

ICC Docket No. 14-0496
City/CUB Response
to JA's Second Set of Data Requests

December 15, 2014

JA CC 2.54 Referring to lines 494-502 of Mr. Cheaks' Direct testimony, City/CUB Ex. No. 3.0, does Mr. Cheaks claim that Peoples Gas can avoid degradation fees completely for AMRP work? If so, what is the basis for this claim? Please be specific and provide all supporting documentation, work papers or analysis that support Mr. Cheaks' position.

RESPONSE: No, that is not Mr. Cheaks' claim. Mr. Cheaks' position is that Peoples Gas could minimize degradation fees with better planning and scheduling decisions.

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JA CC 2.55 Referring to lines 494-502 of Mr. Cheaks' Direct testimony, City/CUB Ex. No. 3.0, is it Mr. Cheaks' position that Peoples Gas can avoid degradation fees completely for O&M work? If so, why? Please be specific and provide all supporting documentation, work papers or analysis that support Mr. Cheaks' position.

RESPONSE: No, that is not Mr. Cheaks' position.