REQUEST NO. COC 10.80:

Please describe all circumstances in which PGL has categorized any subset of its work as “emergency, safety and reliability (‘ESR’) work” (see NS-PGL Ex. 50.0 at 3:48) prior to submitting NS-PGL Ex. 50.0. If such “ESR” categorization has been in used in documents, please provide a copy of those documents. Please identify which SMP quarterly reports submitted to the Commission have used the term “ESR” to categorize your work.

RESPONSE:

The Company objects to this request as overly broad and unduly burdensome. The level of detail sought by this request -- specifically the requests for identification of “all circumstances,” “any subset of its work,” and any “documents” -- means that the likely burden or expense of the proposed discovery, including electronically stored information, outweighs the likely benefit, taking into account the amount in controversy, the resources of the parties, the importance of the issues in the litigation, and the importance of the requested discovery in resolving the issues. The Company further objects to this request to the extent it seeks information beyond the scope of the rate case and as irrelevant to the subject matter of the pending action and as not calculated to lead to the discovery of admissible evidence. Subject to these objections and without waiving the same, the Company answers as follows:

The term “ESR work,” which stands for emergency, safety, and reliability work, has not been used previously. “ESR work” is being used in this rehearing to help distinguish and bundle the SMP projects that are not included in the “neighborhood by neighborhood” work, but represent “short cycle” (i.e., “emergency”), “system improvement,” and “public improvement” projects.

Every SMP quarterly report submitted to the Commission has included information pertaining to “short cycle”, “public improvement”, and “system improvement” projects under the header of “PI/SI” portions of the report. The ESR projects proposed to be authorized by the Commission to be performed and recovered in Peoples Gas’ rates as part of this rehearing are those short cycle, system improvement, or public improvement projects that are required to address immediate emergencies, as well as work that needs to be undertaken to avoid emergencies and service interruptions in the near term.
1 See North Shore Gas Co., et al., ICC Docket Nos. 23-0068/0069 (cons.), Final Order (Nov. 16, 2023), at 29.

Person(s) Responsible:
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