

**RESPONSE TO CUB'S SECOND OF DATA REQUESTS TO
RETAIL ENERGY SUPPLY ASSOCIATION**

CUB → RESA 2.04

Reference Ms. Ringenbach's Direct Testimony at page 6, lines 114-115: "By reducing the collection costs to AGSs, AGSs can pass that savings on to customers with lower prices."

- a. Please quantify the referenced "collection costs," annually for each RESA member for the years 2010, 2011 and 2012.
- b. Please specifically describe and identify the percentage or dollar amount by which the AGSs would reduce prices by reducing collection costs.
- c. Please indicate how customers would be able to determine if and how AGSs have passed savings on to customers.
- d. Do the AGSs make a specific commitment to "pass that savings on to customers with lower prices."? If so, what is the amount by which the AGS specifically commit to reduce the offered price?

RESPONSE:

- a. RESA/IGS object to this request as vague, overly broad and burdensome.
- b. Ms. Ringenbach is not able to predict the percentage or dollar amount by which the AGS would reduce prices in Nicor Gas' service territory assuming approval of Rider 17.
- c. This request misses the point of Ms. Ringenbach's testimony. If Rider 17 is approved, more AGS will offer more products in Nicor Gas' service territory. This increased competition would result in lower prices for customers. It is not possible to quantify future savings at this time.
- d. Since it is not possible at this time to predict savings that would occur under a program that will begin approximately two years after a Commission order approving the program, it is not possible to make the commitment contemplated by this request. That said, the nature of competition is to offer better products than competitors. If one AGS does not pass through the savings, their products are likely to not be chosen over their competitors.

Responsible witness: Teresa Ringenbach

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F.C.C. DOCKET NO. 12-0569

CUB Cross Exhibit No. 1

Witness _____

Date 5-6-13 Reporter SB