

April 1, 2016

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 CY2015

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 2015.

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, 2016

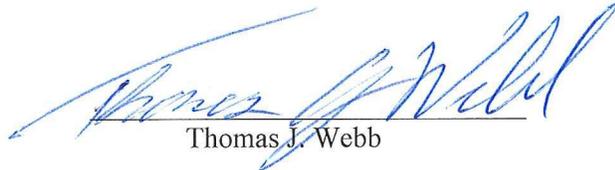
Re:
Notarized Verification Statement

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, 2015, to and including December 31, 2015.


Thomas J. Webb

Subscribed and sworn before me, a Notary Public in and for the State and County names, this 15th day of April, 2016.

My Commission expires on:





Attachment 2
to the letter

From:
TJ Webb (NSG)

To:
EA Rolando (ICC)

Dated:
April 1, 2016

Re:
Reporting Narrative



2015 NATURAL GAS PERFORMANCE REPORT

IN COMPLIANCE WITH SECTION 5-111
OF THE PUBLIC UTILITIES ACT –
NATURAL GAS PERFORMANCE
REPORTING

4/1/2016

North Shore Gas Company (NSG)

2015 Performance Results and 2016 Performance Goals

- 1. The number of emergency calls with response times exceeding 30 minutes and 60 minutes and the number of emergency calls in which the flow of natural gas was stopped/vented in times exceeding 60 minutes and 90 minutes.**

Emergency Calls – Response Times

The number of emergency calls with response times exceeding 30 minutes and 60 minutes is an existing metric that has been previously tracked in the company's customer information system (C-First) with the Composite Leak Order Tracking Report. The percentage of calls exceeding 30 minutes and 60 minutes is also being reported since the goal is set as a percentage. NSG met the 2015 goals for both response times.

The number of emergency calls with response times exceeding 30 minutes and 60 minutes has existing goals of less than 25% and less than 0.5%, respectively. These goals will remain the same for 2016.

Emergency Calls – Make Safe Times

The number of emergency calls in which the flow of gas was stopped or vented (time made safe) in times in excess of 60 minutes and 90 minutes is reported by the Work Asset Management (WAM) program. The percentage of calls exceeding 60 minutes and 90 minutes is also being reported since the goal is set as a percentage. NSG has met the 2015 goals for both make safe times.

The existing goal for the number of emergency calls in which the time elapsed from the time a qualified individual arrives at the scene until the time the gas is stopped/vented is less than 25% and 20% for times exceeding 60 minutes and 90 minutes, respectively.

The 2016 goal has been modified to the number of emergency calls in which the time elapsed from the time the emergency call is received until the time that the gas is stopped/vented is less than 50% and 35% for times exceeding 60 minutes and 90 minutes, respectively.

The way in which NSG measures make safe times was changed to enhance safety performance. The start period has been moved prior to a qualified individual arriving on scene because it is important to track the overall response, starting from the emergency call.

Year-to-Year Metric & Goal Comparison			
Year	Time Elapsed	Goal	Metric Definition
2015	Over 60 Minutes	Less than 25%	The time elapsed from the time a qualified individual (who can restrict the flow of gas) arrives at the scene until the time the gas is stopped/vented.
	Over 90 Minutes	Less than 20%	
2016	Over 60 Minutes	Less than 50%	The time elapsed from the time the Emergency Call is received until the time that the gas is stopped/vented.
	Over 90 Minutes	Less than 35%	

The jobs attributed to both emergency call metrics include service first responders, gas workers, distribution crews and supervisors.

2. **The number of incidents of damage per thousand gas facility requests to the utility’s pipeline facilities results from utility error and the number of incidents of damage per thousand gas facility locate requests to the utility pipeline facilities resulting from the fault of third parties.**

Number of Incidents – Utility Error

NSG damage metrics are tracked monthly by the NSG System Integrity Group. The damage to NSG facilities 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.

Number of Incidents – The Fault of Third Parties

The damage to NSG facilities as a result of third party errors includes damages from personnel other than NSG employees. Subcontractors (except locating subcontractor) are included in this metric.

NSG met the number of incidents goal in 2015 for damages resulting from the fault of third parties, but did not meet its goal for damages resulting from utility error. The 2016 goals will remain the same for each metric.

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

3. **The number of cathodic protection readings below -0.850 Volts.**

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 its 2015 goal.

The 2016 goal is to maintain relative to the 2015 actuals. A true representation of the system will not be fully known for another 7 years.

The jobs attributed to this metric include corrosion technicians, contractors for inspections and remediation, and management personnel.

4. The number of service lines that were inactive for over 3 years and not disconnected from a source of supply.

This metric includes services greater than three years where there was no customer account and the service line was not disconnected at the main. A system query was performed by personnel from the Central Planning Group to provide data for this metric. NSG exceeded its 2015 goal to disconnect over 100 services inactive over three years, disconnecting 202.

The 2016 goal is more aggressive with a target to disconnect 250 inactive services. The ultimate goal is to have no inactive services exceed three years.

The jobs attributed to this metric include the full-time equivalent of work crews needed to disconnect inactive services based on the number of cut offs and man hours required per cut off.

5. The number of difficult to locate services that were replaced.

This metric includes services that were replaced due to difficulty during locating. NSG has the ability to locate all mains and services in its territory by conductive or inductive methods or by use of company records.

NSG does not anticipate replacing any main or service based solely on difficulty of locating the facility.

Since no facility will be replaced based on locating difficulty, no jobs are attributed to this metric.

6. The number of remotely-readable cathodic protection devices.

The number of remotely-readable cathodic protection device installations is tracked because these devices increase operating efficiency by reducing read times. The number of remotely-readable cathodic protection devices was supplied by the Manager of the Corrosion Control Group. Rectifiers and bonds are reported separately. No new devices were installed in 2015. There are three remaining.

For 2016, NSG plans to maintain its goal of installing remote devices on any new installations.

The jobs attributed to this metric include technicians to install the devices on rectifiers.

- 7. The miles of main and number of services replaced that were constructed of cast iron, wrought iron, ductile iron, unprotected coated steel, unprotected bare steel, mechanically coupled steel, copper, cellulose acetate butyrate (CAB) plastic, pre-1973 DuPont Aldyl "A" polyethylene, PVC or other types of materials identified by a state or federal governmental agency as being prone to leakage.**

For purposes of this metric, "replaced" and "retired" are used synonymously, as further described below.

Miles of Main Replaced

The numbers provided in previous reports are the amounts with "retired" statuses in NSG's system of record and reported by the Work Asset Management (WAM) program.

NSG's distribution system contains cathodically protected coated steel and MDPE plastic only. Therefore, NSG has no plans to replace any mains in 2016.

Since NSG has no plans to replace any mains covered by this category, no jobs are attributed to this metric.

Number of Services Replaced

Identical to miles of main reporting process, the number of services replaced is tracked through the Work Asset Management (WAM) program. NSG replaced two services in 2015.

NSG currently has no plans in replacing any services in 2016.

Since NSG has no plans to replace any services covered by this category, no jobs are attributed to this metric.

- 8. The number of miles of transmission facilities on which maximum allowable operating pressures (MAOP) have been established.**

The miles of transmission facilities with established MAOP were derived from the 2015 NSG annual PHMSA report for Gas Transmission and Gathering Systems. NSG met its 2015 goal.

The goal for 2016 is to continue to address the sections of transmission line that do not have adequate records verifying their MAOP.

There are currently no jobs attributed to this metric.

- 9. The number of miles of transmission facilities equipped with remotely controlled shut off capability.**

This metric includes remotely controlled shut off valves that were installed on NSG facilities. These installations increase efficiency by making it possible to remotely isolate segments of NSG's transmission line. 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. There were no miles of transmission facilities equipped with remotely controlled shut off capability in 2015.

The 2016 goal is to maintain or improve from the previous year.

There are currently no jobs attributed to this metric.

10. The value in dollars of contracts in force with minority-owned, female owned, and qualified service-disabled veteran-owned businesses.

The data for minority (MBE), women (WBE) and veteran-owned (VBE) businesses was supplied by the Director of Supply Chain Services and is derived from the PGL and NSG 2015 Supplier Diversity Report. PGL and NSG met their 2015 goal for minority-owned businesses, but not for women-owned or veteran-owned businesses.

The reported goal for 2016 is a consolidated goal for both PGL and NSG. The 2016 goal is set at 17.3% (9% MBE, 8% WBE and 0.3% VBE).

Attachment 3
to the letter

From:
TJ Webb (NSG)

To:
EA Rolando (ICC)

Dated:
April 1, 2016

Re:
Section 5-111 Report for CY2015

Sec. 5-111. Natural gas performance reporting.									
									
		(A)	(B)	(C)	Jobs	Jobs	2015	2016	
	Required	Calendar Year 2015	Prior Calendar Year 2014	Year-Over-Year Change	Attributed 2014	Attributed 2015	Goal	Goal	Comments
	Under	Sec. (b)	Sec. (c)	(A) - (B)	Sec. (c)	Sec. (c)	Sec. (d)	Sec. (d)	
EMERGENCY CALLS									
Number of emergency calls with response times exceeding 30 minutes	(b)(1)	1225 (23.0%)	1376 (24.2%)	-151 (1.2%)			<25%	< 25%	
Number of emergency calls with response times exceeding 60 minutes	(b)(1)	16 (0.3%)	22 (0.4%)	-6 (0.1%)			< 0.5%	< 0.5%	
					56	56			
Number of emergency calls in which the utility stopped/vented the flow of natural gas on the system:									
in a time exceeding 60 minutes	(b)(1)	18 (15.79%)	24 (19.84%)	-6 (4.05%)			< 25%	< 50%	The 2016 metric definition has been modified. NSG now includes the moment the call is received in measuring the time made safe.
in a time exceeding 90 minutes	(b)(1)	10 (8.77%)	17 (14.05%)	-7 (5.28)			< 20%	< 35%	
Total Jobs Attributed to Emergency Calls	Sec. (c)				113	113			
NUMBER OF INCIDENTS									
Number of incidents of damage per thousand gas facility locate requests to the utility's pipeline facilities resulting from:									
Utility error	(b)(2)	0.56/1000	0.45/1000	0.11/1000			0.26/1000	0.26/1000	
The fault of third parties;	(b)(2)	0.29/1000	1.20/1000	-0.91/1000			1.5/1000	1.5/1000	
Total Jobs Attributed to Number of Incidents	Sec. (c)				100	96			
OTHER									
Number of scheduled cathodic protection readings below -0.850 volts;	(b)(3)	175	183	37	10	15	175	175	
Number of service lines that were inactive for over 3 years and disconnected from a source of supply;	(b)(4)	202 disconnected	891 (21- pre1990)		4	4	Disconnect 100	Disconnect 250	
Number of difficult to locate services replaced	(b)(5)	0	0	0	0	0	0	0	
Number of remotely-readable cathodic protection devices	(b)(6)	2 rectifiers; 1 bond	2 rectifiers; 1 bond	0 rectifiers; 0 bonds	1	2	Install remote devices on all new installations	Install remote devices on all new installations	
Total Jobs Attributed to Other	Sec. (c)				15	21			
MILES OF MAIN REPLACED									
Miles of main replaced that were constructed of:									
Cast Iron	(b)(7)	0	0	0					
Wrought Iron	(b)(7)	0	0	0					
Ductile Iron	(b)(7)	0	0	0					
Unprotected Coated Steel	(b)(7)	0	0	0					
Unprotected Bare Steel	(b)(7)	0	0	0					
Mechanically Coupled Steel	(b)(7)	0	0.15	-0.15					
Copper	(b)(7)	0	0	0					
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 Miles of Main Replaced		0	0.15	-0.15			0	0	
SERVICES REPLACED									
Number of services replaced that were constructed of:									
Cast Iron	(b)(7)	0	0	0					
Wrought Iron	(b)(7)	0	0	0					
Ductile Iron	(b)(7)	0	0	0					
Unprotected Coated Steel	(b)(7)	0	0	0					
Unprotected Bare Steel	(b)(7)	0	0	0					

Sec. 5-111. Natural gas performance reporting.									
									
		(A)	(B)	(C)	Jobs	Jobs	2015	2016	
	Required	Calendar Year 2015	Prior Calendar Year 2014	Year-Over- Year Change	Attributed 2014	Attributed 2015	Goal	Goal	Comments
	Under	Sec. (b)	Sec. (c)	(A) - (B)	Sec. (c)	Sec. (c)	Sec. (d)	Sec. (d)	
Mechanically Coupled Steel	(b)(7)	0	0	0					
Copper	(b)(7)	2	7	-5					
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		2	7	-5			0	0	
Total Jobs Attributed to Miles of Main & Number of Services Replaced	Sec. (c)				0	0			
TRANSMISSION									
Number of miles of transmission facilities on which maximum allowable operating pressures have been established	(b)(8)	28.3	28.3	0	0	0	28.2		Maintain or improve from previous year
Number of miles of transmission facilities equipped with remotely controlled shut-off valve capability	(b)(9)	0	0	0	0	0	0	0	
Total Jobs Attributed to Transmission	Sec. (c)				0.35	0			
DIVERSITY OF CONTRACTING									
Value in dollars of contracts in force with:	(b)(10)								
Minority Owned businesses	(b)(10)	\$25,332,000 (5.68%)	\$15,279,000 (2.91%)	\$10,053,000 (2.77%)			4% (See Note 1)	9% (See Note 1)	
Female Owned businesses	(b)(10)	\$31,712,000 (7.11%)	\$94,311,000 (17.93%)	-\$62,599,000 (10.82%)			11% (See Note 1)	8% (See Note 1)	
Qualified Service-Disabled Veteran-Owned businesses	(b)(10)	\$1,024,000 (0.23%)	\$910,000 (0.17%)	\$114,000 (0.06%)			0.3% (See Note 1)	0.3% (See Note 1)	
Total Jobs Attributed to Diversity of Contracting	Sec. (c)				1	1			
Note 1 - Goal is a consolidated goal for NSG and PGL. We do not have goals split out for each company.									

Attachment 4
to the letter

From:
TJ Webb (NSG)

To:
EA Rolando (ICC)

Dated:
April 1, 2016

Re:
Definitions

North Shore Gas Company (NSG)

Definitions for SB2266 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 the time the emergency call is received 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 mismarked 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

Note: (NSG considers its contractors part of definition 8, third party errors)

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. (NSG Damage Prevention metrics "NSG 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. Reliably locate for NSG 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
 - iv. A line that can be located using any one of these 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 and 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 and 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** – Class 3, Class 4 and High Consequence Area (HCA) pipeline from MAOP Verification database. Number of miles in which MAOP has been established where one did not have a verifiable MAOP previously. Report the total number of miles, total number of verifiable miles and miles incrementally established each year.
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, miles not protected and number of ASVs and RSVs on the system.
21. Section b10 – **Minority-owned business** – “Minority-owned business enterprise” (“MBE”) means (1) a business enterprise (a) that is at least 51% owned by a minority individual or group(s) or (b) if a publicly owned business, at least 51 % of the stock of which is owned by one or more minority groups, and (2) whose management and daily business operations are controlled by one or more of those individuals. The contracting utility shall presume that minority includes, but is not limited to, Black Americans, Hispanic Americans, Native Americans, Asian Pacific Americans, and other groups, as defined herein. The business holds a certificate by a third party who determined on the basis of firm-provided information and the representations therein, that the business is a bona fide MBE.

Note: Foreign-owned companies operating in or out of the U.S. are not included.

22. Section b10 – **Women-owned or female-owned business** – “Women-owned business enterprise” (“WBE”) may also be referred to as female-owned, means (1) a business enterprise (a) that is at least 51% owned by a woman or women or (b) if a publicly owned business, at least 51% of the stock of which is owned by one or more women; and (2) whose management and daily business operations are controlled by one or more of those individuals. The business holds a certificate by a third party who determined on the basis of firm-provided information and the representations therein, that the business is a bona fide WBE.

Note: Foreign-owned companies operating in or out of the U.S. are not included.

23. Section b10 – **Veteran-owned business** – “Veteran-owned small business” (“VBE”) as used in this provision means a small business that: (1) is at least 51% unconditionally owned by one or more veterans; or in the case of any publicly owned business, at least 51% of the stock of which is unconditionally owned by one or more veterans; and (2) whose management and daily business operations are controlled by one or more veterans. The business holds a certificate by

a third party who determined on the basis of firm-provided information and the representations therein, that the business is a bona fide VBE.

Note: Foreign-owned companies operating in or out of the U.S. are not included.

Notes:

In Leak Response, even if the person, in fact, spends only part of his time on this function, this person is included in the jobs attributed because he is still needed in case a leak response becomes necessary.