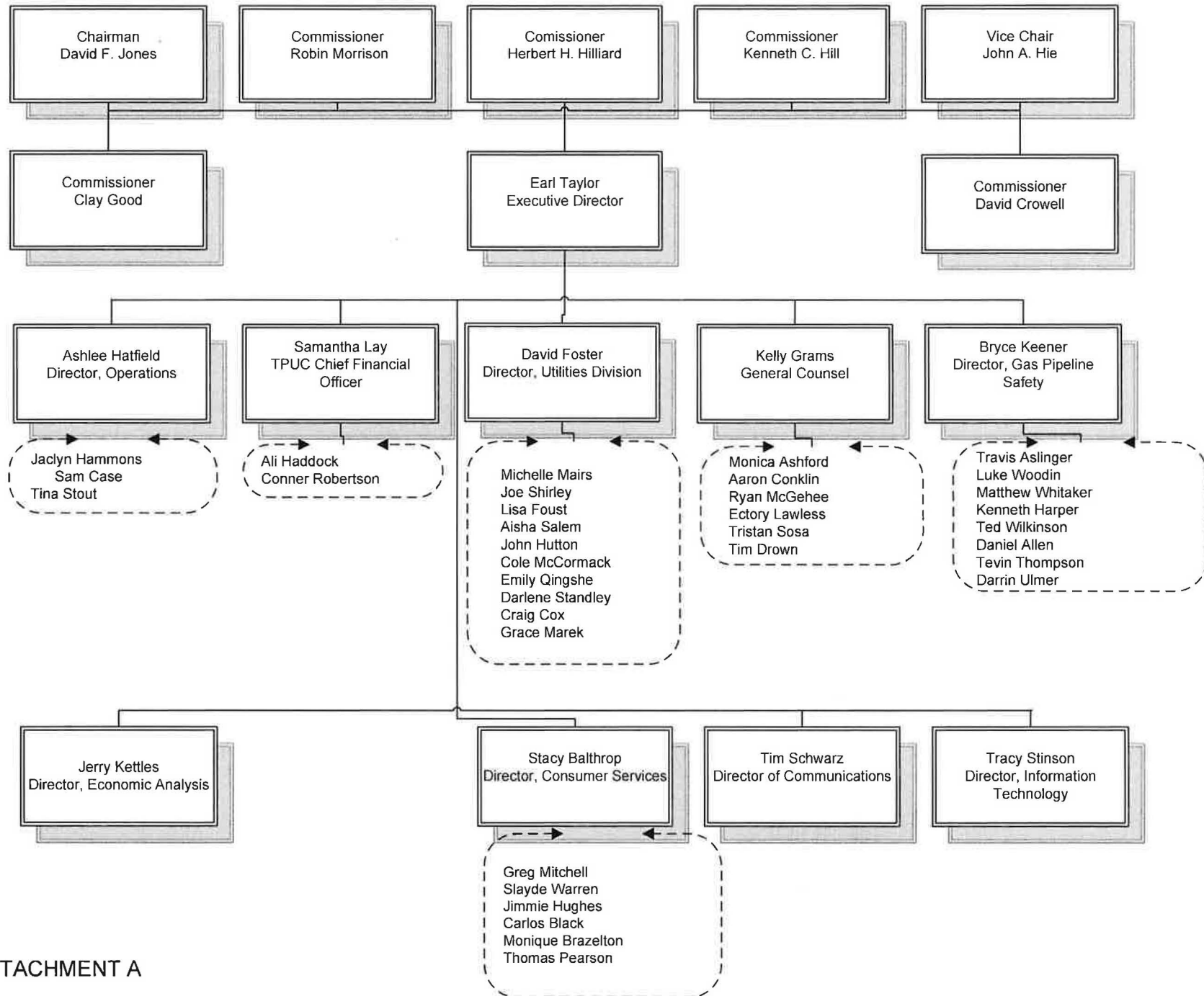
There are no Commission sub-recipients in the administration of the federal grant from the USDOT/PHMSA as all pipeline inspections are performed by the Commission’s Gas Pipeline Safety Division.

Moreover, the Commission evaluates the **Telecommunications Devices Access Program (TDAP)**, the need-based program that provides specialized devices to persons who are deaf, blind, hard of hearing, and/or vision impaired, by the number the devices distributed to persons whose disability determines need for a specialize telecommunication device.

Relay Service provides a communications link a between persons who are deaf, hard of hearing, deafblind, or have a speech disorder to place calls to standard telephone users via a keyboard or assistive device to persons without such disabilities. The service is accessed by user need as determined by the person’s particular disability.

The **I-Can-Connect** Program is a national program funded at the federal level (FCC) across the United States to provide communication equipment for Tennessee’s deaf and blind population according to the Helen Keller standards.

Tennessee Public Utility Commission



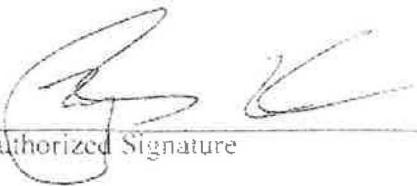


Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Avenue, SE
Washington DC 20590

OFFICE OF PIPELINE SAFETY

2024 Gas Base Grant Progress Report

Office: Tennessee Public Utility Commission


Authorized Signature

Boyle Keener
Printed Name

Director, Gas Pipeline Safety Division
Title

3/18/25
Date



2024 Grant Payment Summary

TENNESSEE

Grant PO Number -
693JK32430040PGSB

Grant Allocation

State Estimated Program Costs	\$ 1,981,700
Original Allocation - Grant Award	\$ 1,232,960
Original Allocation Percentage	62.22%

Funding Summary

Year-End Final Costs (adjusted if necessary)*	\$ 1,677,280
Final Funding Percentage	69.6371%
Total Federal Funding	\$ 1,168,009
State Portion of Funding	\$ 509,271

Payment Summary

Total Federal Funding	\$ 1,168,009
Mid-Year Payment Made to State	\$ -
Final Payment to State	\$ 1,168,009
Supplemental Payment After Reallocation (if applicable)	\$ -

Deduction Summary - Credit Memo (if applicable)

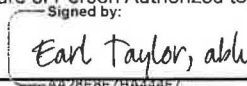
Grant Review CY2021	\$ -
Grant Review CY2022	\$ -
Grant Review CY2023	\$ -

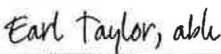
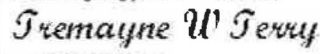
Net Total Payments - (after deductions)	\$ 1,168,009
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***Comments**

N/A

***The above represent Close-Out of Grant Funding for applicable year

ASSISTANCE AGREEMENT			
1. Award No. 693JK32440025PSOC	2. Modification No.	3. Effective Date 08/19/2024	4. CFDA No. 20.721
5. Awarded To TENNESSEE PUBLIC UTILITY COMMISSION Attn: Brittany J Shaw 502 DEADERICK ST # 4 NASHVILLE TN 372430200	6. Sponsoring Office PHH Grants and Registration 1200 New Jersey Ave, SE Washington DC 20590		7. Period of Performance 10/01/2024 through 09/30/2025
8. Type of Agreement ☒ Grant ☐ Cooperative Agreement ☐ Other	9. Authority		10. Purchase Request or Funding Document No. PH956-24-0005
11. Remittance Address TENNESSEE PUBLIC UTILITY COMMISSION Attn: Brittany J Shaw 502 DEADERICK ST. 4TH FLOOR NASHVILLE TN 37243	12. Total Amount Govt. Share: \$46,899.00 Cost Share : \$0.00 Total : \$46,899.00		13. Funds Obligated This action: \$46,899.00 Total : \$46,899.00
14. Principal Investigator	15. Program Manager REX EVANS Phone: 217-679-8495	16. Administrator PIPELINE AND HAZARDOUS MATERIALS SA Acquisition Services Division 1200 New Jersey Avenue SE, East Bldg, 3r Washington DC 20590	
17. Submit Payment Requests To	18. Paying Office PHMSA Delphi eInvoicing System https://einvoice.esc.gov		19. Submit Reports To
20. Accounting and Appropriation Data 5172324TB5.2024.PSGRT02020.50D0207000.41050.61000000.0000000000.0000000000.0000000000.0000000000			
21. Research Title and/or Description of Project FY 2024 One-Call Grant			
For the Recipient		For the United States of America	
22. Signature of Person Authorized to Sign Signed by: 		25. Signature of Grants/Agreements Officer RHONDA ANDREA THOMAS Digitally signed by RHONDA ANDREA THOMAS	
23. Name and Title Earl Taylor, abh Executive Director	24. Date Signed 8/30/2024	26. Name of Officer RHONDA THOMAS	Date: 2024.08.20 12:24 -04'00'

ASSISTANCE AGREEMENT			
1. Award No. 693JK32440018PSDP		2. Modification No.	3. Effective Date
4. CFDA No.			
5. Awarded To TENNESSEE PUBLIC UTILITY COMMISSION Attn: Ms Brittany Shaw 502 DEADERICK ST # 4 NASHVILLE TN 372430200		5. Sponsoring Office PIPELINE AND HAZARDOUS MATERIALS SA Office of Pipeline Safety (PHP) 1200 New Jersey Avenue SE, East Bldg, 3rd Washington DC 20590	
7. Period of Performance 10/01/2024 through 09/30/2025			
8. Type of Agreement ☒ Grant ☐ Cooperative Agreement ☐ Other		9. Authority	
10. Purchase Request or Funding Document No. PH956-24-0004			
11. Remittance Address TENNESSEE PUBLIC UTILITY COMMISSION Attn: TENNESSEE PUBLIC UTILITY COMMISSION 502 DEADERICK ST. 4TH FLOOR NASHVILLE TN 37243		12. Total Amount Govt. Share: \$86,229.00 Cost Share : \$0.00 Total : \$86,229.00	
13. Funds Obligated This action: \$86,229.00 Total : \$86,229.00			
14. Principal Investigator		15. Program Manager HUNG NGUYEN Phone: 202-713-7913	
16. Administrator PIPELINE AND HAZARDOUS MATERIALS SA Acquisition Services Division 1200 New Jersey Avenue SE, East Bldg, 3rd Washington DC 20590			
17. Submit Payment Requests To PHMSA Delphi eInvoicing System https://einvoice.esc.gov		18. Paying Office FAA/MMAC/PHMSA HQ 272F AMK 316 6500 S. MacArthur Blvd Oklahoma City OK 73169	
19. Submit Reports To			
20. Accounting and Appropriation Data 5172324TB2.2024.PSGRT03020.50D0207000.41050.61000000.0000000000.0000000000.0000000000.0000000000			
21. Research Title and/or Description of Project FY 2024 STATE DAMAGE PREVENTION (SDP) GRANT			
For the Recipient		For the United States of America	
22. Signature of Person Authorized to Sign Signed by: 		25. Signature of Grants/Agreements Officer 	
23. Name and Title Earl Taylor, abh Executive Director		26. Name of Officer TREMAYNE TERRY Supervisor	
24. Date Signed 8/30/2024		27. Date Signed 8/29/2024	

Tennessee Public Utility Commission



LIMITED ENGLISH PROFICIENCY (LEP) POLICY

The TPUC is committed to ensuring that Tennessee citizens with Limited English Proficiency (LEP) are provided with the means and opportunity to participate fully in the services and information that the TPUC provides. As such, we set forth the following policy directives to maintain this standard.

- The Commission will take certain actions and steps to ensure that persons with Limited English Proficiency (LEP) will have an equal opportunity and purposeful access to the information and services made available by the TPUC.
- The Commission will endeavor to maintain an established means of communication to persons with LEP by means of an established language translation service provider.
- The translators, interpreters and other aids needed to comply with the Commission's policy will be offered without cost to the LEP population being served.
- Such provided services will be made available through bilingual translators, fluent in multiple languages.
- CSD staff shall be provided with translation services contact information, such as service provider information cards and informational posters and kept current on new updates to translation services provided, such as new languages offered.
- CSD will maintain a record of LEP interactions. This information shall be available for review by the public.
- If requested, the translation of Commission documents will be provided to persons with LEP.
- CSD staff is advised to contact the commission's Title VI coordinator, if additional LEP resources are needed.
- Language translation will be provided through the State of Tennessee's contract service provider, Avaza Language Services (or through another State of Tennessee approved vendor of language translation services).

Tennessee Public Utility Commission



Title VI Complaint Form

Name (Optional):

Address:

Phone:

Email:

Please describe the incident in detail (use a separate sheet if necessary)

Circle below the basis of the complaint:

Race Color National Origin

Name, address, and phone number of other persons who may have knowledge of the discriminatory event (if applicable):

Date of alleged event:

Please mail form to: Tennessee Public Utility Commission, Title VI Coordinator, 502 Deaderick St, Nashville, TN 37243. Or to the Tennessee Human Rights Commission, William R. Snodgrass Bldg, Tennessee Towers, 312 Rosa L. Parks Blvd, 23rd Floor, Nashville, TN 37243

Attachment E

Tennessee Public Commission Title VI Complaint Log



<u>Name (Optional)</u>	<u>Address, City, State Zip</u>	<u>Ph.</u>	<u>Email</u>
1)			
2)			
3)			
4)			
5)			

2025 TPUC Title VI Training

Each year the Tennessee Public Utility Commission is required to undergo Title VI training. The training is designed to reaffirm our agency's commitment to comply with the Title VI law of the Civil Rights Act of 1964. The following training module will ensure that each employee understands and is aware of the Commission's commitment to Title VI and our efforts to support it.

1. As an employee of the Tennessee Public Utility Commission, do you reaffirm the agency's commitment to the Title VI law of the Civil Rights Act that prohibits entities from denying services or benefits based on race, color, or national origin?*

Required field

- ☐ Yes
- ☐ No

2. The Tennessee Public Utility Commission is committed to serving citizens with Limited English Proficiency (LEP) to ensure that they are provided with equal opportunity and access to the services and information provided by the Commission. Do you? *

- ☐ Support
- ☐ Oppose

3. The Tennessee Public Utility Commission utilizes language translation services for Limited English Proficiency (LEP) citizens. Do you agree to assist

LEP citizens by forwarding such inquiries to the appropriate Division or person within the agency for assistance? *

☐ Yes

☐ No

4. Title VI also prohibits providing services or benefits in a discriminatory manner. One such example would include favoring one sector of the population over another sector to promote a TPUC consumer assistance program. As a TPUC employee do you affirm the agency's commitment to provide services or benefits without partiality? *

☐ Yes

☐ No

5. Any person alleging discrimination based on race, color, or national origin has a right to file a complaint with the TPUC within 180 days of the alleged incident. As a TPUC employee, do you affirm the agency's commitment to the complaint filing process and agree to forward all such complaints to the appropriate Division? *

☐ Yes

☐ No

6. Title VI allows for complaints to be filed either verbally or in written form without the complainant providing their identity. As a TPUC employee do you affirm the agency's commitment to the complaint filing process that allows for the non-disclosure of complainant's identity? *

☐ Yes

☐ No

7. All Title VI complaints may be filed with the TPUC's Consumer Services Division or with the Executive Director's office. Do you Affirm? *

☐ Yes

☐ No

Name *

First Name

Last Name

Tennessee Public Utility Commission



Limited English Proficiency (LEP) Encounters (FY 24-25)

Month	Encounters
Jul 2024	1
Aug 2024	0
Sep 2024	2
Oct 2024	0
Nov 2024	0
Dec 2024	0
Jan 2025	0
Feb 2025	0
Mar 2025	0
Apr 2025	0
May 2025	0
Jun 2025	0
Total (LEP) Encounters	4