

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

OFFICIAL FILE

Illinois Commerce Commission)
On Its Own Motion)

vs.)

United States Steel Corporation,)
Respondent)

Determination under Section 5 of the Illinois)
Gas Pipeline Safety Act of the plan USS is to)
have in place for the inspection and)
maintenance of its pipeline facilities in and)
near its Granite City Works.)

ILL. C. C. DOCKET NO. 10-0635

USS Cross Exhibit No. 2

Witness Buck

Date 3-22-12 Reporter CB

No. 10-0635

STAFF OF THE ILLINOIS COMMERCE COMMISSION'S RESPONSE TO UNITED STATES STEEL CORPORATION'S FIRST REQUEST TO ADMIT FACTS

NOW COMES the Staff of the Illinois Commerce Commission by its attorneys, pursuant to Sections 200.190 and 200.360(c) of the Illinois Commerce Commission's ("Commission") Rules of Practice, 83 Ill. Adm. Code 200.190, 200.360(c), and Illinois Supreme Court Rule 216, and states, in response to the United States Steel Corporation's ("U. S. Steel" or the "Company") First Request to Admit Facts, as follows:

Objections

1. Staff objects to USS's Requests to Admit to the extent they call for information which is exempt from discovery by virtue of the attorney-client privilege, work product privilege, or other applicable privilege.
2. Staff objects to USS's Requests to Admit insofar as they are vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests.
3. Staff objects to USS's Requests to Admit insofar as they are unduly burdensome.
4. Staff objects to USS's Requests to Admit insofar as they are not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

5. Staff objects to USS's Requests to Admit insofar as they seek information or documents, or seek to impose obligations on Staff which exceed the requirements of the Commission's rules of procedure, Illinois Rules of Civil Procedure or applicable Illinois law.

6. Staff objects to USS's Requests to Admit to the extent that the information of which admission is sought is already in the public record before the Commission or which is already in the possession, custody, or control of USS and to the extent that the data requests seek information and documents not within Staff's possession, custody or control.

7. Staff objects to USS's Requests to Admit insofar as they seek to require production of evidence inadmissible as the subject of compromise and settlement.

The following responses are provided subject to and without waiving these general objections, as well as the specific objections to the individual discovery requests. Subject to the aforementioned general objections, and without waiving any objection(s), Staff responds to the IAWC's USS's Requests to Admit set forth below.

Responses to Requests to Admit

Subject to, and without waiving, the objections set forth above, Staff states as follows:

Request No. 1: The portions NG Pipe B, NG Branch Pipe C, NG Branch Pipe D, NG Branch Pipe F, and NG Pipe H identified in the direct testimony of U. S. Steel witness Mr. Gregory Baker (USS Ex. 1.0) as leaving plant property and crossing a public road, street or right of way (a) are associated with the Granite City Works ("GCW") plant, meaning they are operated by plant personnel, (b) run between plant buildings, and (c) are each less than one mile in length.

Response: Staff admits that Mr. Baker so testified. Answering further, Staff lacks sufficient information to admit or deny the remainder of the facts asserted therein as true.

Staff Response to 1st Request to Admit

Request No. 2: There are no natural gas lines operated or controlled by Granite City Works that leave plant property and cross a public road, street or right of way other than the portions of NG Pipe B, NG Branch Pipe C, NG Branch Pipe D, NG Branch Pipe F, and NG Pipe H identified in the direct testimony of U. S. Steel witness Mr. Greg Baker (USS Ex. 1.0) as leaving plant property and crossing a public road, street or right of way.

Response: Staff admits that Mr. Baker so testified. Answering further, Staff lacks sufficient information to admit or deny the remainder of the facts asserted therein as true.

Request No. 3: The portions COG Pipe A, COG Branch Pipe B, COG Pipe C, COG Branch Pipe D, COG Branch Pipe E, and COG Pipe F identified in the direct testimony of U. S. Steel witness Mr. Gregory Baker (USS Ex. 1.0) as leaving plant property and crossing a public road, street or right of way (a) are associated with the Granite City Works ("GCW") plant, meaning they are operated by plant personnel, (b) run between plant buildings, and (c) are each less than one mile in length.

Response: Staff admits that Mr. Baker so testified. Answering further, Staff lacks sufficient information to admit or deny the remainder of the facts asserted therein as true.

Request No. 4: There are no coke oven gas lines operated or controlled by Granite City Works that leave plant property and cross a public road, street or right of way other than the portions of COG Pipe A, COG Branch Pipe B, COG Pipe C, COG Branch Pipe D, COG Branch Pipe E, and COG Pipe F identified in the direct testimony of U. S. Steel witness Mr. Gregory Baker (USS Ex. 1.0) as leaving plant property and crossing a public road, street or right of way.

Response: Staff admits that Mr. Baker so testified. Answering further, Staff lacks sufficient information to admit or deny the remainder of the facts asserted therein as true.

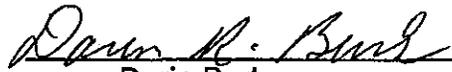
State of Illinois)
)
County of Sangamon) SS

AFFIDAVIT

The undersigned, under oath, deposes and states that he is competent to testify and that, if called upon to testify in the above captioned proceeding, he would testify as follows:

1. My name is Darin Burk. I am employed by the Illinois Commerce Commission as Manager of the Pipeline Safety Program of the Illinois Commerce Commission.
2. I have reviewed the Staff's attached Responses to the United States Steel Company's First Set of Requests to Admit.
3. The aforementioned Responses are true and accurate as of the date hereof.

Further affiant sayeth naught.


Darin Burk

Subscribed and Sworn before me
this 13th day of January, 2012



Notary Public

