

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

NORTH SHORE GAS COMPANY)
PEOPLES GAS LIGHT & COKE COMPANY)
) Docket No. 11-0280
Petition for General Increase in Delivery Service) Docket No. 11-0281 (cons.)
Rates)

**REPLY TO THE RESPONSE OF
PEOPLES GAS LIGHT & COKE COMPANY TO THE
MOTION TO RE-OPEN THE RECORD
OF THE PEOPLE OF THE STATE OF ILLINOIS
AND THE CITIZENS UTILITY BOARD**

The People of the State of Illinois (“the People”), by Lisa Madigan, Attorney General of the State of Illinois; and the Citizens Utility Board, through its counsel; pursuant to Part 200.190 of the Illinois Commerce Commission’s (“the Commission”) rules, 83 Ill.Admin.Code Part 200.190, hereby reply to the October 6, 2011 Response filed by Peoples Gas Light & Coke Company (“PGL”) to the People’s and CUB’s Motion to Re-Open the Record, filed on October 5, 2011.

1. In its Response, PGL asserts that the First District Appellate Court’s recent decision in *People ex rel. Madigan v. Illinois Commerce Comm’n*, Case Nos. 1-10-0654, 1-10-0655, 1-10-0936, 1-10-1790, 1-10-1846 and 1-10-1852 (slip op. of September 30, 2011) (“*Madigan*”) “has, at most, an indirect relationship to the forecasted levels of 2011 and 2012 main replacement capital investments included in Peoples Gas’ proposed rate base... .” PGL Response at 4. As a part of its Response to the Motion, PGL filed the one-page testimony of PGL witness Philip Hayes.

2. After the filing of that testimony, the People conducted discovery on the testimony submitted by Mr. Hayes. The Company responded to that discovery and the People

and Governmental and Consumer Intervenors' ("GCI") expert witness David J. Effron reviewed those responses.

3. The People and CUB seek leave to file the brief Supplemental Responsive testimony of Mr. Effron to the PGL Supplemental testimony. That testimony is attached.

4. While PGL may seek to reply to Mr. Effron's Supplemental Responsive testimony or take other action, the People and CUB do not anticipate the need for any additional hearings on this matter as the record stands to date.

5. The record of this docket remains open, according to the administrative law judges.

WHEREFORE, The People and CUB urge the Commission to admit the supplemental testimony of PGL witness Hayes and the supplemental responsive testimony of GCI witness David Effron.

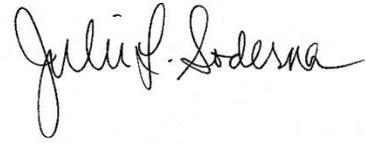
Respectfully submitted,

THE PEOPLE OF THE STATE OF ILLINOIS

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