

**THE RESPONSE OF  
THE MANCHESTER GROUP TO  
DATA REQUESTS NG-MAN 1.01 THROUGH NG-MAN 1.34 OF NICOR GAS**

**ICC DOCKET NO. 09-0301**

**NG-MAN 1.06** Referring to lines 30-32, please provide a list of the protection products offered by the Manchester Group including the different “iterations of price, coverage, and design.” Please indicate the geographic areas where these products are offered.

**RESPONSE:**

Manchester objects to this Data Request to the extent that it mischaracterizes and misconstrues the cited testimony. Manchester further objects to the extent this Data Request seeks information that is neither relevant or material to this proceeding. Further answering, see attachment NG-MAN 1.06 Attachment 1.

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**NG-MAN 1.06  
Attachment 1**



ENROLL TODAY  
PROTECT UP TO SIX  
LINES AND SAVE!

Sample A. Sample  
xxxx Sample Road  
Columbus, OH xxxxx

Dear Homeowner,

Your utility lines run throughout your house and in your yard. They withstand a tremendous amount of stress through years of ongoing use. You may be surprised to learn you own and are responsible for inside lines and outside water and sewer lines. These lines will fail over time and the cost of repair can **drain thousands of dollars** from your bank account.

**When this happens, who will you call?**

Typical **homeowners insurance does not cover utility line failures** due to normal wear and tear. You are responsible for the cost of repair, not to mention the hassle of finding a reputable repair person. Some people have purchased a program from Nicor, but their coverage costs twice as much for much less protection.<sup>1</sup>

**You need complete protection, you need Utility Shield.** Utility Shield is a utility line warranty product provided by The Manchester Group, part of one of the nation's largest deregulated residential energy products companies serving over 650,000 customers in 6 states. Utility Shield provides complete utility line repair service. We manage the entire repair process, utilize local contractors, and cover the cost of repairing utility lines that fail due to any covered cause. Utility Shield is the simple solution for your utility line protection needs.

Protect and save today!

*Monica Scharschmidt*

Monica Scharschmidt, Customer Relations Manager

P.S. You can protect six lines (inside and outside) for less than 45 cents a day.

**ENROLL IN UTILITY SHIELD AND SAVE UP TO 50%!**

FOR MORE INFORMATION CALL 1.800.581.8729

1) Nicor Services ("Nicor") is an unregulated affiliate of Nicor Gas. Savings estimates based upon published and advertised rates of Nicor Services as of April 2007.

ENROLLMENT CARD

**Step 1**

Enrollment Options:

Utility Line Protection	Monthly <small>(inside &amp; outside)</small>	or	Annually <small>(check all credit cards)</small>
Inside Line Protection	<input type="checkbox"/> \$6.00		<input type="checkbox"/> \$72.00
Or			
Outside Line Protection	<input type="checkbox"/> \$9.00		<input type="checkbox"/> \$108.00
Or			
Complete Coverage <small>(Inside &amp; Outside Protection)</small>	<input type="checkbox"/> \$13.95		<input type="checkbox"/> \$150.00

**Best Savings!**

**Less than 45c per day**

**Step 2**

**Method of Payment:** *(Please check only one option)*

Enclosed is a check for 1 year coverage (make check payable to The Manchester Group).

Please bill my:  Visa  MasterCard

Exp. Date: \_\_\_ / \_\_\_ / \_\_\_

Card# \_\_\_\_\_

Signature required\* \_\_\_\_\_

**Step 3**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone #: \_\_\_\_\_

Sample A Sample Promo Code: N001

XXXX XXXXXX XXX  
XXXXXXXXXX

By enrolling I understand that I am purchasing a service agreement and not an insurance policy, and I also certify that there are no pre-existing conditions affecting my utility lines. Prior removal of tree roots in your sewer line is deemed a pre-existing condition. \*By signing you authorize The Manchester Group to place plan charges on your credit card as a monthly or annual recurring fee. Call for other options.

## Don't have a protection plan yet?

Don't look to your homeowner's insurance for protection. Typical homeowner's insurance does not cover normal wear and tear. And going at it alone can cost you thousands of dollars in repair costs. Utility Shield provides up to \$18,000 of protection for less than 45 cents per day.

## Already paying for a protection plan from Nicor?

Stop paying too much for less coverage! With Utility Shield you get complete protection at a savings up to 50%<sup>1</sup>.

## Protect today.

With Utility Shield you get peace of mind knowing that when costly repairs are needed, you are protected. No hassle of finding qualified contractors. No securing permits. No worry because with Utility Shield you are protected through the entire repair process.

### UTILITY SHIELD OVERVIEW

Utility Shield's utility line protection plans provide repair or replacement service if a covered line fails due to normal wear and tear or inherent defects in material or craftsmanship.

You will receive coverage only for the lines in which you have enrolled and only if the protection plan has been paid in full as per your service agreement.

Utility Shield only provides service to failed lines which fail due to a covered cause. Utility Shield does not provide updating service to old failed lines due to changes in code requirements, recommendations by the utility or for any other reason. Other Limitations and Exclusions apply. Please read your entire service agreement.

### Eligibility

You must own or be responsible for the single family dwelling, planned unit development, or mobile home to which the covered lines are attached and be responsible for the upkeep of all your covered lines.

### Your Representations

By enrolling in a Utility Shield Protection Plan you must represent that you meet all Eligibility requirements and will continue to meet such requirements for the duration of the Plan and warrant that each covered line meets the eligibility requirements and:

1. Were installed by a licensed contractor;
2. Are in working order and in use at time of enrollment;
3. Are connected to a local public utility and receiving service at time of enrollment;
4. Meet all code and ordinance requirements at time of installation and initial connection for service; and
5. Are working properly and free of any known Leaks or Failures.

This brochure is not a contract and only provides a brief description of the Utility Shield Utility Line Protection Plan. After enrolling you will receive a service agreement to review. You have 30 days from the date of your enrollment to cancel without obligation. Any service provided under the Utility Shield Utility Line Protection Plan will be administered in accordance with the agreement. Coverage begins thirty (30) days after your enrollment is processed. It is solely your responsibility to determine your eligibility to participate in the Utility Shield Utility Protection Plan.

Utility Shield  
5025 Bradenton Ave.  
Suite D  
Dublin, Oh 43017

Utility Shield is a Manchester Group product

The Manchester Group is a licensed Other Services Provider with the IL Department of Insurance.

**STOP**  
**THROWING MONEY DOWN THE DRAIN!**



## IF YOU'RE NOT PROTECTED

Untimely repairs to your utility lines will drain your pocketbook.

## IF YOU'RE ALREADY PROTECTED

Are you paying too much?

## UTILITY SHIELD CAN HELP.



### COMPARE - PROTECT - SAVE

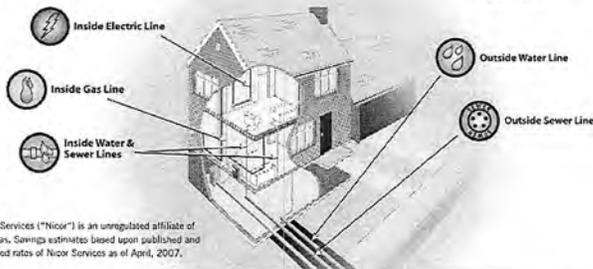
	Nicor <sup>1</sup>	Utility Shield
<b>Coverage Limits</b>	Inside Gas	\$600.00
	Inside Plumbing	\$300.00
	Inside Electric	\$300.00
	Outside Water	No Coverage
	Outside Sewer	No Coverage
<b>Cost per month</b>	Inside Gas	\$3.95
	Inside Plumbing	\$7.95
	Inside Electric	\$3.95
	Outside Water	No Coverage
	Outside Sewer	No Coverage
<b>Package Discounts</b>	Monthly Complete Package	\$13.95
	Annual Complete Package	\$150.00

*Up to \$18,000 Coverage*

**COMPLETE PROTECTION**  
\$13.95 per month (or pay annually and save 10%)

**INSIDE PROTECTION** \$6 per month

**OUTSIDE PROTECTION** \$9 per month



<sup>1</sup> Nicor Services ("Nicor") is an unregulated affiliate of Nicor Gas. Savings estimates based upon published and advertised rates of Nicor Services as of April, 2007.