

ICC Docket No. 14-0496
Joint Applicants' Response to
Illinois Attorney General's Data Requests AG 11.01
Dated: December 23, 2014

REQUEST NO. AG 11.01:

Please refer to the Direct Testimony of William Cheaks Jr. for the City of Chicago/CUB at 25:494-496 and at City-CUB Ex. 3.6. Please provide evidence that the \$12,615,425 in degradation fees paid to the City of Chicago since July 13, 2012 have been removed from rate increases requested in Docket No. 12-0512, Docket No. 14-0225, Rider QIP and Rider ICR. Also, please provide evidence that any degradation fees paid to the City of Chicago prior to July 13, 2012 were not recovered through base rates, Rider ICR, or any other rate recovery mechanism.

RESPONSE:

The degradation fees to which Mr. William Cheaks Jr. is referring pertain to the July 2012 revisions to Chicago Department of Transportation's (CDOT) Regulations that created a degradation fee for openings within a Moratorium Street. These are not fines and penalties and are not excluded from rate recovery.

Peoples Gas did not exclude degradation fees from (a) its revenue requirements in rate case proceedings, Docket Nos. 12-0511/12-0512 (cons.) and Docket Nos. 14-0224/14-0225 (cons.) and (b) Rider QIP. No other recovery mechanism exists for such fees.

Any degradation fees prior to the July 2012 CDOT regulation revisions were not excluded from Peoples Gas' revenue requirements in rate case proceedings filed prior to Docket No. 12-0511/12-0512 (cons.) and Rider ICR. No other recovery mechanism exists for such fees.