

ICC Docket No. 14-0496
Joint Applicants' Response to
Illinois Attorney General's Third Set of Data Requests AG 3.01-3.06
Dated: October 7, 2014

REQUEST NO. AG 3.02:

Referring to the response to Staff Data Request ENG 1.23, please provide any study, analysis, or other documentation establishing that the indicated headcounts for Peoples Gas and North Shore are sufficient to provide safe and reliable gas distribution service.

RESPONSE:

The FTE levels for Peoples Gas and North Shore stated in the Joint Applicants' response to Staff data request 1.23 do not represent the post-merger "headcounts" forecasted for Peoples Gas and North Shore. As explained in the Joint Applicants' responses to Staff data requests ENG 3.04 and DGK 3.01, for purposes of what levels of FTEs the Joint Applicants forecast and plan for there to be in place at Peoples Gas and North Shore in the years 2015 and 2016, the Joint Applicants adopt the levels of FTEs forecasted by Peoples Gas and North Shore in their pending rate cases (Docket Nos. 14-0224/14-0225 consol.), which are the FTE levels for Peoples Gas and North Shore provided in the Joint Applicants' responses to Staff data requests ENG 1.14 and ENG 1.20, respectively. The Joint Applicants state that these levels of FTEs for Peoples Gas and North Shore will be sufficient to provide safe and reliable gas distribution service for the customers of those utilities for the reasons provided in the record of Docket Nos. 14-0224/14-0225 consol.