

EXHIBIT D

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December 23, 2003

VIA FACSIMILE (312-551-0497)

Mr. Amos Smith
Counsel for Mt. Pisgah Missionary Baptist Church
120 W. Madison, Suite 1104
Chicago, IL 60602

Re: Mt. Pisgah Missionary Baptist Church, ICC No. 03-0124

Dear Mr. Smith:

I am in receipt of your client's answer to Peoples Gas' discovery requests which were propounded to you on October 29, 2003. Unfortunately, many of your client's responses are insufficient to satisfy each respective request. Therefore, pursuant to Illinois Supreme Court Rule 201(k) I am requesting that your client more completely and sufficiently answer "RESPONDENT'S FIRST REQUEST FOR INFORMATION."

First, with regard to Request No. 1 you have objected that it is overly broad and unduly burdensome. That objection is unfounded. Request No. 1 seeks only information bearing directly upon the merits of this dispute and can not be made more narrow or specific. Peoples Gas requests that your client answer Request No. 1 to the best of its information or belief in accordance with the Illinois Rules of Civil Procedure and the Illinois Supreme Court Rules.

As for Request No. 2, Peoples Gas seeks copies of all communications and all documents relating to any communications answered by your client in Request No. 1 including all bills, disconnection notices and postings relating to the premises. Request No. 2 seeks only relevant information bearing directly upon the merits of this matter and can not be made more narrow or specific. Peoples Gas requests that your client completely answer Request No. 2 to the best of its information and belief.

Your client's response to Request No. 3 is also inadequate and insufficient. Response No. 3 requests detailed information relating to appliances which may consume gas on the premises. Rather than answering Request No. 3 completely, your client has merely stated that they use gas for heating, hot water and that your client possesses two stoves that they use from time to time. Peoples Gas requests that you more completely answer Request No. 3 including providing the date of installation for each appliance, its location in the premises, the portion of the premises heated by each appliance (if it is used for heating), its btu or cfh rating and the date that any gas-consuming appliance has been removed from the premises. Since no objection was raised in your answer, any objections are waived and Peoples Gas expects a more complete and definite answer to be forthcoming.

Request No. 4 has not been answered sufficient, and no objection has been raised in your client's answer. Request No. 4 seeks information relating to readings of the gas meter (located on the premises) taken by your client or anyone acting on behalf of your client. It does not request an acknowledgment that Peoples Gas reads your client's meter. In accordance with Request No. 4, please provide a list of all of the readings of the gas meter at the premises taken by your client or anyone acting on behalf of your client; the date of each reading; the name of the person who took that reading; and copies of any documents relating to such readings.

As for Request No. 5, your objections are unfounded and invalid under Illinois Supreme Court Rules 201 and 214. Please completely and properly respond to this Request.

Please more fully and completely respond to Request No. 7. This Request specifically asks your client to describe where the gas meter is located within the premises and the methods by which it is accessed (for example, is it behind locked doors, etc.). Unfortunately, your client's response only indicates that a gas meter is located on the premises. Accordingly, Peoples Gas requests a more complete and sufficient answer to Request No. 7.

Finally, please provide a more full and complete response to Request No. 8. Peoples Gas requests separately, for each individual listed in your client's answer to Request No. 8, the hours and dates when each person was present at the premises during the period which Complainant disputes the gas bills. Also, please provide the dates and times when each individual stated in Response No. 8 had access to the place where the meter is located.

Your cooperation in this matter is greatly appreciated. Enclosed please find a copy of "RESPONDENT'S FIRST REQUEST FOR INFORMATION." If you have any questions, please do not hesitate to contact me directly. I can be reached at 312-641-2068.

Best regards,



Brett J. Beattie
Counsel to Peoples Gas

BJB/clp

Enclosure