

April 1, 2015

Ms. Elizabeth A. Rolando
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

Re: North Shore Gas Company
Submission of Section 5-111 Report for CY2014

Dear Ms. Rolando:

Per the requirements of Section 5-111 of the Public Utilities Act, attached is the reporting submission package for North Shore Gas Company's metrics for calendar year 2014.

Attachment 1 is the notarized verification statement.

Attachment 2 is the reporting narrative that supplies additional detail for each Section 5-111(b) metric, goal and job attributed to the metric.

Attachment 3 is the report form.

Attachment 4 is the definitions used for the report.

Sincerely,



Thomas J. Webb
Compliance Manager
The Peoples Gas Light and Coke Company
North Shore Gas Company

cc: Matthew Smith (w/attachments)

Attachment 1
to the letter

From:
TJ Webb (NSG)

To:
EA Rolando (ICC)

Dated:
April 1, 2015

Re:
Notarized Verification Statement

VERIFICATION

STATE OF ILLINOIS

COUNTY OF COOK

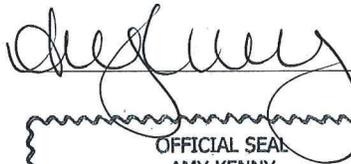
Thomas J. Webb makes oath and says that he is Compliance Manager of North Shore Gas Company; that he has examined the attached report submitted pursuant to Section 5-111 of the Public Utilities Act (220 ILCS 5/5-111); that to the best of his knowledge, information and belief, all statements of fact contained in said report are true and said report is a correct statement of the information of the respondent required to be provided pursuant to Section 5-111 in respect to each and every matter set forth therein during the period from and including January 1, 2014, to and including December 31, 2014.



Thomas J. Webb

Subscribed and sworn before me, a Notary Public in and for the State and County names, this 1st day of APRIL, 2015.

My Commission expires on: 3/27/16





Attachment 2
to the letter

From:
TJ Webb (NSG)

To:
EA Rolando (ICC)

Dated:
April 1, 2015

Re:
Reporting Narrative

NSG SB2266 Reporting Metrics Narrative

1. Emergency Calls

a. Metric

- i. The number of emergency calls with response times exceeding 30 & 60 minutes is an existing metric that has been previously tracked in the CFirst computer program with the Composite Leak Order Tracking Report. The percentage of calls exceeding 30 & 60 minutes is also being reported since the goal is set as a percentage.
- ii. The number of emergency calls in which the flow of gas was stopped or vented in times exceeding 60 & 90 minutes was tracked starting in February 2014; therefore, no goal existed for 2014. The leak form was modified and qualified personnel were trained to document their arrival time and time to make safe.

b. 2015 Goal

- i. The number of emergency calls with response times exceeding 30 & 60 minutes has existing goals of less than 25% and less than 0.5% respectively. These goals were met in 2014 and are the same for 2015.
- ii. The 2015 goal for the number of emergency calls in which the flow of gas was stopped/vented in times exceeding 60 & 90 minutes is less than 25% and less than 20 % respectively.

c. Jobs Attributed to Metric

- i. The jobs attributed to this metric include field support (leak chasers), field supervisors, dispatchers, dispatch supervisors and 3rd party call center (IQor) personnel.
- ii. The jobs attributed to this metric include service first responders, gas workers, distribution crews and supervisors.

2. Number of Incidents

a. Metric

- i. PGL & NSG damage metrics are tracked monthly by the PGL System Integrity Group. The damage to NSG as a result of NSG error includes NSG crews damaging NSG facilities, locating errors by NSG and locating subcontractor and incorrect mapping of NSG facilities in the Navigate database.
- ii. The damage to NSG facilities as a result of 3rd party errors includes damages from personnel other than NSG employees. Subcontractors (except locating subcontractor) are included in this metric. NSG met the 2014 goal.

b. 2015 Goal

- i. The damage incidents per thousand gas facility locate requests goal was developed by the General Manager of NSG and took into account historical performance in 2014.

c. Jobs Attributed to Metric

- i. The jobs attributable to this metric include NSG personnel qualified to perform locates, NSG personnel qualified as first responders and subcontractors

3. Cathodic Protection Readings Below -0.850 Volts

- a. Metric
 - i. The number of initial reads below -0.85 volts was supplied by the Operations General Supervisor and includes mains and services read annually and every 10 years. NSG met this 2014 goal.
- b. 2015 Goal
 - i. The 2015 goal is to maintain approximately the same amount as the 2014 actuals. A true representation of the system will not be fully known for another 8 years.
- c. Jobs Attributed to Metric
 - i. The jobs attributable to this metric include corrosion technicians, contractors for inspections and remediation, and management personnel.

4. Service Lines Inactive > 3 Years and Not Disconnected from Source

- a. Metric
 - i. A system query was performed by personnel from the Central Planning Group to provide data for this metric. NSG did not meet the 2014 goal to cut out the oldest 50 inactive services (pre-1990). Twenty-one of the 50 oldest services remained inactive at the end of 2014.
- b. 2015 Goal
 - i. The 2015 goal for this metric is to disconnect 100 services from a group of the 250 oldest services.
- c. Jobs Attributed to Metric
 - i. The jobs attributable to this metric include the full time equivalent of work crews needed to disconnect inactive services based on the number of cut offs and manhours required per cut off.

5. Number of Difficult to Locate Services Replaced

- a. Metric
 - i. NSG has the ability to locate all mains and services in its territory by conductive or inductive methods or by use of company records.
- b. 2015 Goal
 - i. NSG does not anticipate replacing any main or service based solely on difficulty of locating the facility.
- c. Jobs Attributed to Metric
 - i. Since no facility will be replaced based on locating difficulty, no jobs are attributed to this metric.

6. Number of Remotely-Readable Cathodic Protection Devices

- a. Metric
 - i. The number of remotely-readable cathodic protection devices was supplied by the Manager of Corrosion Control Group. Rectifiers and bonds are reported separately. The 2014 goal was met.

- b. 2015 Goal
 - i. All existing rectifiers and bonds have a remotely-readable device. NSG will install a remotely-readable cathodic protection device on all new installations.
- c. Jobs Attributed to Metric
 - i. The jobs attributable to this metric include a technician to install a bond.

7. Miles of Main Replaced

- a. Metric
 - i. The numbers reported for 2013 and 2014 are the amount of miles of main with “retired” status in NSG’s system of record and reported by the Work Asset Management (WAM) program.
- b. 2015 Goal
 - i. The NSG system of distribution mains contains cathodically protected coated steel and MDPE plastic only. Therefore, NSG has no plans to replace any mains in 2014.
- c. Jobs Attributed to Metric
 - i. Since no facilities are planned to be replaced, no jobs are attributed to this metric.

8. Number of Services Replaced

- a. Metric
 - i. The numbers reported for 2013 and 2014 are the amount of services with “retired” status in NSG’s system of record and reported by the Work Asset Management (WAM) program.
- b. 2015 Goal
 - i. NSG does not currently plan to replace any services in 2014.
- c. Jobs Attributed to Metric
 - i. Since no facilities were replaced in 2014, no jobs are attributed to this metric.

9. Miles of Transmission Facilities on Which MAOP Have Been Established

- a. Metric
 - i. The miles of transmission facilities with established MAOP were derived from Part Q of the 2013 NSG annual PHMSA report for Gas Transmission and Gathering Systems. NSG pressure tested 0.1 miles of main due to a casing project.
- b. 2015 Goal
 - i. The goal for 2015 is to develop a plan to address the sections of transmission line that do not have adequate records verifying their MAOP.
- c. Jobs Attributed to Metric
 - i. There are currently no jobs attributed to this metric.

10. Miles of Transmission Facilities Equipped with Remotely Controlled Shut Off Capability

- a. Metric
 - i. The miles of transmission facilities equipped with remotely controlled shut off capability were supplied by the Manager of Gas Control and Pipeline Operations after a review of a system query.

- b. 2015 Goal
 - i. Planning for remotely operated valves will be determined after a MAOP plan is established for the NSG system.
- c. Jobs Attributed to Metric
 - i. There are currently no jobs attributable to this metric.

11. Diversity of Contracting

- a. Metric
 - i. The data for minority, women and veteran owned businesses was supplied by the Director of Supply Chain Services and is derived from the PGL and NSG 2014 Supplier Diversity Report. NSG met its goal for female owned businesses, but not for minority owned or veteran owned businesses.
- b. 2015 Goal
 - i. The reported goal for 2015 is a consolidated goal for both PGL and NSG.
- c. Jobs Attributed to Metric
 - i. A new position has been designated to monitor this metric.

Attachment 3
to the letter

From:
TJ Webb (NSG)

To:
EA Rolando (ICC)

Dated:
April 1, 2015

Re:
Section 5-111 Report for CY2014

Sec. 5-111. Natural gas performance reporting.

NORTH SHORE GAS
NATURAL GAS DELIVERY

EMERGENCY CALLS

Number of emergency calls with response times exceeding 30 minutes

Number of emergency calls with response times exceeding 60 minutes

Number of emergency calls in which the utility stopped/vented the flow of natural gas on the system:

in a time exceeding 60 minutes

in a time exceeding 90 minutes

Total Jobs Attributed to Emergency Calls

NUMBER OF INCIDENTS

Number of incidents of damage per thousand gas facility locate requests to the utility's pipeline facilities resulting from:

Utility error

The fault of third parties;

Total Jobs Attributed to Number of Incidents

OTHER

Number of scheduled cathodic protection readings below -0.850 volts;

Number of service lines that were inactive for over 3 years and not disconnected from a source of supply;

Number of difficult to locate services replaced

Number of remotely-readable cathodic protection devices

Total Jobs Attributed to Other

MILES OF MAIN REPLACED

Miles of main replaced that were constructed of:

Required	(A) Calendar Year 2014 Sec. (b)(c)	(B) Prior Calendar Year Sec. (c)	(C) Year-Over- Year Change (A) - (B)	Jobs Attributed 2013 Sec. (c)	Jobs Attributed 2014 Sec. (c)	2014 Goal Sec. (d)	2015 Goal Sec. (d)
Under							
(b)(1)	1376 (24.2%)	1232 (23.6%)	144 (0.6%)			<25%	< 25%
(b)(1)	22 (0.4%)	17 (0.3%)	5 (0.1%)			< 0.5%	< 0.5%
				56	56		
(b)(1)	24 (19.84%)	no 2013 data				See Note 1	< 25%
(b)(1)	17 (14.05%)	no 2013 data				See Note 1	< 20%
Sec. (c)					113		
(b)(2)	0.45/1000	0.33/1000 (See Note 2)	0.12/1000			0.26/1000	0.26/1000
(b)(2)	1.20/1000	1.13/1000 (See Note 3)	0.07/1000			1.5/1000	1.5/1000
Sec. (c)					100		
(b)(3)	183	423	-240	10	10	814	175
(b)(4)	891 (21- pre1990)	915	-24	2	4	Disconnect 50	Disconnect 100
(b)(5)	0	0	0	0	0	0	0
(b)(6)	2 rectifier; 1 bond	1 rectifier; 0 bonds (See Note 4)	1 rectifier; 1 bond	1	1	Install 1 bond	Install remote to all new rectifier or bond
Sec. (c)					13		

Sec. 5-111. Natural gas performance reporting.

NORTH SHORE GAS
NATURAL GAS DELIVERY

	Required	(A)		(B)	(C)	Jobs	Jobs	2014	2015
		Calendar Year 2014	Prior Calendar Year						
		Sec. (b)(c)	Sec. (c)	Sec. (c)	(A) - (B)	Sec. (c)	Sec. (c)	Sec. (d)	Sec. (d)
Cast Iron	Under (b)(7)	0	0	0	0				
Wrought Iron	(b)(7)	0	0	0	0				
Ductile Iron	(b)(7)	0	0	0	0				
Unprotected Coated Steel	(b)(7)	0	0	0	0				
Unprotected Bare Steel	(b)(7)	0	0.082	0	-0.082				
Mechanically Coupled Steel	(b)(7)	0.15	0	0	0.15				
Copper	(b)(7)	0	0	0	0				
Cellulose Acetate Butyrate (CAB) Plastic	(b)(7)	0	0	0	0				
Pre-1973 DuPont Aldyl "A" Polyethylene	(b)(7)	0	0	0	0				
PVC	(b)(7)	0	0	0	0				
Other types of materials identified by a State or Federal government agency as being prone to leakage	(b)(7)	0	0	0	0				
Total Miles of Main Replaced		0.15	0.082	0.068				0	0
SERVICES REPLACED									
Number of services replaced that were constructed of:									
Cast Iron	(b)(7)	0	0	0	0				
Wrought Iron	(b)(7)	0	0	0	0				
Ductile Iron	(b)(7)	0	0	0	0				
Unprotected Coated Steel	(b)(7)	0	0	0	0				
Unprotected Bare Steel	(b)(7)	0	176	-176					
Mechanically Coupled Steel	(b)(7)	0	0	0	0				
Copper	(b)(7)	7	3	4					
Cellulose Acetate Butyrate (CAB) Plastic	(b)(7)	0	0	0					
Pre-1973 DuPont Aldyl "A" Polyethylene	(b)(7)	0	0	0					
PVC	(b)(7)	0	0	0					
Other types of materials identified by a State or Federal government agency as being prone to leakage	(b)(7)	0	0	0					
Total Number of Services Replaced		7	179	-172				0	0
Total Jobs Attributed to Miles of Main & Number of Services Replaced	Sec. (c)					3			
TRANSMISSION									
Number of miles of transmission facilities on which maximum allowable operating pressures have been established									
	(b)(8)	28.3	28.2	0		2.1 FTE		28.2	28.2
Number of miles of transmission facilities equipped with remotely controlled shut-off valve capability									
	(b)(9)	0	0	0		0		0	0
Total Jobs Attributed to Transmission	Sec. (c)					2.1			0.35

Sec. 5-111. Natural gas performance reporting.



	Required	(A) Calendar Year 2014 Sec. (b)(c)	(B) Prior Calendar Year Sec. (c)	(C) Year-Over- Year Change (A) - (B)	Jobs Attributed 2013 Sec. (c)	Jobs Attributed 2014 Sec. (c)	2014 Goal Sec. (d)	2015 Goal Sec. (d)
DIVERSITY OF CONTRACTING								
Value in dollars of contracts in force with:								
Minority Owned businesses	(b)(10)	\$15,279,000 (2.91%) (See Note 6)	\$7,216,740 (2.28%) (See Note 7)	\$8,062,260 (0.63%)			3% (See Note 5)	4% (See Note 5)
Female Owned businesses	(b)(10)	\$94,311,000 (17.93%) (See Note 6)	\$51,688,708 (16.24%) (See Note 7)	\$42,622,292 (1.69%)			10% (See Note 5)	11% (See Note 5)
Qualified Service-Disabled Veteran-Owned businesses	(b)(10)	\$910,000 (0.17%) (See Note 6)	\$772,427 (0.24%) (See Note 7)	\$137,573 (0.07%)			0.2% (See Note 5)	0.3% (See Note 5)
Total Jobs Attributed to Diversity of Contracting	Sec. (c)							

Note 1 - Goal to be developed after a review of 2014 data
 Note 2 - Reported 0.26/1000 in 2013. Error identified by internal audit
 Note 3 - Reported 1.44/1000 in 2013. Error identified by internal audit
 Note 4 - Reported 1 bond in 2013. Incorrectly reported.
 Note 5 - Goal is a consolidated goal for NSG and PGL. We do not have goals split out for each company.
 Note 6 - 2014 numbers reflect the removal of contractors who do not hold a third party MBE/WBE/VBE certification.
 Note 7 - 2014 numbers are the consolidated spend of PGL and NSG, which reflect the removal of contractors who do not hold a third party MBE/WBE/VBE certification.
 Note 8 - 2013 numbers are the consolidated spend of PGL and NSG.

Attachment 4
to the letter

From:
TJ Webb (NSG)

To:
EA Rolando (ICC)

Dated:
April 1, 2015

Re:
Definitions

Definitions for SB2266 New Natural Gas Reporting Metrics

1. Section b1 – **Emergency call** – notification of Customer Care Center (City-wide Dispatch) of an emergency condition. (Emergency condition codes on Composite Leak Order Tracking Report from C-First program – A,B,E,F,G,H,O). The emergency conditions include:
 - a. severe and normal leaks (inside premises or outside)
 - b. explosion
 - c. fire
 - d. carbon monoxide leak
 - e. fire department call
 - f. odor

At a minimum, leak and odor times will be reported to the ICC.

2. Section b1 – **Dispatch** – a central entity for receiving emergency notifications and coordinating day-to-day crew activity.
3. Section b1 – **Response time** – time elapsed from Dispatch center notification to gas company responder arrival on scene (received to arrived).
4. Section b1 – **Stopped or vented natural gas** – applies to Excavation Damage hits only. The time elapsed from time a qualified individual (employee that has the ability to start performing tasks that restrict the flow of gas on the system) arrives at the scene (arrive time) until the flow of gas is stopped or vented (time made safe).
5. Section b2 – **Incidents of damage** – definition from Illinois Underground Utility Facilities Damage Prevention Act:

“The contact or dislocation of any underground utility facility during excavation or demolition which necessitates immediate or subsequent repair by the owner of such facility.”
6. Section b2 – **Locate request** – (from CGA best practices handbook) a communication between an excavator and one call center personnel in which a request for locating underground facilities is processed.
7. Section b2 – **Damage to Utility as a result of Utility error** – damage to an operator’s facility due to operator’s (NOT including operator sub-contractors, but including locating sub-contractor) mistakes including:
 - a. not hand digging while excavating
 - b. un-marked and mis-marked facilities

- c. incorrect facility mapping
 - d. not requesting a locate
 - e. excavating outside requested limits
 - f. failing to support or protect facility
 - g. not maintaining locate marks
 - h. relying on someone else's locate
 - i. damage by non-power equipment
 - j. failure to maintain proper clearance
 - k. improper backfilling
 - l. difficult to locate facilities
 - m. ticket not valid/excavation without a proper ticket (digging early, ticket expired)
 - n. not exposing facilities for boring
8. Section b2 – **Damage to Utility as a result of Third Party error** – damage to an operator's facility due to personnel other than operator employees. Subcontractors (except as noted above) are included in this metric. (PGL Damage Prevention metrics "PGL 3rd Party – Cont at Fault" tab).
Types of damage include:
- a. not hand digging while excavating
 - b. not requesting a locate
 - c. excavating outside requested limits
 - d. failing to support or protect facility
 - e. not maintaining locate marks
 - f. relying on someone else's locate
 - g. damage by non-power equipment
 - h. failure to maintain proper clearance
 - i. improper backfilling
 - j. ticket not valid/excavation without a proper ticket (digging early, ticket expired)
 - k. not exposing facilities for boring
9. Section b3 – **Scheduled cathodic protection reading** – main and service pipe initial corrosion protection (pipe to soil) readings scheduled by the Corrosion department, not including maintenance, follow-ups or remediation readings. For mains, if the high or low read (worst case) is greater than -0.85V it will be reported.
10. Section b4 – **Inactive** – services no longer in use with no customer on record, premises/building could be occupied or not occupied.
11. Section b4 – **Services inactive greater than 3 years and not disconnected from a source of supply** –

The following "how off" methods are to be included in this metric:

- a. Inactive CIS

- b. Internally plugged
- c. Locked at Bbox
- d. Locked at riser
- e. Plugged at valve
- f. RH off inside front building
- g. Shutoff at riser
- h. Shutoff at valve
- i. Shutoff at valve with lock

Note: Services that have been cut off at the main, cut off between the main and building or disconnected at the riser will not be included in this metric.

12. Section b5 – **Difficult to locate services** – is a service that :
- a. "Difficult to locate main" refers to a main from which a utility cannot obtain a reliable locating signal.
 - b. "Difficult to locate service pipe" means a service pipe from which a utility cannot obtain a reliable locating signal.
 - c. "Difficult to locate" for PGL means:
 - i. Cannot be located conductively (i.e. plastic services with no tracer wire) and
 - ii. Cannot be located inductively and
 - iii. for which there are no drawings and records do not exist

A line that can be located using any one of the above three methods is a locatable line and does not meet this definition.

Will only report number of difficult to locate services replaced.

13. Section b6 – **Remotely-readable cathodic protection devices** – a method of monitoring the cathodic protection status of protection devices (e.g. anode, rectifier, bond) without the need for an on-site visit. Defined as Remote Monitoring Units (RMU) installed that will monitor rectifiers and bonds.

Initial report – base number of installed RMUs.

14. Section b7 – **Miles of main and number of services replaced** – main and service pipes constructed from Qualifying Material no longer actively carrying natural gas. Replaced mains and services have been superseded by modern materials such as steel and polyethylene (PE) plastic. Mains and services may be removed, cut off and abandoned in place or used as insertion medium for more modern materials.

Replaced = Retired. Retired is defined as when an asset has been physically cut off from the source of supply and purged of gas.

- a. For Distribution mains – after As-built complete
- b. For Distribution services – after As-built reconciliation
- c. For Transmission and High Pressure Distribution – after As-built reconciliation, enter retired date manually into Powerplant.

Installed = In-service. In-service –when an asset becomes used or useful; when the main or service gets pressurized with natural gas.

- a. For Distribution mains – after gas pressurization is completed – Compliance clock starts (leak surveys, inspections, etc.) and accounting \$ reported (this does NOT require a distribution service to be installed on the main); after As-built complete for PHMSA & ICC reporting.
- b. For Distribution services – after gas pressurization is completed – Compliance clock starts (leak surveys, inspections, etc) and accounting \$ reported(the distribution service will be stubbed and capped at house at this point, but a meter may not be installed yet); after As-built reconciliation for PHMSA & ICC reporting.
- c. For Transmission and High Pressure Distribution – enter installed date manually into PowerPlant. Accounting \$ reported and compliance starts when in-service (gassed date) entered in PowerPlant. Units will be tracked and reported by the transmission group.

15. Section b7 – **Qualifying Material** – The following are defined as Qualifying Material:

- a. cast iron
- b. ductile iron
- c. unprotected coated steel
- d. unprotected bare steel
- e. mechanically coupled steel
- f. copper
- g. cellulose acetate butyrate (CAB clear) plastic
- h. wrought iron
- i. pre-1973 Aldyl “A” polyethylene
- j. pvc plastic

16. Section b8 – **Transmission facilities** – Transmission facilities = transmission line

Definition from 49 CFR 192.3 – Transmission line means a pipeline, other than a gathering line, that: (1) Transports gas from a gathering line or storage facility to a gas distribution center, storage facility, or large volume customer that is not down-stream from a gas distribution center; (2) operates at a hoop stress of 20 percent or more of SMYS; or (3) transports gas within a storage field.

17. Section b8 – **Maximum Allowable Operating Pressure (MAOP)** – Definition from 49 CFR 192.3 – means the maximum pressure at which a pipeline or segment of a pipeline may be operated under this part.
18. Section b8 – **Miles of Transmission facilities on which MAOP have been established** – derived from Part Q of the annual Gas Transmission and Gathering Systems PHMSA report by subtracting the total incomplete records from the grand total mileage.
19. Section b9 – **Remotely controlled shut-off valve** – valves that have the ability to be opened or closed by Gas Control Department personnel in the Gas Control Center or valves that automatically respond to system conditions to isolate a fault.
20. Section b9 – **Miles of transmission facilities equipped with remotely controlled shut-off capability** – transmission pipeline owned by the company with remotely controlled shut-off valves. Report miles protected by ASVs and RSVs and number of ASVs and RSVs on the system.
21. Section b10 – **Minority-owned business** – (from ICC Annual Goal and Total Work Performed Report) an American business which is at least 51% owned, operated and controlled on a daily basis by one or more American citizens of the following ethnic minority classifications (includes second tier spend, self certifications are acceptable):
 - a. African American
 - b. Asian American which includes Sub Asian Continent Americans (India, Pakistan, etc.) and Asian-Pacific Americans (Japan, China, Korea, etc.)
 - c. Hispanic American – not of the Iberian peninsula
 - d. Native American (indigenous people of the continental United States, Hawaii and Alaska)
22. Section b10 – **Female-owned business** – (from ICC Annual Goal and Total Work Performed Report) an American business which is at least 51% owned, operated and controlled on a daily basis by one or more female American citizens (includes second tier spend, self certifications are acceptable).
23. Section b10 – **Qualified service disabled veteran-owned business** – (from ICC Annual Goal and Total Work Performed Report) an American business which is at least 51% owned, operated and controlled on a daily basis by one or more US Veteran/US Service Disabled Veterans (includes second tier spend, self certifications are acceptable).