

**ICC Docket No. 14-0496**  
**Joint Applicants' Response to**  
**Illinois Attorney General's Data Requests AG 10.01-10.20**  
**Dated: December 23, 2014**

**REQUEST NO. AG 10.15:**

Refer to Mr. Giesler rebuttal testimony, JA Ex. 10.0, at 5:96-110. Please:

- a. Provide a list of segments with a UMRI of 5 and greater that have been replaced since 2011 and indicate what year they were replaced.
- b. Provide also the related cost and neighborhood priority ranking or UMRI ranking to each of the projects.
- c. Explain the contradiction of Mr. Giesler's testimony on the MRI and UMRI in his rebuttal testimony and the JA response to data request AG 6.12 d, which states that the Neighborhood Ranking Methodology does not use UMRI as an attribute

**Response:**

Joint Applicants object to this data request, to the extent it requests information about prior rate cases, 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:

- a. Peoples Gas does not maintain gas main segment data in a manner that could be used to provide a list of historical main rank index (MRI) values. Once data for a particular segment is changed or the segment is retired, there is no way to go back and provide a UMRI (uniform main rank index) from a past date. Therefore, the data shown in the attachment, JA AG 10.15 Attach 01 CONFIDENTIAL, represents all gas main segments replaced from 2011 through December 26, 2014 regardless of whether the UMRI ranking was 5 or greater for that particular main segment.
- b. Peoples Gas does not track the cost of main replacement by segment. For UMRI ranking, please refer to the response to subpart (a).
- c. There is no contradiction in Mr. Giesler's rebuttal testimony. As was stated, main segments with a UMRI value greater than 3.0 are taken into account and considered for replacement when adjacent Public and System Improvement projects are being designed. The Neighborhood Ranking Methodology does not use UMRI as an attribute as is stated in JA AG 6.13 Attach 01 CONFIDENTIAL, Page 12 of 58, Figure 9 – Attribute weighting. However, the scope of an AMRP project has the potential to be altered based on the Public and System Improvement project designs that fall within the AMRP project boundaries. Therefore Public and System Improvement Projects can impact planning of AMRP projects.