

ICC Docket No. 12-0512
The Peoples Gas Light and Coke Company's Response to
Staff Data Requests ACC 2.01-2.02
Dated: August 22, 2013

REQUEST NO. ACC 2.02:

(2012 NOL Reconsideration) Referring to pp. 10-13 of the People of the State of Illinois' ("AG") Application for Rehearing, please provide full revenue requirement schedules assuming:

- a) Correction of all technical errors as proposed by the Companies; and
- b) Elimination of the 2012 Net Operating Loss deferred tax asset in rate base.

RESPONSE:

Peoples Gas notes that its position is that the elimination of the 2012 NOL would place it at risk of a tax normalization violation. The consequence of a tax normalization violation is severe and would include the loss of Peoples Gas' ability to claim accelerated depreciation in the future. The actual timing / date that Peoples Gas' property would cease to qualify for accelerated depreciation is uncertain as it would be based upon the date the IRS deems the Commission first taking an inconsistent position. As such, the quantification of any dollar impact resulting from a normalization violation has not been determined and is not reflected in the attached response.

Please see attachment PGL ACC 2.02 Attach01. The attachment contains what Peoples Gas identified as all proposed corrections and results needed to have a correct revenue requirement in light of the net operating loss. In addition, the the attachment eliminates the effects of the 2012 balance in the NOL deferred tax asset.

- a. Page 1 -Statement of Operations Income (Revenue Requirement) reflects final revenue requirement results based on all proposed corrections made
- b. Page 2 -Column h reflects proposed correction to current & deferred income taxes on non-AMRP Gas Services ratemaking adjustments to Operating Income.
- c. Page 3- Column I reflects proposed correction to current & deferred income taxes on Non-Union Wages
- d. Page 5-Rate Base Summary reflects final results based on proposed rate base corrections for Cash Working Capital and Net Operating Loss
- e. Page 10-Net Operating Loss (Rate Base) reflects proposed correction to adjustment to rate base, including the elimination of the 2012 Net Operating Loss ("NOL") deferred tax asset in rate base.
- f. Page 11-Cash Working Capital (Rate Base) reflects calculation results based on all proposed corrections made

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**The Peoples Gas Light and Coke Company's Response to
Staff Data Requests ACC 2.01-2.02**

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- g. Page 8- Interest Synchronization reflects derivative calculation results based on all proposed corrections made
- h. Page 9-Invested Capital Tax reflects derivative calculation results based on all proposed corrections made

The Peoples Gas Light and Coke Company
Statement of Operating Income with Adjustments
For the Test Year Ending December 31, 2013
(In Thousands)

Line No.	Description	Company Surrebuttal Pro Forma Present (NS-PGL Ex. 42.1P)	Adjustments (App. B, p. 4)	Pro Forma Present (Cols. b+c)	Company Surrebuttal Proposed Increase (NS-PGL Ex. 42.1P)	Gross Revenue Conversion Factor	Proposed Rates With Adjustments (Cols. d+e+f)	Adjustment To Proposed Increase	Operating Statement per Order (Cols. g+h)	Tax Effect of Order to NOL (App. B, p. 11)	Operating Statement per Order with Effect of NOL (Cols. i+j)
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
1	Base Rate Revenues	\$ 531,898	\$ -	\$ 531,898	\$ 96,996	\$ -	\$ 628,894	\$ (41,935)	\$ 586,959	\$ -	\$ 586,959
2	PGA Revenues	-	-	-	-	-	-	-	-	-	-
3	Coal Tar Revenues	-	-	-	-	-	-	-	-	-	-
4	Other Revenues	15,386	-	15,386	809	-	16,195	-	16,195	-	16,195
5	Total Operating Revenue	547,284	-	547,284	97,805	\$ -	645,089	(41,935)	603,154	-	603,154
6	Uncollectible Accounts	18,265	-	18,265	2,911	-	21,176	(1,248)	19,928	-	19,928
7	Cost of Gas	-	-	-	-	-	-	-	-	-	-
8	Other Production	1,015	(7)	1,008	-	-	1,008	-	1,008	-	1,008
9	Storage	10,302	(36)	10,266	-	-	10,266	-	10,266	-	10,266
10	Transmission	3,245	(5)	3,240	-	-	3,240	-	3,240	-	3,240
11	Distribution	144,437	(2,226)	142,211	-	-	142,211	-	142,211	-	142,211
12	Customer Accounts	32,557	(104)	32,453	-	-	32,453	-	32,453	-	32,453
13	Customer Service and Informational Service	2,274	(18)	2,256	-	-	2,256	-	2,256	-	2,256
14	Administrative and General	134,620	(2,298)	132,322	-	-	132,322	-	132,322	-	132,322
15	Depreciation and Amortization	97,208	(140)	97,068	-	-	97,068	-	97,068	-	97,068
16	Taxes Other Than Income	21,317	(246)	21,071	-	-	21,071	-	21,071	-	21,071
17	Total Operating Expense										
18	Before Income Taxes	465,240	(5,080)	460,160	2,911	-	463,071	(1,248)	461,823	-	461,823
19	State Income Tax	2,680	916	3,596	9,016	(1)	12,611	(3,865)	8,746	-	8,746
20	Federal Income Tax	-	1,251	1,251	30,057	-	31,308	(12,888)	18,420	(18,420)	-
21	Deferred Taxes and ITCs Net	17,875	(887)	16,988	-	-	16,988	-	16,988	18,420	35,408
22	Total Operating Expenses	485,795	(3,800)	481,995	41,984	(1)	523,978	(18,001)	505,977	-	505,977
23	NET OPERATING INCOME	\$ 61,489	\$ 3,800	\$ 65,289	\$ 55,821	\$ 1	\$ 121,111	\$ (23,934)	97,177		\$ 97,177
24	Rate Base (App. B, p. 5, Column (d))								\$ 1,456,963		
25	Overall Rate of Return per Order								6.67%		
26	Revenue Change (Col. (i) Line 3 minus Col. (d), Line 3)								\$ 55,870		
27	Percentage Revenue Change (Col. (i), Line 3 divided by Col. (d), Line 35)								10.21 %		

The Peoples Gas Light and Coke Company
Adjustments to Operating Income
For the Test Year Ending December 31, 2013
(In Thousands)

Line No.	Description	Interest Synchronization (App. B, p. 9)	Not Used	Not Used	Not Used	State Income Tax Impact (AG Ex 4.1 Sched C-10)	AMRP adjustments Per Order	Non-AMRP Gas (Staff Cross Exhibit 11)	Subtotal Operating Statement Adjustments
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
1	Base Rate Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2	PGA Revenues	-	-	-	-	-	-	-	-
3	Coal Tar Revenues	-	-	-	-	-	-	-	-
4	Other Revenues	-	-	-	-	-	-	-	-
5	Total Operating Revenue	-	-	-	-	-	-	-	-
6	Uncollectible Accounts	-	-	-	-	-	-	-	-
7	Cost of Gas	-	-	-	-	-	-	-	-
8	Other Production	-	-	-	-	-	-	-	-
9	Storage	-	-	-	-	-	-	-	-
10	Transmission	-	-	-	-	-	-	-	-
11	Distribution	-	-	-	-	-	-	-	-
12	Customer Accounts	-	-	-	-	-	-	-	-
13	Customer Service and Informational Services	-	-	-	-	-	-	-	-
14	Administrative and General	-	-	-	-	-	-	-	-
15	Depreciation and Amortization	-	-	-	-	-	-	(121)	(121)
16	Taxes Other Than Income	-	-	-	-	-	-	-	-
17	Total Operating Expense	-	-	-	-	-	-	-	-
18	Before Income Taxes	-	-	-	-	-	-	(121)	(121)
19	State Income Tax	445	-	-	-	-	-	(1)	444
20	Federal Income Tax	1,485	-	-	-	-	-	(2,004)	(519)
21	Deferred Taxes and ITCs Net	-	-	-	-	(2,740)	-	2,054	(686)
22	Total Operating Expenses	1,930	-	-	-	(2,740)	-	(72)	(882)
23	NET OPERATING INCOME	\$ (1,930)	\$ -	\$ -	\$ -	\$ 2,740	\$ -	\$ 72	\$ 882

Note: Company identifies proper corrections to current and deferred income tax on Non-AMRP Gas Services adjustments for to ensure proper NOL calculations:

	per Final Order	Adjust current versus deferred	Corrected
State Income Tax	11	(12)	(1)
Federal Income Tax	38	(2,042)	(2,004)
Deferred Taxes and ITCs Net	-	2,054	2,054
Total Income Tax at Effective Rate 41.175%	49	-	49

Source: PGL DLH 3.01 Attach 02 page 1, Deferred Taxes -Federal O&M \$2,042 and State O&M \$12.1

The Peoples Gas Light and Coke Company
Adjustments to Operating Income
For the Test Year Ending December 31, 2013
(In Thousands)

Line No.	Description	Subtotal (App. B, p. 2)	Not Used	Non-Union Wages (App. B, p. 19)	Not Used	Not Used	Advertising Expense Per Order	Promotional & Goodwill Per Order	Subtotal Operating Statement Adjustments
	(a)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)
1	Base Rate Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2	PGA Revenues	-	-	-	-	-	-	-	-
3	Coal Tar Revenues	-	-	-	-	-	-	-	-
4	Other Revenues	-	-	-	-	-	-	-	-
5	Total Operating Revenue	-	-	-	-	-	-	-	-
6	Uncollectible Accounts	-	-	-	-	-	-	-	-
7	Cost of Gas	-	-	-	-	-	-	-	-
8	Other Production	-	-	(7)	-	-	-	-	(7)
9	Storage	-	-	(36)	-	-	-	-	(36)
10	Transmission	-	-	(5)	-	-	-	-	(5)
11	Distribution	-	-	(226)	-	-	-	-	(226)
12	Customer Accounts	-	-	(104)	-	-	-	-	(104)
13	Customer Service and Informational Se	-	-	(18)	-	-	-	-	(18)
14	Administrative and General	-	-	(206)	-	-	-	-	(206)
15	Depreciation and Amortization	(121)	-	(19)	-	-	-	-	(140)
16	Taxes Other Than Income	-	-	(53)	-	-	-	-	(53)
17	Total Operating Expense	(121)	-	(674)	-	-	-	-	(795)
18	Before Income Taxes	(121)	-	(674)	-	-	-	-	(795)
19	State Income Tax	444	-	65	-	-	-	-	509
20	Federal Income Tax	(519)	-	413	-	-	-	-	(106)
21	Deferred Taxes and ITCs Net	(686)	-	(201)	-	-	-	-	(887)
22	Total Operating Expenses	(882)	-	(397)	-	-	-	-	(1,279)
23	NET OPERATING INCOME	\$ 882	\$ -	\$ 397	\$ -	\$ -	\$ -	\$ -	\$ 1,279

Note: Company identifies proper corrections to current and deferred income tax on Non-Union Wage adjustments for to ensure proper NOL calculations:

	per Final Order	Adjust current versus deferred	Corrected
State Income Tax	64	1	65
Federal Income Tax	213	200	413
Deferred Taxes and ITCs Net	-	(201)	(201)
Total Income Tax at Effective Rate 41.175%	277	-	277

The Peoples Gas Light and Coke Company
Adjustments to Operating Income
For the Test Year Ending December 31, 2013
(In Thousands)

Line No.	Description	Subtotal (App. B, p. 3)	Charitable Contributions (App. B, p. 17)	IBS Intercompany Charges (AG Ex 4.1, Sch. C-8)	Invested Capital Tax (App. B, p. 11)	Not Used	Plastic Pipe Fitting Remediation (Staff Ex. 16.0)	Cross Bore Expenses (Per Order)	Total Operating Statement Adjustments
	(a)	(r)	(s)	(t)	(u)	(v)	(w)	(x)	(y)
1	Base Rate Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2	PGA Revenues	-	-	-	-	-	-	-	-
3	Coal Tar Revenues	-	-	-	-	-	-	-	-
4	Other Revenues	-	-	-	-	-	-	-	-
5	Total Operating Revenue	-	-	-	-	-	-	-	-
6	Uncollectible Accounts	-	-	-	-	-	-	-	-
7	Cost of Gas	-	-	-	-	-	-	-	-
8	Other Production	(7)	-	-	-	-	-	-	(7)
9	Storage	(36)	-	-	-	-	-	-	(36)
10	Transmission	(5)	-	-	-	-	-	-	(5)
11	Distribution	(226)	-	-	-	-	(2,000)	-	(2,226)
12	Customer Accounts	(104)	-	-	-	-	-	-	(104)
13	Customer Service and Informational S	(18)	-	-	-	-	-	-	(18)
14	Administrative and General	(206)	(7)	(2,085)	-	-	-	-	(2,298)
15	Depreciation and Amortization	(140)	-	-	-	-	-	-	(140)
16	Taxes Other Than Income	(53)	-	-	(193)	-	-	-	(246)
17	Total Operating Expense								
18	Before Income Taxes	(795)	(7)	(2,085)	(193)	-	(2,000)	-	(5,080)
19	State Income Tax	509	1	198	18	-	190	-	916
20	Federal Income Tax	(106)	2	660	61	-	634	-	1,251
21	Deferred Taxes and ITCs Net	(887)	-	-	-	-	-	-	(887)
22	Total Operating Expenses	(1,279)	(4)	(1,227)	(114)	-	(1,176)	-	(3,800)
23	NET OPERATING INCOME	\$ 1,279	\$ 4	\$ 1,227	\$ 114	\$ -	\$ 1,176	\$ -	\$ 3,800

The Peoples Gas Light and Coke Company
Rate Base
For the Test Year Ending December 31, 2013
(In Thousands)

Line No.	Description	Company Surrebuttal Pro Forma Rate Base (NS-PGL Ex. 43.1P)	Adjustments (App. B, p. 7)	Approved Rate Base (Col. b+c)
	(a)	(b)	(c)	(d)
1	Gross Utility Plant	\$ 3,254,228	(157,145)	3,097,083
2	Accumulated Provision for Depr. & Amort.	(1,223,463)	31,846	(1,191,618)
3	-	-	-	-
4	Net Plant	2,030,765	(125,300)	1,905,466
5	Additions to Rate Base			
6	Cash Working Capital	20,442	(3,577)	16,865
7	Materials and Supplies	12,002	-	12,002
8	Gas in Storage	54,843	-	54,843
9	Retirement Benefits, Net	49,017	(63,210)	(14,193)
10	Budget Plan Balances	8,314	-	8,314
11	-	-	-	-
12	-	-	-	-
13	-	-	-	-
14	-	-	-	-
15	-	-	-	-
16	Deductions From Rate Base			
17	Accumulated Deferred Income Taxes	(477,700)	(10,092)	(487,792)
18	Customer Deposits	(27,453)	-	(27,453)
19	Customer Advances for Construction	(2,012)	-	(2,012)
20	Reserve for Injuries and Damages	(8,947)	(130)	(9,077)
21	-	-	-	-
22	-	-	-	-
23	Rate Base	<u>\$ 1,659,271</u>	<u>(202,308)</u>	<u>1,456,963</u>

The Peoples Gas Light and Coke Company
Adjustments to Rate Base
For the Test Year Ending December 31, 2013
(In Thousands)

Line No.	Description	Cash Working Capital (App. B, p. 13)	Average Rate Base (App. B, p. 16)	Non-AMRP Gas (Staff Cross Exhibit 11)	AMRP adjustments Per Order	Net Operating Loss (App. B, p. 12, col (D), line 5)	Non-Union Wages (App. B, p. 19)	Pension Asset (Staff Ex. 14.0, Sch. 14.01 P)	Subtotal Rate Base Adjustments
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
1	Gross Utility Plant	\$ -	\$ (151,242)	\$ (5,857)	\$ -	\$ -	\$ (46)	\$ -	\$ (157,145)
2	Accumulated Provision for Depr. & Amort.	-	31,714	122	-	-	10	-	31,846
3		-	-	-	-	-	-	-	-
4	Net Plant	-	(119,528)	(5,736)	-	-	(36)	-	(125,300)
5	Additions to Rate Base								-
6	Cash Working Capital	(3,577)	-	-	-	-	-	-	(3,577)
7	Materials and Supplies	-	-	-	-	-	-	-	-
8	Gas in Storage	-	-	-	-	-	-	-	-
9	Retirement Benefits, Net	-	20,496	-	-	-	-	(83,706)	(63,210)
10	Budget Plan Balances	-	-	-	-	-	-	-	-
11		-	-	-	-	-	-	-	-
12		-	-	-	-	-	-	-	-
13		-	-	-	-	-	-	-	-
14		-	-	-	-	-	-	-	-
15		-	-	-	-	-	-	-	-
16	Deductions From Rate Base								-
17	Accumulated Deferred Income Taxes	-	3,474	(326)	-	(47,807)	(72)	33,269	(11,462)
18	Customer Deposits	-	-	-	-	-	-	-	-
19	Customer Advances for Construction	-	-	-	-	-	-	-	-
20	Reserve for Injuries and Damages	-	(130)	-	-	-	-	-	(130)
21		-	-	-	-	-	-	-	-
22		-	-	-	-	-	-	-	-
23	Rate Base	\$ (3,577)	\$ (95,688)	\$ (6,061)	\$ -	\$ (47,807)	\$ (108)	\$ (50,437)	\$ (203,678)

The Peoples Gas Light and Coke Company
Interest Synchronization Adjustment
For the Test Year Ending December 31, 2013
(In Thousands)

Line No.	Description	Amount
	(a)	(b)
1	Rate Base	\$ 1,456,963 (1)
2	Weighted Cost of Debt	1.99% (2)
3	Synchronized Interest Per Order	28,994
4	Company Interest Expense	<u>33,683</u> (3)
5	Increase (Decrease) in Interest Expense	<u>(4,689)</u>
6	Increase (Decrease) in State Income Tax Expense	
7	at 9.500%	<u>\$ 445</u>
8	Increase (Decrease) in Federal Income Tax Expense	
9	at 35.000%	<u>\$ 1,485</u>

(1) Source: App. B, p. 5, Column D.
(2) Source: Per Order
(3) Source: NS-PGL Ex. 42.2P, p. 6

The Peoples Gas, Light and Coke Company
Adjustment For Invested Capital Taxes
For the Test Year Ending December 31, 2013
(In Thousands)

Line (A)	Description (B)	Amount (C)	Source (D)
1	Rate Base	\$ 1,456,963	App. B, p. 1, col. i, line 24
2	Rate of Return	<u>6.67%</u>	App. B, p. 1, col. i, line 25
3	Operating Income Required	\$ 97,177	Line 1 x Line 2
4	Pro forma operating income at present rates adjusted before ICT adjustment	<u>65,482</u>	App. B, p. 1, col. d line 23 - App. B, p. 4, col. u line 16
5	Operating Income Additional Allowed	\$ 31,695	Line 3 - line 4
6	Invested Capital Tax Rate	<u>0.80%</u>	PGL Schedule WPC-2.14
7	Incremental Invested Capital Tax Impact per Order	\$ 254	Line 5 x line 6
8	Incremental Invested Capital Tax Impact per Company	<u>447</u>	NS-PGL Ex. 42.2 P, p. 5
9	Adjustment	<u><u>\$ (193)</u></u>	Line 7 - line 8

The Peoples Gas, Light and Coke Company
Adjustment For Revenue Increase Impact on Net Operating Loss
For the Test Year Ending December 31, 2013
(In Thousands)

Line (A)	Description (B)	Year End Rate Base including 2012 NOL Amount (C)	Final Order Average Rate Base including 2012 NOL Amount (D)	ACC 2.02 Average Rate Base EXCLUDING 2012 NOL Amount (D)	Source (E)
1	Net Operating Loss Deferred Tax Asset per Company Surrebuttal	\$ 66,341	\$ 52,469	\$ 13,872	See Note (1)
2	Effect of Revenue Increase*	<u>(20,598)</u>	<u>(20,598)</u>	<u>(9,210)</u>	PGL ACC 2.02 Attach 01, p. 1, col. (j) line 20 * 50%. See Note (1)
3	Net Operating Loss Deferred Tax Asset per Staff	\$ 45,743	\$ 31,871	4,662	Line 1 + line 2 See Note (1)
4	Adjustment to Rate Base- Deferred Tax Asset at Year End	<u>\$ (20,598)</u>			Line 2
5	Adjustment to Rate Base- Deferred Tax Asset at Average		<u>\$ (34,470)</u>	<u>\$ (47,807)</u>	Line 3 col. (D) - line (1) col. [C] See Note (1) lines 4 and 6

Note (1)

	ACC 2.02 Average Rate Base	
1 PGL Surrebuttal - Year End Rate Base 2013	66,341	Line 1, col (C)
2 PGL Surrebuttal Average RB Adjustment	<u>\$ (13,872)</u>	Line 1, col (D) minus Line 1, col (C)
3 NOL Converted to PGL Surrebuttal Average RB -includes 2012 NOL	\$ 52,469	Line 1, col (D)
4 Remove Company Surrebuttal 2012 NOL RB	<u>\$ (38,597)</u>	PGL ACC 1.03 Attach 01
5 Adjusted PGL Surrebuttal Average RB excluding 2012 NOL	\$ 13,872	2012 NOL \$0 + PGL Surrebuttal 2013 activity \$27,744 = \$27,744 divide by 2
6 Average Adj for Increase in FIT - current - due to Rate Increase	<u>(9,210)</u>	ACC 2.02 Average Rate Base line 2, col (D)
7 Final Order NOL with Average RB and including Impact of Rate Increase	<u>\$ 4,662</u>	ACC 2.02 Average Rate Base line 3, col (D).
8 without 2012 NOL		

The Peoples Gas Light and Coke Company
Cash Working Capital Adjustments
For the Test Year Ending December 31, 2013
(In Thousands)

Line No. (A)	Item (B)	Amount (C)	Lag (Lead) (D)	CWC Factor (D) / 365 (E)	CWC Requirement (C) x (E) (F)	Column (C) Source (G)
1	Revenues	\$ 874,176	49.59	0.13586	\$ 118,768	App. B, p. 14, Line 7
2	ICC Gas Revenue Tax	\$ 1,058	49.59	0.13586	\$ 144	Line 22 Below
3	Pass Through Taxes	160,721	0.00	0.00000	-	Sum of lines 23 - 25 below
4	Total	<u>\$ 1,035,955</u>			<u>\$ 118,912</u>	Line 1 + Line 2 + Line 3
5	Payroll and Withholdings	\$ 73,547	(14.30)	(0.03918)	(2,881)	App. B, p. 15, Line 3
6	Incentive Pay	2,126	(250.50)	(0.68630)	(1,459)	NS-PGL Ex. 27.10P, p. 1, Line 5
7	Inter Company Billings	147,603	(35.23)	(0.09652)	(14,247)	App. B, p. 15, Line 12
8	Natural Gas	473,189	(40.48)	(0.11090)	(52,479)	NS-PGL Ex. 27.10P, p. 1, Line 7
9	Pension and OPEB	35,811	(35.23)	(0.09652)	(3,456)	NS-PGL Ex. 27.10P, p. 1, Line 8
10	Other Benefits	13,896	(40.31)	(0.11044)	(1,535)	NS-PGL Ex. 27.10P, p. 1, Line 9
11	Other Operations and Maintenance	53,989	(43.63)	(0.11953)	(6,454)	App. B, p. 14, Line 21
12	Federal Insurance Contributions (FICA)	4,676	(16.29)	(0.04463)	(209)	App. B, p. 15, Line 9
13	Federal Unemployment Tax	18	(60.88)	(0.16679)	(3)	NS-PGL Ex. 27.10P, p. 1, Line 13
14	State Unemployment Tax	250	(71.33)	(0.19542)	(49)	NS-PGL Ex. 27.10P, p. 1, Line 14
15	Property/Real Estate Taxes	1,078	(373.16)	(1.02236)	(1,102)	NS-PGL Ex. 27.10P, p. 1, Line 15
16	Invested Capital Tax	11,165	(30.38)	(0.08323)	(929)	App. B, p. 15, Line 6
17	Corporation Franchise Tax	219	(185.95)	(0.50945)	(112)	NS-PGL Ex. 27.10P, p. 1, Line 17
18	Sales, Use and Accelerated Tax	181	(20.11)	(0.05510)	(10)	NS-PGL Ex. 27.10P, p. 1, Line 18
19	Federal Excise Tax	59	(76.38)	(0.20926)	(12)	NS-PGL Ex. 27.10P, p. 1, Line 19
20	Chicago Employer's Expense Tax	65	(60.82)	(0.16663)	(11)	NS-PGL Ex. 27.10P, p. 1, Line 20
21	Unauthorized Insurance Tax	144	155.18	0.42515	61	NS-PGL Ex. 27.10P, p. 1, Line 21
22	ICC Gas Revenue Tax	1,058	34.59	0.09477	100	NS-PGL Ex. 27.10P, p. 1, Line 23
23	Gross Receipts/Municipal Utility Tax	84,618	(24.20)	(0.06630)	(5,610)	NS-PGL Ex. 27.10P, p. 1, Line 24
24	Energy Assistance Charges	9,690	(18.36)	(0.05030)	(487)	NS-PGL Ex. 27.10P, p. 1, Line 25
25	IDOR Gas Revenue/Public Utility Tax	34,771	10.63	0.02912	1,013	NS-PGL Ex. 27.10P, p. 1, Line 26
26	City of Chicago Gas Use tax	31,642	(24.31)	(0.06660)	(2,107)	NS-PGL Ex. 27.10P, p. 1, Line 27
27	Interest Expense	28,994	(91.25)	(0.25000)	(7,249)	App. B, p. 9, line 3
28	Federal Income Tax	18,420	(37.88)	(0.10378)	(1,912)	App. B, p. 1, col. (i), line 20
29	State Income Tax	8,746	(37.88)	(0.10378)	(908)	App. B, p. 1, col. (i), line 19
30	Total	<u>\$ 1,035,955</u>			<u>\$ (102,047)</u>	Sum of Lines 4 through 29
31	Cash Working Capital per Order				\$ 16,865	Line 4 + Line 30
32	Cash Working Capital per Company				<u>20,442</u>	NS-PGL Ex. 43.10P, p. 1, Line 4
33	Difference -- Adjustment				<u>\$ (3,577)</u>	Line 31 - Line 32

Note: Lag (Lead) is from NS-PGL Ex. 27.10P, p. 1; except for lines 2 and 8
Line 2 lag: ICC Staff Ex. 12.0, p. 17
Line 8 lead: Staff Data Request DGK-13.03