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ILLINOIS COMMERCE COMMISSION
STAFF DATA REQUEST

Utility Company: AQUA ILLINOIS, INC.

Docket No. 14-0419

Date Submitted: 8/26/14

Submitted By: Melissa Kahoun, Area Manager of the Kankakee and Will County
Divisions of Aqua Illinois, Inc.
(815) 614-2032 ext. 59032

- DAS 4.03 Regarding Aqua Illinois' response to Staff DR DAS 3.01h and the confidential attachment to Aqua Illinois's response to DAS 1.01, please provide the following information.
- a. When did Aqua Resources first begin managing the contract with HomeServe?
 - b. Does Aqua Resources track all costs related to its services to HomeServe?
 - c. Do Aqua Resources and Aqua Services Inc. have employees in common? If so, are any that manage the contract for HomeServe from the same as those that perform services for Aqua Illinois? Further, if the two entities have common employees, how does Aqua America differentiate between time spent on HomeServe from that time spent for Aqua Illinois and its regulated affiliates?
 - d. Do Aqua Resources and Aqua Services Inc. have facilities in the same building? How does Aqua America or its subsidiaries differentiate between costs for Aqua Resources and Aqua Services Inc.?
 - e. Does Aqua Resources perform services for any non-regulated affiliates?
 - f. Does Aqua Resources perform services for any non-affiliates other than HomeServe?
 - g. Has any Aqua America subsidiary ever performed Call Transfer Services for HomeServe? If yes, please explain how these costs are paid for by HomeServe or otherwise excluded from allocations to Aqua Illinois.
 - h. Has any Aqua America subsidiary ever performed Utility Billing Services for HomeServe? If yes, please explain how these costs are paid for by HomeServe or otherwise excluded from allocations to Aqua Illinois.
 - i. Has any Aqua America subsidiary ever performed bill insert services for HomeServe? If yes, please explain how these costs are paid for by HomeServe or otherwise excluded from allocations to Aqua Illinois.

- j. Has any Aqua America subsidiary ever provided to call service staff any customer service training about HomeServe products or services? If yes, please explain how these costs are paid for by HomeServe, or otherwise excluded from allocations to Aqua Illinois.
- k. What entity provides Customer Data to HomeServe?
- l. What entity provides Customer Data to Aqua Resources?
- m. What entity provided Aqua Illinois Customer Data to Aqua Resources? How was this authorized?

RESPONSE:

- a. Aqua Illinois objects to this data request to the extent it seeks information not relevant to this proceeding. Subject to and without waiving this objection, Aqua Illinois states:

Aqua Resources began managing the contract with HomeServe USA in 2009.

- b. Aqua Illinois objects to this data request to the extent it seeks information not relevant to this proceeding. Subject to and without waiving this objection, Aqua Illinois states:

Yes, Aqua Resources tracks all costs related to its services to HomeServe USA.

- c. Aqua Illinois objects to this data request to the extent it seeks information not relevant to this proceeding. Subject to and without waiving this objection, Aqua Illinois states:

Aqua Resources and Aqua Services, Inc. do not have employees in common.

- d. Aqua Illinois objects to this data request to the extent it seeks information not relevant to this proceeding. Subject to and without waiving this objection, Aqua Illinois states:

Yes, Aqua Resources and Aqua Services have facilities in the same building. Costs are charged directly and coded to separate accounting units.

- e. Aqua Illinois objects to this data request to the extent it seeks information not relevant to this proceeding.

- f. Aqua Illinois objects to this data request to the extent it seeks information not relevant to this proceeding.

- g. Aqua Illinois objects to this data request to the extent it seeks information not relevant to this proceeding. Subject to and without waiving this objection, Aqua Illinois states:

No Aqua America subsidiary has ever performed Call Transfer Services for HomeServe USA.

- h. Aqua Illinois objects to this data request to the extent it seeks information not relevant to this proceeding. Subject to and without waiving this objection, Aqua Illinois states:

No Aqua America subsidiary has ever performed Utility Billing Services for HomeServe USA.

- i. Aqua Illinois objects to this data request to the extent it seeks information not relevant to this proceeding. Subject to and without waiving this objection, Aqua Illinois states:

No Aqua America subsidiary has ever performed bill insert services for HomeServe USA.

- j. Please see Aqua Illinois' response to DAS 3.01(o).

- k. Aqua Illinois objects to this data request to the extent it seeks information not relevant to this proceeding, and to the extent that it seeks information that is not in the possession of Aqua Illinois. Subject to and without waiving these objections, Aqua Illinois states:

Aqua Illinois does not have knowledge regarding HomeServe USA's customer data collection process. As previously stated in Aqua Illinois' responses to DAS 1.01 and DAS 1.04, HomeServe USA no longer obtains customer data from any Aqua America affiliate.

- l. Please see Aqua Illinois' response to DAS 4.03(k).

- m. Please see Aqua Illinois' response to DAS 3.02(b)

Witness: Melissa Kahoun

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HomeServe USA®

Plans for 60901

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Repair Plans

Repair Plans Available for ZIP Code : 60901, Kankakee, IL

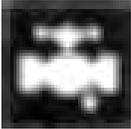
All

Plumbing

Electrical

Heating & Cooling

Plumbing Repair Plans Available for ZIP Code : 60901, Kankakee, IL



Read Reviews

Water Service Line Coverage

Term: ~~6.5~~ \$5.99/mo.

[Add Plan](#)

As your home gets older, so does the exterior water service line that brings fresh water to your house. If this line fails, repair or replacement can be expensive and most basic homeowners insurance doesn't cover repairs to the line on your property. There's no way to prevent a water service line emergency, but you can be prepared with affordable Water Service Line Coverage. [Learn More >](#)

Repair Plan Details ▾

In partnership with:
Aqua

AQUA

For just \$5.99/month, you get:

Repair Plan Benefits:

- \$7,000 annual benefit amount
- 30-day wait period with a money-back guarantee
- 2 service calls (\$3,500 per call)
- Basic property restoration

What's Covered:

- Locating the leak
- Excavation to expose pipe
- Pipe replacement or repair
- Repair or replacement of seals and joints
- Unblocking
- Fitting external valves
- Fusing
- Welding
- Pipe cutting
- Backfilling of areas disturbed by repair

Exclusions

Repair to any exterior water service line that branches off the main line.

[Read Reviews](#)

LeakGuard® Coverage

Term **\$6.49/mo.**

[Add Plan](#)

As your home gets older, so does the exterior water service line that brings fresh water to your house. If this line fails, repair or replacement can be expensive and most basic homeowners insurance doesn't cover repairs to the line on your property. There's no way to prevent a water service line emergency, but you can be prepared with affordable LeakGuard® Coverage with unlimited coverage plus hotel and kennel costs should you need to relocate during the repair. [Learn More >](#)

[Repair Plan Details](#) ▼

In partnership with
Aqua **AQUA**

For just \$6.49/month, you get:

Repair Plan Benefits:

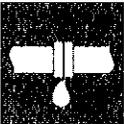
- Unlimited annual benefit
- 30-day wait period with a money-back guarantee
- Unlimited service calls
- Basic property restoration, hotel costs up to \$1,250 and kennel costs up to \$250 for dogs and \$250 for cats should you have to temporarily relocate while repairs are made

What's Covered:

- Locating the leak
- Excavation to expose pipe
- Pipe replacement or repair
- Repair or replacement of seals and joints
- Unblocking
- Fitting external valves
- Fusing
- Welding
- Pipe cutting
- Backfilling of areas disturbed by repair

Exclusions

Repair to any exterior water service line that branches off the main line.



[Read Reviews](#)

Sewer/Septic Line Coverage

Term **\$9.49/mo.**

[Add Plan](#)

The buried sewer/septic line on your property that carries waste away from your home can age, crack or leak due to simple wear and tear, tree roots or shifting ground. This line can also get blocked and cause waste water to backup into your home. Get protection from time-consuming and expensive repair costs with Sewer/Septic Line Coverage and keep what's underground covered. [Learn More >](#)

Repair Plan Details ▼

In partnership with: **AQUA**

For just \$9.49/month, you get:

Repair Plan Benefits:

- \$7,000 annual benefit amount
- 30-day wait period with a money-back guarantee
- 2 service calls (\$3,500 per call)

What's Covered:

- Locating the blockage or collapse
- Excavation to expose pipe
- Pipe replacement or repair
- Repair or replacement of seals and joints
- Unblocking
- Fitting external valves
- Fusing
- Welding
- Pipe cutting
- Backfilling of areas disturbed by repairs

Exclusions

Septic tank, leaching field, sump pump.



Read Reviews

Sewer/Septic Line Plus Coverage

For just \$10.49/month.

[Add Plan](#)

The buried sewer/septic line on your property that carries waste away from your home can age, crack or leak due to simple wear and tear, tree roots or shifting ground. This line can also get blocked and cause waste water to backup into your home. Get protection from time-consuming and expensive repair costs with Sewer/Septic Line Plus Coverage and keep what's underground covered. [Learn More >](#)

Repair Plan Details ▼

In partnership with: **AQUA**

For just \$10.49/month, you get:

Repair Plan Benefits:

- \$10,000 annual benefit amount
- 30-day wait period with a money-back guarantee
- 2 service calls (\$5,000 per call)
- Basic property restoration, hotel costs up to \$1,250 and kennel costs up to \$250 for dogs and \$250 for cats should you have to temporarily relocate while repairs are made

What's Covered:

- Locating the blockage or collapse
- Excavation to expose pipe
- Pipe replacement or repair
- Repair or replacement of seals and joints
- Unblocking
- Fitting external valves
- Fusing
- Welding
- Pipe cutting
- Backfilling of areas disturbed by repairs

Exclusions

Septic tank, leaching field, sump pump.



Read Reviews

Internal Plumbing & Drainage Coverage

Te \$10.49/mo.

Add Plan

There is a complex plumbing system inside your home. Pipes and drains can get blocked due to sediment build up, clogs can occur from grease and other materials, and plumbing fixtures can corrode and become brittle with age. When an unexpected plumbing repair is needed, you need qualified help before water damage occurs. Keep your pipes drained and not your bank account with affordable Internal Plumbing & Drainage Coverage. [Learn More >](#)

Repair Plan Details ▼

In partnership with: **AQUA**

For just \$10.49/month, you get:

Repair Plan Benefits:

- \$5,000 annual benefit amount
- 30-day wait period with a money-back guarantee
- 2 service calls (\$2,500 per call)

What's Covered:

- Leaking water pipes
- Blocked and/or overflowing toilets
- Overflowing blocked sinks
- Broken water valves
- Burst water service line under the property
- Burst or blocked sewer drain under the property

Exclusions

Fittings, fixtures, water tanks, water heaters, radiators, bathroom fittings, toilets, baths, shower pans and sinks.



Drainage Coverage

Te \$10.49/mo.

Add Plan

The drainage system in and around your home is a complex network of pipes, fittings, valves and drains that can be expensive to fix. With Drainage Coverage, you can protect yourself from the high cost of emergency repairs to your interior drainage line and exterior sewer/septic line. [Learn More >](#)

Repair Plan Details ▼

In partnership with: AQUA

For just \$10.49/month, you get:

Repair Plan Benefits:

- \$7,000 annual benefit amount
- 30-day wait period with a money-back guarantee
- 2 service calls (\$3,500 per call)

What's Covered:

- Internal Drainage Systems
- External Sewer/Septic Lines
- Drain jetting or rodding to clear blockage
- Relining of cracked drain
- Locating the blockage or collapse
- Rebuilding of collapsed drain

Exclusions

Fittings, fixtures, water tanks, water heaters, radiators, bathroom fittings, toilets, baths, shower pans and sinks, septic tank, leaching field, sump pump.

Electrical Repair Plans Available for ZIP Code : 60901, Kankakee, IL



Read Reviews

Electrical Emergency & Breakdown Coverage

Term: \$6.49/mo.

Add Plan

Old or faulty wiring can cause many problems around your house, such as failed electrical outlets, sockets and fittings, breaker panels and fuse boxes. These emergency repairs can be costly and are not covered by basic homeowners insurance policies. Power up your protection against indoor wiring breakdowns with Electrical Emergency & Breakdown Coverage that keeps you grounded against safety issues and costs. [Learn More >](#)

Repair Plan Details ▼

In partnership with: AQUA

For just \$6.49/month, you get:

Repair Plan Benefits:

- \$4,000 annual benefit amount
- 30-day wait period with a money-back guarantee
- 2 service calls (\$2,000 per call)

What's Covered:

- Distribution center (panel or fuse box)
- Faulty wiring to wall light
- Faulty or damaged electrical outlet
- Broken light switch
- Faulty or damaged GFCI outlet
- Faulty wiring to exhaust fan
- Other qualifying repairs to the wiring that carries electricity to points of use in your home

Exclusions

Failure arising from the disconnection from or interruption to the main electrical supply; replacement of light bulbs, light fittings, fuses or plugs; appliances or equipment; transformers; and service entrance conductors.

Heating & Cooling Repair Plans Available for ZIP Code : 60901, Kankakee, IL



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Cooling System Repair Plan

Ter \$11.49/mo.

[Add Plan](#)

A lot can go wrong with your central A/C system. Drains can clog, motors can burn out, fuses can blow and improper settings can mean your system runs too often, leading to higher energy costs and unnecessary wear and tear. Don't sweat high repair costs with Cooling System Repair Plan. [Learn More >](#)

Repair Plan Details ▼

In partnership with: **AQUA**

For just \$11.49/month, you get:

Repair Plan Benefits:

- \$1,750 annual benefit amount
- 30-day wait period with a money-back guarantee
- Unlimited service calls

What's Covered:

- Capacitors and circuit boards
- Internal fuses or breakers
- Condensate pumps
- Condenser motor and fan
- Contactors switches and delay timer
- Fan controls, relays and filter dryer
- High and low pressure switches
- Limit controls
- Refrigerant (excluding maintenance recharges)
- Relays, transformers and valves

Exclusions

Air ducts; A/C coils; registers; grills; asbestos coverings; balancing of system; wiring and parts external to the unit; compressors or chillers; condenser casings; condenser coils; evaporator coils; metering systems/TXV valves; thermostats or thermostat wiring; systems exceeding five tons capacity; systems that use refrigerant other than R-22 or similar, R-410A or have non-compliant components; ammonia cooling systems; rooftop, window, through-the-wall and hanging units; geothermal heat pumps; and combination ambient heat/domestic hot water heating units.



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Heating System Repair Plan

Ter \$11.49/mo.

[Add Plan](#)

If your heating system suddenly fails in the middle of winter, you could face many long, cold nights and days trying to find reliable repair help in the busy winter months. Don't get left out in the cold. Get affordable Heating System Repair Plan; a solution that you'll warm up to. [Learn More >](#)

Repair Plan Details ▼

In partnership with: **AQUA**

For just \$11.49/month, you get:

Repair Plan Benefits:

- \$1,750 annual benefit amount
- 30-day wait period with a money-back guarantee
- Unlimited service calls

What's Covered:

- Air scoops and aquastat
- Barometric damper
- Belts, pulleys and ECO safeties
- Blower motors and assembly
- Circuit boards and circulators
- Fan and limit controls
- Fusible links and gas valves
- Ignition controls and induced draft motor
- Blower and low water cutoff
- Main and pilot burners
- Pilots and thermocouples
- Pressure switch and regulator valves
- Relays, spill switches and transformers

Exclusions

Air ducts; registers; oil filters; zoning components and electronics; electronic air cleaners; humidifiers; thermostats; air balancing; chimney maintenance or repairs; heating jacket, asbestos or other insulation; heat exchangers; leaking boilers; boiler distribution piping; radiators; furnaces or boilers rated at inputs of 400,000 BTU/HR or more; rooftop, through-the-wall and hanging units; space heaters; heat pumps; combination ambient heat/domestic hot water heating; and oil units.

HomeServe USA Repair Management Corp. (HomeServe) is an *independent company separate from Aqua America* and offers this optional service as an authorized representative for AMT Warranty Corp., the contract issuer. Your choice of whether to participate in this service plan will not affect the price, availability or terms of service from Aqua.

YOUR CART

0 Items

Why Choose HomeServe USA?

- 1.6 million homeowners covered
- \$0 deductible
- Local, licensed and insured technicians
- 1-year guarantee on all covered repairs
- 30-day money-back guarantee

HomeServe USA Repair Management Corp. (HomeServe) is an *independent company separate from Aqua America*.



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