Issue ID	Initiator	Title	Due Date	Completion Date	Status	Assigned To	Action Updates/Solutions	Description	PWC Recommendation Number
278	[redacted]	AMRP roles and responsibilities of the Shop construction management teams	03/30/2012	07/10/2014	Closed	[redacted]	7/10/2014: Job descriptions and major roles & responsibilities for shop personnel have been developed and will continue to be modified as the Capital construction Process continues to mature with organizational change 3/13/13: Final draft is in [redacted] s hands. Planning to close this item later this week. 1/30/13: Reported as nearly complete. Update forecast to 2/28/13. 11/30/12: In progress. Moved forecast to end of 2012. Agree. [redacted] can revamp the existing Roles & Responsibility document with Operations to gain further clarity. [redacted] s can support the Change Management associated with any changes associated with the interface. 6/27/12 [redacted] is working on developing a RACI chart that will be discussed with PGL Operations as part of the PGL realignment initiative.	Confirm the AMRP specific roles and responsibilities of the Shop construction management teams. Some of the AMRP specific tasks currently handled by shop management were not originally planned to be (e.g., managing service installs). We recommend project leadership formally identify the AMRP specific tasks to be performed by shop teams, and consider additional engineering and project administration support for shops if additional AMRP tasks remain the responsibility of the shop personnel.	3.1.1
279	[redacted]	AMRP Union Craft Levels	03/30/2012	09/08/2014	Closed	[redacted]	9/8/2014: Shop resources are being loaded into the Long term schedule to access requirements so that labor leveling and management can be forecast 3/13/13: [redacted] has a draft analysis complete. Now needs to review and send for comments. 1/30/13: [redacted] working on this. Update forecast to 2/28/13. 11/30/12: In progress. Moved forecast to end of 2012. Assume craft is PGL 18007. [redacted] along with Construction Management/Project Controls can audit labor and work with Operations to plan their resources to the overall Integrated Project Plan. [redacted] will continue work with 18007 Leadership on Labor shortages.	Assess field craft hours spent on current AMRP progress and forecast craft levels needed when progress meets that planned. Formally address any shortfalls.	3.1.1
280	[redacted]	2011 Rider Reconciliation	03/30/2012	06/29/2012	Closed	[redacted]	6/29/12: The ICC has issued final remand of Rider ICR. Final reconciliation and refund amount have been agreed to. All Rider ICR activity and actions can be suspended. 4/25/2012: Rider ICR is expected to be withdrawn per the Court's final opinion and remand to the Commission. The remand proceeding is currently underway with a simple reconciliation methodology proposed by the Company being reviewed and considered by parties in the remand proceeding. Agreed. [redacted] and staff planning for 3/2012 Reconciliation.	Continue to prepare for the 2011 Rider reconciliation despite the uncertainty surrounding the Rider's future.	3.2.1
281	[redacted]	Schedule of Values 2012	03/30/2012	04/11/2012	Closed	[redacted]	4/12/12: CLOSED. 2012 Rider/Non-Rider breakdown not required per 4/11/12 decision of accounting sub-team. If it is required in the future, the engineering group will be the ones to perform the analysis (as recommended). Engineering clearly marking Rider/Non-Rider on the design drawings and will have the input into the SOV for each project. [redacted] & [redacted] to do. [redacted] has the lead.	Consider having Integrys Engineering take a lead role in developing the SOV for each project phase independent of the contractors' bid to properly represent the Rider and Non-Rider charges associated with the AMRP construction activities.	3.3.1
282	[redacted]	Permit List Sign-Off & Sequencing	03/02/2012	04/02/2012	Closed	[redacted]	4/2/12: CLOSED. The contractor is contractually not responsible for permits. I addition, permits are generally requested prior to initial contractor street sequencing and schedule baselines. The critical interface is contractor agreement of the street sequencing proposed, which is already in play when contractor submits their baseline schedule for approval. For 2012, all required permits will be a scheduled activity in the logic based Integrated Project Plan. This will allow for tracking, reporting, and monitoring of the permits. PMO [redacted]) working with CPG and Engineering will be jointly developing this portion of the schedule. Project Execution Plan contains formal process documentation.	Prior to CPG requesting permits from CDOT, contractor should formally review and "sign off" on the list of permits that Engineering has identified for a project, and provide input on the sequencing of the permits consistent with agreed upon construction schedule.	3.3.2
283	[redacted]	Incremental Contractor Permit Requests	03/02/2012	04/02/2012	Closed	[redacted]	4/2/12: CLOSED. There is no value in this, contractors may request release of permits already in hand or in process but do not identify permits needed. If permits are not available it is generally because of delays due to approval of engineering by the OUC. For 2012, all required permits will be a scheduled activity in the logic based Integrated Project Plan. This will allow for tracking, reporting, and monitoring of the permits. PMO [redacted]) working with CPG and Engineering will be jointly developing this portion of the schedule. Project Execution Plan contains formal process documentation.	Consider formally documenting contractor permit requests that are incremental to the list of permits required per the final engineering design.	3.3.2
284	[redacted]	Permit Variance Reporting	03/02/2012	04/02/2012	Closed	[redacted]	4/2/12: CLOSED. The integrated plan monitors release of the engineering package for OUC approval and, based on average time cycles, forecasts release of the permit application by CPG, and actual receipt of same. Additional tracking serves no purpose. For 2012, all required permits will be a scheduled activity in the logic based Integrated Project Plan. This will allow for tracking, reporting, and monitoring of the permits. PMO [redacted]) working with CPG and Engineering will be jointly developing this portion of the schedule. Project Execution Plan contains formal process documentation.	Develop a metric that reports the variance between permits required per engineering design and actual permits requested by contractor and/or CPG.	3.3.2

Issue ID	Initiator	Title	Due Date	Completion Date	Status	Assigned To	Action Updates/Solutions	Description	PWC Recommendation Number
285	[redacted]	Contingency Metric	02/24/2012	03/28/2012	Closed	[redacted]	3/28/12: CLOSED. New contingency metric based on extra work amounts and work complete has been developed and included in recent monthly reports. Agree to develop additional contingency metric and report out within the Monthly Report [redacted] to develop.	Cost of changes as a proportion of cost of work performed is the metric that should be used to track, forecast and report change cost.	3.3.4
286	[redacted]	Integrated Project Plan	03/30/2012	03/28/2012	Closed	[redacted]	3/28/12: CLOSED. Integrated Plan is developed and used to manage construction. Agreed. A logic based Integrated Project Plan is currently in development for the 2012 Work. [redacted] has this action item.	Consider integrating all key AMRP scope components via a work break down structure to help avoid the coordination issues that have been experienced to date. Integration does not necessarily mean having all activities included within the master schedule but having all data coded in such a way that provides transparency into the dependencies between functional activities.	3.4.1
287	[redacted]	Define Asset Information Capture Process / QA Testing	03/30/2012	08/13/2013	Closed	[redacted]	3/13/13: CLOSED. Required information and documentation for a project has been defined, captured, documented, and most importantly, monitored and tracked before closeout and final payment. Random sampling is not considered sufficient at this time to provide adequate confidence that all records are complete and available as needed. Instead a detailed tracking process is established that includes, among other things, the asset records cited such as as-built drawings and pressure charts. 8/20/12: Same Status as 6/29. Change forecast date to 10/31/12. 6/29/12: The available procedures and process documents do not consistently define where asset related information capture is required. Project generated documentation is being further defined (as process deliverables) at CE events and as the BPM Teams analyze and redesign existing processes. 3/28/12: In progress. Agreed. We will follow established PGL requirements and will audit against it. PMO QA [redacted] or designee) to conduct audit.	Identify the steps in the processes for a project (from design through closeout) where critical asset related information is defined, captured, and documented. Implement formal PMO QA testing on a random sample basis for each step where permanent documentation is created, especially As-Built and pressure tests. Use data gathered to determine the accuracy of the documentation and consistency of the processes.	3.5.1
288	[redacted]	Inspector Manual Revisions to emphasize QA role	03/30/2012	03/13/2013	Closed	[redacted]	6/29/12: Ongoing changes to inspection requirements, documentation, and the transition of administrative responsibilities (tickets, charts, permits, RFI, etc.) have made this document substantially obsolete. Replacing this hard copy document in-kind is not consistent with good document control practice and the migration to SharePoint. This document should be re-created in SharePoint as a Library that contains hyperlinks to each associated procedure and work order. 3/28/12: In progress. Agreed [redacted] (PMO Quality) to review for enhanced language as deemed appropriate. Qualified Contractor data is available and used by the inspectors.	Consider updating the Inspector's Manual to emphasize the role of PMO QA in Field Inspectors' compliance responsibility. Strengthen the oversight of welder and joiner qualifications in the Quality Management Matrix. Inspectors on each project should be provided lists with qualified personnel acceptable to the PMO and PGL.	3.5.2
289	[redacted]	QA Testing	03/30/2012	08/20/2012	Closed	[redacted]	8/20/12: CLOSED. The draft procedure and reports will continue to be tweaked for some time as we gain experience. Future enhancements to this might include: a) Adopt a category or classification for quality issues that is consistent with the (CMG) Compliance Monitoring Group audit database for analysis of trends and sharing data. b) Include this with other procedures and forms in the on-line Inspection Guideline document. (see PAIL #288) However, I think this can be closed on the pail list since the basic process is essentially in place. 6/29/12 Surveillance Inspections are ongoing. A procedure for (QASR) Quality Assurance Surveillance Reports is drafted including a summary report. 6/6/12: Moved due date to 6/30/12. Surveillance Inspections are in process. 3/28/12: In progress Agreed. PMO Quality [redacted]) to review and establish QA Plan and audit of this recommendation.	Implement QA testing to periodically observe, test, and record the accuracy and consistency of inspector sign off activities based on defined guidelines, roles and responsibilities.	3.5.3
290	[redacted]	3rd Party Help with As-Builts	02/15/2012		Closed	[redacted]	This recommendation has been considered and the AMRP PMO has determined that it is more appropriate for Construction Contractors to keep this in their Scope of Work.	Consider independent 3rd party assistance to review, complete, and submit the As-Built drawings. If pursued, remove the price of this activity from contractor's bids.	3.5.4
291	[redacted]	Bottom-up Cost Estimates	05/31/2012	01/23/2013	Closed	[redacted]	1/23/13: CLOSED. Recommend closure of this item. During 2012, the AMRP team developed a bottom-up estimate for 2013 and 2014 using historical contractor bid information and associated actual PGL costs. The average bid price per quantity (main installation, main restoration, cost of removal, services installation, services restoration) was used to forecast contractor bid costs for preliminary planned installation quantities of 2013 & 2014. The associated PGL labor, invoices, material, and other costs were also forecasted based on historical ratios experienced on a selected of completed 2011 projects. Recent experience in Extra Work percentages was also included in the forecast of 2013 & 2014 program costs. This bottom-up work product was shared with Jacobs Consultancy and used as the basis for re-estimating the 20-yr total program costs. On-going commitment: During January 2013, the AMRP team is refreshing the bottom-up cost estimates based on total quantities and total costs for the first two years of the program. These results will be used to prepare a new update of the 20-yr program cost model. ORIGINAL AUDIT RESPONSE: Develop 2012 bottoms up budget- [redacted]	Implement bottom- up estimating and budgeting processes for 2012 scope using 2011 actual cost data. Establishing robust cost baselines will facilitate better cost performance assessment and reporting.	3.6.1

Issue ID	Initiator	Title	Due Date	Completion Date	Status	Assigned To	Action Updates/Solutions	Description	PWC Recommendation Number
292	[redacted]	Additional Cost Metrics	06/30/2012	01/18/2013	Closed	[redacted]	1/18/13: CLOSED. Since this recommendation, AMRP has developed and reported the annual cash flow metric showing green/yellow/red tolerances around our cash flow projections. This metric was one of three primary AMRP KPIs reported as part of the Corporate Performance Scorecard for system modernization in 2012. This KPI metric indicated during the Summer of 2012 that we were at risk of exceeding our budget target. Program Cost Performance is regularly discussed in prominent sections of the ARMP monthly report, including the Executive Summary, Overall Program Performance (KPIs), and Main Issues Being Addressed. The AMRP monthly report also includes the Cost Summary Table and a Change Order Summary Page, which provide additional cost performance information. Commitment for Additional Improvement: Starting in January 2013, AMRP will provide a short cost narrative paragraph in the Overall Program Performance section to provide an executive summary of cost performance issues and monthly updates to the Annual Capital Spending Projection (Budget Achievement Estimate at Completion). Original Response: Agreed. Additional metrics and narrative to be added to the Monthly Report. [redacted] and [redacted] to mutually develop.	Consider implementing additional cost status metrics to provide a clearer picture of cost performance and status across all cost components and include such metrics and cost narratives in the monthly report.	3.6.3
293	[redacted]	Improved Cost Reporting	06/30/2012	01/23/2013	Closed	[redacted]	1/23/13: CLOSED. Recommend closure of this item. Throughout 2012, the AMRP team established budget line items and reported spending against those lines (see attached Budget Cost Summary). On several occasions in 2012, these budget categories were used to update forecasts and gain a better understanding of the likely annual cost outcome. Examples include: July 2012: AMRP team completed a mid-year forecast of year-end spending using these budget and cost categories (see attached). Results indicated the program would spend approx. $250 MM given no capital constraints. AMRP team then worked with senior leaders to determine appetite for additional AMRP capital spending. Sep/Oct 2012: AMRP team used Budget categories and cost tracking to forecast spending and develop 2012 program curtailment plan (see attached). Budget lines were used to forecast end of year spending and determine available spending by AMRP contractors, PGL crews and Non-AMRP contractors. Last spending projection in October was very effective in predicting actual spending for the year. ORIGINAL AUDIT RESPONSE: Agreed. Existing PGL cost tracking systems will be a challenge to extract data for analysis. We will audit program costs and make recommendations to support this specific Recommendation. Project Controls Staff & [redacted] to take the lead on this	Improve reporting on all aspects of project cost performance at the detailed level and against budgets set, e.g., materials, PMO, union / Shop labor, PGL management team, and engineering. Use project metrics to update forecasts and gain a better understanding of the likely annual cost outcome	3.6.3
294	[redacted]	Contingency Estimating and Management	03/30/2012	06/12/2014	Closed	[redacted]	6/12/2014: Cost report is complete and ready for implemetation 3/25/14: PWC developed a new comphrensive cost report incorporating contingency. Contingency will be established in the 2015 budget using quantative analysis of program risks 3/13/13: [redacted] working toward new 5/30/13 deadline to demonstrate contingency management using new 2013 Cost Tracking Worksheet. 8/22/12: Based on current actual cost data, we need to develop contingency expectations for 2013 projects. Original Audit Response: Agree in part. We will develop overall contingency based upon the Risk Register, this year's 5% and 10% allocations. We will manage contingency on a line item basis for the allocated contingency and hold the un-allocated contingency for risk management. On a monthly basis, we will re-allocate contingency as the field work progresses and risks materialize. [redacted] has this action. [redacted] has beed assigned management of the AMRP Risk Plan. Training and revision to the plan will take place Mid - May with a targeted implemention date of June 1. Any new risks requiring contingency will be brought forward to the budget and contingency will be allocated accordingly. The monthly AMRP cost report will reflect this.	In industry, 5% to 20% contingency is generally applied where the level of project definition is high and a detailed unit cost estimate has been undertaken. The contingency applied is considered to be at the lower end of the scale. The Project Team (PT) should consider formalizing and documenting all aspects of the contingency management process including contingency basis calculation. Management of contingency funds to and from contingency line items should be formally administered and tracked. Consider analysis of contingency in line with the risk register during the contingency development process to determine adequacy, e.g., probabilistic risk analysis. Analysis will show whether reasonable and sufficient contingency is available to keep the Project within the approved budget. Such analysis should then be applied throughout the project lifecycle to provide an indication of sufficiency as projects progress.	3.6.4
295	[redacted]	Material Delivery Coordination	03/02/2012	05/03/2012	Closed	[redacted]	5/3/12: CLOSED. Delivery Coordination activities are included in both the master (P6 schedule) and the Integrated Plans. Agreed. Will be an activity in the logic based Integrated Project Plan for 2012 and beyond [redacted]	Coordinate closely with the contractor on the requirements for delivery of material that meets the contractors' schedule. This early coordination and an ongoing feedback loop could also help ensure the contractor's requested material and permitting changes are necessary and justifiable.	3.8.1

Issue ID	Initiator	Title	Due Date	Completion Date	Status	Assigned To	Action Updates/Solutions	Description	PWC Recommendation Number
296	[redacted]	Time & Cost Probability Metrics	03/30/2012	12/17/2012	Closed	[redacted]	12/17/12: CLOSED. In our initial response to the recommendation, we stated we will implement this recommendation at an appropriate level for Program and project risks. At this time we believe that a quantitative risk analysis will not provide additional value to the project. We will complete the risk register by estimating cost and time impacts for our major risks, and update the AMRP Risk Plan to remove the quantitative risk analysis section by March 31, 2013. 3/28/12: In progress. Agree. AMRP will look to implement to an appropriate level for both Program risks and for construction project risks. [redacted] to take this action. See PAIL #294. [redacted] has been tasked with administration of the AMRP RMP. Revision and training of the RMP is planned with a targeted implementation of mid-May. See PAIL item #294 for 6/29/12 update.	We are experiencing utility Regulators asking utilities to provide project time and cost probability metrics - which is not a request to start implementing Quantitative Risk Assessment (QRA) but an expectation that it is already happening as it's a leading practice for large scale capital programs and project management in the utility sector. It is recommended that risk management processes are implemented as prescribed in the Risk Management Procedure including the use of QRA.	3.9.1
298	[redacted]	As-Built Quality Testing	03/30/2012	01/30/2013	Closed	[redacted]	1/30/13: CLOSED. 100% of as-builts are quality checked for accuracy. 11/30/12: Will recommend closure to [redacted]. Have done sufficient testing to complete this item. /8/23/12: Need a QA check of the paper as-builts to the information in the PGL systems of record. [redacted] to look into this. NEED AN OWNER. Sample testing of on-going activity with review of project documentation and with the Project Closeout activities to be implemented.	Consider implementing sample testing of As-Built documentation for accuracy and completeness as part of project close out activities	2.5.3
299	[redacted]	FMDR - Additional Asset Info Tracking	03/02/2012	08/28/2012	Closed	[redacted]	8/27/12: CLOSED. We have considered this options but do not believe it to be required nor of any value to the program. Current regulations require such tracking for high-pressure components, but is not required for distribution work. Recommend to close. Agreed, if required by PGL or regulators. [redacted] will coordinate for AMRP.	FMDR system allows for the tracking of Lot Numbers for Pipe and Serial Numbers for Valves. Consider using FMDR to capture this information to provide a complete set of asset information	2.5.4
300	[redacted]	Material Reconciliation and Analysis	03/02/2012	08/25/2014	Closed	[redacted]	8/25/2014: Materials Reconciliation Manager on board to address. 2015 construction contract requires preliminary materials reconciliation by contractor. 3/13/13 : [redacted] is in the planning stages of an audit on this topic, our audit will validate whether an effective process is being executed. 1/30/13: Transferred to [redacted] . [redacted] will work with [redacted] to determine which reconciliations have already been completed. 12/18/12: Need to send process to [redacted] for review and closure. 11/30/12: Will recommend closure to [redacted]. 8/22/12: Have a plan for reconciliation for both 2011 and 2012 work. Nothing else is needed from this action item. Recommended closure to [redacted] . [redacted] to follow-up with [redacted] to confirm. Original Audit Response: Material reconciliation is a requirement of the Contract Closeout Procedure. Variance reports will be developed for those projects where there is a significant delta of material quantities	Perform reconciliation of material by project. Compare and note variance for design Bill of Material (BOM), As-Built BOM, and Warehouse record of material issued for project. Consider capturing detailed lot batch and serial # information where possible. Determine the reason for and amount of material change during each particular project	2.8
301	[redacted]	Contractor Materials Management Analysis	02/29/2012	02/29/2012	Closed	[redacted]	NEED AN OWNER. This issue was explored in-depth and it was ultimately decided to continue to have PGL supply materials.	Consider placing responsibility for materials management on construction contractors. Enable them to purchase through PGL's system, and manage the ordering and delivery of materials within the project's firm fixed price. If this option is pursued, ensure robust QA oversight of material installation activities	2.8
303	[redacted]	QA Gap Review of AMRP and PGL	06/29/2012	01/30/2013	Closed	[redacted]	1/30/13: CLOSED. We have reviewed the existing PGL QA and the AMRP QA for gaps and overlaps as indicated in Observation Report Reference 2.6, Recommendation #1. Some of the key Quality Activities for PGL include: Operator Qualifications & Training, Inspection of construction work (Construction Inspectors for AMRP, PGL Supervisors for PGL Crews), and Audits performed by Compliance Monitoring Group. Each of these activities is also in place for the AMRP. There are processes in both Quality and Project Controls within the AMRP that are currently being evaluated for implementation across all construction (AMRP & Non-AMRP). An effort is underway by the Shop Construction Managers and Change Management to define and document the roles and responsibilities for all construction work. As appropriate, procedures and processes in-place for AMRP work will be expanded into the shops over the next 10-12 months. 9/5/12: A Plan for a Quality Management System for AMRP, which will include a review of PGL's QA/QC activities and policies, will be presented by November 1, 2012. The work to develop, document and implement the QMS procedures will be over the following months. The document will be dynamic for some time as procedures are developed and process improvements identified and added. Please consider using 12/31 for the document to be available. 3/23/12: The PMO will have a review of the AMRP Quality Program performed to ensure that it aligns with existing PGL QA Policies. [redacted] to coordinate this review. Due date 6/29/2012.	Perform a review of AMRP QA and other existing PGL QA activities and policies to ensure there are no gaps or overlaps in the formally assigned responsibility, oversight, inspection, and documentation processes for PMO QA and existing PGL QA organizations.	2.7

Issue ID	Initiator	Title	Due Date	Completion Date	Status	Assigned To	Action Updates/Solutions	Description	PWC Recommendation Number
304	[redacted]	Metrics for 20-year program	06/30/2012		Closed	[redacted]	3/13/13: [redacted] to discuss status and ability to close this item with [redacted]. Many metrics are not able to be gathered based on current system limitations. 1/30/13: [redacted] met with [redacted] to obtain list of desired metrics. Some of these will need to be developed - they don't exist today. [redacted] and [redacted] working on the list of desired metrics. Change forecast to 2/28/13. 12/18/12: Meet ing with [redacted] and [redacted] to discuss current and future metrics. Then will hand off to [redacted] for development. Original PAIL Item was #221 for 20-year program schedule and metrics. [redacted] to consider whether any additional metrics are needed as recommended by PwC audit report. There are additional metrics that are being considered for inclusion for 'metrics for 20 year program. [redacted] will compose a memo of those metrics, how the data can obtained, and how the newer metrics can be included in the System Modernization scorecard (if applicable). Will implement upon approval from keystakeholders and [redacted]. 20 year plan currently being revised by [redacted]	The PMO should develop metrics for the entire 20 year program.	3.4.1.2

ICC Docket No. 14-0496
Joint Applicants' Response to
Staff Data Requests ENG 3.01-3.05
Dated: September 26, 2014

REQUEST NO. ENG 3.03:

Referring to the Joint Applicants' response to Staff data request ENG 1.05, please explain why the O&M amounts associated with the AMRP increased by approximately 100% between 2014 and 2015.

RESPONSE:

The forecasted increase in O&M amounts associated with AMRP between 2014 and 2015 is due to the following:

- an increase in forecasted resources for field safety, document control, quality management and community relations.
- a forecasted increase in consulting rates.
- additional personnel attending safety training classes - time spent attending these classes is charged to O&M.

ICC Docket No. 14-0496
Joint Applicants' Response to
City of Chicago's Data Requests 4.01-4.15
Dated: September 26, 2014

REQUEST NO. 4.05:

In the direct testimony Allen Leverett (JA Ex. 1.0 at 19:414) the Joint Applicants assert that "Wisconsin Energy is experienced with successfully implementing and managing large infrastructure improvement projects."

The Joint Applicants' Application (p 11) states:
Wisconsin Energy has successfully implemented and managed large infrastructure improvement projects in urban areas. Between 2003 and 2013, Wisconsin Energy invested $9.1 billion to keep its gas and electricity equipment and facilities updated and in compliance with regulatory standards. In 2012, Wisconsin Energy announced plans to invest up to an additional $3.5 billion in infrastructure upgrades and renewable energy projects, including the replacement of aging gas pipelines." (footnotes omitted)

What percentage (and amount) of the increases in costs claimed in PGL's latest rate proceeding (ICC Docket No. 14-0225) does PGL attribute to compliance with applicable City of Chicago Department of Transportation (CDOT) regulations on infrastructure work in public rights of way?

a. What percentage and amount does PGL attribute to compliance with the changes in CDOT regulations that took effect in January 2014?
b. Provide the analogous information, separately, for WE operations in Wisconsin and in Milwaukee for any costs that WE attributed to local public rights of way regulations in WE's latest rate proceeding.

RESPONSE:

a. Joint Applicants object to this data request on the grounds that the information sought is beyond the scope of and not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of relevant and admissible evidence. Without waiving this objection or the Joint Applicants' General Objections, the Joint Applicants state as follows: The 2015 Test Year in Docket Nos. 14-0224/14-0225 (cons.) does not consider the cost impact of the modifications to the CDOT regulations that took effect January 1, 2014, because the assumptions for that test year were completed before CDOT circulated or released the modifications for comment; therefore, Peoples Gas cannot identify an amount or percentage of cost increase in the 2015 Test Year related to the 2014 CDOT regulations.

b. There were no material increases in costs claimed in WEC's latest rates cases that were directly attributable to compliance with new regulations on infrastructure work in public rights of way. For the purpose of this response, the Joint Applicants are defining material increases in costs as cost increases over historical levels that are attributable to new regulations imposed by the Wisconsin DOT or the City of Milwaukee.

ICC Docket No. 14-0496
Joint Applicants' Response to
City of Chicago's Data Requests 4.01-4.15
Dated: September 26, 2014

REQUEST NO. 4.06:

In the direct testimony Allen Leverett (JA Ex. 1.0 at 19:414) the Joint Applicants assert that "Wisconsin Energy is experienced with successfully implementing and managing large infrastructure improvement projects."

The Joint Applicants' Application (p 11) states:
Wisconsin Energy has successfully implemented and managed large infrastructure improvement projects in urban areas. Between 2003 and 2013, Wisconsin Energy invested $9.1 billion to keep its gas and electricity equipment and facilities updated and in compliance with regulatory standards. In 2012, Wisconsin Energy announced plans to invest up to an additional $3.5 billion in infrastructure upgrades and renewable energy projects, including the replacement of aging gas pipelines." (footnotes omitted)

How much has PGL actually paid, detailed on a monthly basis, for each of the following costs or related items, during the period from 2011 to the present?

a. Degradation fees for excavations in moratorium streets
b. Expanded restoration requirements for street openings
c. Excavation perimeter joint sealant requirements
d. Fees for obstructed parking at metered locations
e. Backfill materials for parkway trenches
f. Filling abandoned pipes with flowable fill
g. Pavement marking

RESPONSE:

Joint Applicants object to this data request on the grounds that the information sought is beyond the scope of and not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of relevant and admissible evidence. Without waiving this objection or the Joint Applicants' General Objections, the Joint Applicants state as follows: Peoples Gas does not track costs at a level of detail that corresponds to the seven categories in this request. For example, while it may be able to identify its total restoration costs, it does not have the information to identify the costs attributable to expanded restoration requirements for street openings. To the extent contractors perform work, Peoples Gas does not require contractors to itemize invoices by the requested data.

ICC Docket No. 14-0496
Joint Applicants' Response to
City of Chicago's Data Requests 4.01-4.15
Dated: September 26, 2014

REQUEST NO. 4.07:

In the direct testimony Allen Leverett (JA Ex. 1.0 at 19:414) the Joint Applicants assert that "Wisconsin Energy is experienced with successfully implementing and managing large infrastructure improvement projects."

The Joint Applicants' Application (p 11) states:
Wisconsin Energy has successfully implemented and managed large infrastructure improvement projects in urban areas. Between 2003 and 2013, Wisconsin Energy invested $9.1 billion to keep its gas and electricity equipment and facilities updated and in compliance with regulatory standards. In 2012, Wisconsin Energy announced plans to invest up to an additional $3.5 billion in infrastructure upgrades and renewable energy projects, including the replacement of aging gas pipelines." (footnotes omitted)

How much did PGL budget, on a monthly basis, for the following items in its annual budgets from 2011 to present:

a. Degradation fees for excavations in moratorium streets
b. Expanded restoration requirements for street openings
c. Excavation perimeter joint sealant requirements
d. Fees for obstructed parking at metered locations
e. Backfill materials for parkway trenches
f. Filling abandoned pipes with flowable fill
g. Pavement marking

RESPONSE:

Joint Applicants object to this data request on the grounds that the information sought is beyond the scope of and not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of relevant and admissible evidence. Without waiving this objection or the Joint Applicants' General Objections, the Joint Applicants state as follows: Please see the response to City data request 4.06. Peoples Gas does not develop budgets at a level of detail that corresponds to the seven categories in this request.

ICC Docket No. 14-0496
Joint Applicants' Response to
City of Chicago's Data Request 3.01-3.08
Dated: September 18, 2014

REQUEST NO. 3.05:

Please provide an organizational chart displaying all the positions responsible for the Peoples Gas-City coordination activities described in the preceding Requests 1-4.

RESPONSE:

There are several areas within Peoples Gas (PGL) and Integrys Business Support (IBS) that are tasked with coordinating activities with City of Chicago's Department of Transportation (CDOT) and other third party utilities. Below is a listing of these areas and an explanation of information that is provided to CDOT and other third party utilities:

IBS Gas Engineering – Distribution Design:

- All capital design gas main projects are submitted to the Office of Underground Coordination (OUC) for review and approval prior to permitting as outlined in the CDOT Rules and Regulations for Construction in the Public Way, January 2014 under Section 3.3. The January 2014 Rules and Regulations can be found using the following link:
  - http://www.cityofchicago.org/content/dam/city/depts/cdot/Construction%20Guidelines/2014CDOTRulesRegs.pdf
- First Thursday of every month IBS Gas Distribution Design personnel attend the Department of Water Management (DWM) In-House/PC/TA Construction Utility Coordination Meeting. These meetings are used to identify where existing facility protection, relocation and/or replacement are required for the installation of City of Chicago Sewer and Water mains. Updated sewer schedules are usually received at this meeting.
- 30% Sewer design submittals (i.e., when sewer design is 30% complete) are emailed to the Engineering Supervisor to identify conflicts with existing gas main ahead of the Existing Facility Protection (EFP) OUC review as outlined in the memorandum from the Department of Water Management dated February 14, 2013.
- Provide 5 year Capital Improvement Projects (CIP) listing to the CDOT Project Coordination Office (PCO) as outlined in CDOT Rules and Regulations for Construction in the Public Way, January 2014 under Section 2.4
- Review third party OUC EFP submittals for conflicts with existing PGL capital projects.

PGL Construction Planning Group:

- Attend weekly Focus Group Meeting coordinated by CDOT's PCO as outlined in CDOT Rules and Regulations for Construction in the Public Way, January 2014 Chapter 2 Coordination of Work in the Public Way to discuss weekly conflicts listing provided by CDOT PCO.