

**ICC Docket No. 09-xxxx** AG/CUB/City Exh. 5.01, Page 1 of 3  
**The Peoples Gas Light and Coke Company's Response to  
Staff Data Requests CLH 1.01  
Dated: March 20, 2009**

**REQUEST NO. CLH 1.01:**

For both North Shore and Peoples, please provide comparisons of billings to actual customers under present rates vs. proposed rates using the following procedures: Please use the attached Excel file (File name "CLH 1.05 attachment.xls") as a model to present monthly bill comparisons for each customer selected from each customer class. All charges applicable to each customer class should be shown. For transportation customers, substitute the PGA rate for each month in the test year as a proxy for the cost of gas supply. Please leave formulae within calculation cells intact. Add or delete lines and charges as necessary or appropriate that are applicable to each customer class at both North Shore and Peoples.

- A. Identify the primary service classifications for which an individual tariff exists in the company's schedule of rates (tariff book). An example for Peoples would be Service Classification No. 1, Small Residential Service.
- B. Identify subgroups of customers within the primary service classification with common or similar usage characteristics and/or for which a rider, rate or discount currently exists.
- C. For each primary service classification and each subgroup within that classification identified in response to the previous questions, A. and B. above, provide a schedule showing present rates and proposed rates, and calculate the typical customer's monthly bill for the twelve months preceding the rate filing at the present and proposed rates including any subgroup discounts or riders. Also, please provide a billing analysis similar to Schedule E-9 for each such customer group or customer.
- D. For each month of the test year and for each customer class and each subgroup at present rates, please provide a billing comparison for an actual customer from the 1% customer class cumulative billing frequency, 20% customer class cumulative billing frequency, the 50% customer class cumulative billing frequency, the 80% cumulative customer class cumulative billing frequency, and the 100% customer class cumulative billing frequency.

In selecting customers for the response to part D., the customer class cumulative billing frequency should be similar to Schedule E-8 in that the billing frequency begins with zero or low usage or demand, and is completed at 100 percent with the highest end of usage or demand. Customers from each customer class and each subgroup should be selected based upon usage or demand at present rates depending upon whether usage charges, excluding gas supply, or demand charges was responsible for the larger percentage of revenues from the customer class as a whole during the test year.

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For example, if a People's customer served under S.C. No. 4 during the test year paid both a demand charge and distribution charge where the distribution charge results in more revenues under present rates than the demand charge, then therms billed under the distribution charge would serve as the basis for determining a customer's place in the billing frequency.

**RESPONSE:**

A. The Primary Service Classifications at Present Rates for Peoples Gas are as follows:

- S.C. 1 Small Residential Service
- S.C. 2 General Service
- S.C. 4 Large Volume Demand Service
- S.C. 5 Contract Service for Electric Generation (no customers taking service)
- S.C. 6 Standby Service
- S.C. 7 Contract Service (no rate change proposed)
- S.C. 8 Compressed Natural Gas Service

B. Peoples Gas is proposing to eliminate S.C. 6 and transfer these customers to S.C. 2. In addition, Peoples Gas is proposing an eligibility requirement for S.C. 2, which results in a transfer of some customers from S.C. 2 to S.C. 4. Therefore, the Subgroups for each Service Classification for Peoples Gas are as follows:

- S.C. 1 Sales
- S.C. 1 Rider CFY (Choices For You)
- S.C. 2 Meter Class 1 Sales
- S.C. 2 Meter Class 1 Rider CFY (Choices For You)
- S.C. 2 Meter Class 1 Rider FST (Full Standby Transportation)
- S.C. 2 Meter Class 1 Rider SST (Selected Standby Transportation)
- S.C. 2 Meter Class 2 Sales
- S.C. 2 Meter Class 2 Rider CFY (Choices For You)
- S.C. 2 Meter Class 2 Rider FST (Full Standby Transportation)
- S.C. 2 Meter Class 2 Rider SST (Selected Standby Transportation)
- S.C. 2 Meter Class 3 Sales
- S.C. 2 Meter Class 3 Rider CFY (Choices For You)
- S.C. 2 Meter Class 3 Rider FST (Full Standby Transportation)
- S.C. 2 Meter Class 3 Rider SST (Selected Standby Transportation)
- S.C. 2 to S.C. 4 Sales
- S.C. 2 to S.C. 4 Rider SST (Selected Standby Transportation)
- S.C. 4 Rider SST (Selected Standby Transportation)
- S.C. 6 to S.C. 2 Meter Class 1 Sales
- S.C. 6 to S.C. 2 Meter Class 2 Sales
- S.C. 6 to S.C. 2 Meter Class 3 Sales

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S.C. 6 to S.C. 2 Rider FST (Full Standby Transportation Service)  
S.C. 8 Sales

C. and D.

Attached are spreadsheets for each subgroup identified in item B. above that details present and proposed rate charges for accounts at different frequency levels using their usage and billing determinants from the Test Year, 2010. There are separate worksheets within each file that detail the charges for accounts at the various frequency levels requested. For subgroups in which there are fewer than 5 accounts, each account is detailed rather than the frequency levels requested.

The analysis includes the Pool and Contract Administrative Account charges for transportation customers in order to show the effect of the proposed changes in the charges even though these charges are billed to the Customer/Marketer. In addition, these charges are included in the data presented in Schedule E-9.

**Comparison of CLH 1.01 and Data Set - North Shore**

Percentile	Sales Customers		Transportation Customers	
	Annual Therms (CLH 1.01)	Annual Therms (from data set)	Annual Therms (CLH 1.01)	Annual Therms (from data set)
1%	4.04	206.48	38.43	393.31
20%	862.49	862.49	847.24	847.25
50%	1,238.04	1,238.06	1,118.66	1,118.67
80%	1,780.84	1,780.87	1,532.69	1,532.73
100%	38,876.64	38,876.64	15,489.87	15,489.87

**Comparison of CLH 1.01 and Data Set - Peoples**

Percentile	Sales Customers		Transportation Customers	
	Annual Therms (CLH 1.01)	Annual Therms (from data set)	Annual Therms (CLH 1.01)	Annual Therms (from data set)
1%	71.78	8.08	104.16	18.19
20%	408.70	408.71	593.79	593.80
50%	1,063.30	1,063.31	1,214.04	1,214.05
80%	1,625.94	1,625.94	1,733.91	1,734.01
100%	10,303.98	12,112.65	6,124.29	20,923.60

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**The Peoples Gas Light and Coke Company's Response to  
People of the State of Illinois Data Requests AG 2.00-2.53  
Dated: April 21, 2009**

**REQUEST NO. AG 2.17:**

Please provide an electronic file showing for each and every Peoples Gas SC 1 customer the customer's consumption in each month from the January 2006 meter reading through the December 2008 meter reading, and whether in each such month the customer was a sales or transportation customer. Please provide the information without any customer-identifying information (such as name or address), but provide a unique identifier for each customer (such as a customer number). Please provide this data in native format capable of manipulation and in one of the following formats that most closely matches the original: dBASE, Microsoft Access, Microsoft Excel, SAS, SPSS, comma-delimited ASCII, fixed-width ASCII. Please provide this information on CD-ROM or DVD-ROM in a Windows-compatible format.

**RESPONSE:**

Peoples Gas objects to this data request that seeks at least 37 pieces of information for each of the approximately 770,000 Peoples Gas SC 1 customers as overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of relevant and admissible evidence.

**SUPPLEMENTAL RESPONSE:**

Without waiving the foregoing objections and the general objections and based on discussions with the Attorney General's Office, Peoples Gas states:

The requested data is not readily available in the format and for the time period requested. However, Peoples Gas has provided the following data in SPSS format for the twelve-months-ended June 30, 2008.

- PGL\_02-AG-17 Attachment 1 – Extract of SC 1 Sales customers.
- PGL\_02-AG-17 Attachment 2 – Extract of SC 1 Transportation customers (i.e., Choices for You)

The files contain the following data fields:

1. ID
2. Account Number (Transportation customers only)
3. Year-end Service Classification ("P1" for Peoples Gas SC 1)
4. Year-end Sales Type ("S" for Sales customers, "T" for Transportation customers)
5. LIHEAP Indicator that a grant was received within the year ("Y" for yes, "N" for no)
6. Consumption in therms by month
7. Total annual therm consumption

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The data represents all Peoples Gas SC 1 customers with a full twelve months of consumption. Customers with less than twelve months of consumption or more than twelve months of consumption within the period have been excluded.

Consumption is "per books", as opposed to "as billed". Customers' meters are read and billed throughout the month. As a result, customer bills in any month represent many different billing cycles. The Customer Information System converts the information into the appropriate Revenue Months (i.e., "per books") for accounting and reporting purposes. The difference between per books and as billed represents a temporary timing difference.

For SC 1 customers participating in the Company's Choices For You Transportation program, the Account Number field has been appended to facilitate linking to data previously provided in the response to Staff Data Request DAS 1.04 ("DAS 1.04"). However, several important differences exist between data provided in this response and data provided in the response to DAS 1.04. First, as discussed above, data provided in this response is per books, while data provided in the response to DAS 1.04 is as billed and therefore not tied to particular months. Second, the response to DAS 1.04 reflects subsequent corrections or adjustments in the period that the therms were consumed, rather than in the month booked. Finally, the response to DAS 1.04 represents all SC 1 Transportation customers, including those with consumption for a partial year.

The requested files are only available in SPSS format. They are being produced to the Attorney General as requested in SPSS format on CD-ROM. These confidential & proprietary files are not being produced to any other party at this time.