

Response to Attorney General's  
Third Set of Data Requests to Staff  
Docket No. 14-0496  
Response of Staff Witness Stoller

ICC Person Responsible: Harold Stoller  
Title: Director, Safety & Reliability Division  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701

**AG-Staff 3.01**

Ref: ICC Staff Ex. 15.0, 2:26-40. At the referenced lines, Mr. Stoller quotes Section 1.2 from the RFP for Liberty Consulting Group's audit, providing that Phase I of the audit will "help ensure that Peoples completes its AMRP in the shortest reasonable time and at the lowest reasonable cost."

- (a) As part of its contracted task of ensuring that Peoples Gas completes the AMRP in the "shortest reasonable time", was Liberty Consulting Group asked to consider the constraint that the "shortest reasonable time" cannot end after 2030? If the answer is "yes," please provide all documents in which that constraint is discussed. If the constraint was not communicated in a document, please state who communicated to Liberty that the "shortest reasonable time" cannot end after 2030.
- (b) Does Mr. Stoller contend that it is impossible that Liberty Consulting Group could determine that the "shortest reasonable time" for completion of the AMRP is a time frame ending after 2030? If the answer is yes, please provide all analyses, documents, or citations that Mr. Stoller relies on for this contention.

**Response**

AG-Staff 3.01(a) Mr. Stoller has found no place in the RFP for Liberty consulting Group where Liberty Consulting was asked "to consider the constraint that the 'shortest reasonable time' cannot end after 2030."

AG-Staff 3.01(b) Mr. Stoller does not contend that it is impossible that Liberty Consulting Group could determine that the 'shortest "reasonable time" for completion of the AMRP is a time frame ending after 2030.

**OFFICIAL FILE**I.C.C. DOCKET NO. 14-0496AG Cross Exhibit No. 12Witness StollerDate 2/19/15 Reporter TO

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**AG-Staff 3.02**

Ref: Staff Ex. 15.0, 2:26-40.

- (a) Does Mr. Stoller agree that a directive for Peoples Gas to complete the AMRP "in the shortest reasonable time" does not appear in the Commission's Docket Nos. 09-0166/0167 (cons.) rate case order?
- (b) Does Mr. Stoller agree that the rebuttal testimony of Staff witness Buxton in Docket Nos. 12-0511/0512 (cons.), ICC Staff Ex. 20.0 in that case, states that one reason for his recommended investigation of the AMRP is to assure the Commission that PGL will complete its AMRP at a reasonable cost and within a reasonable time?

**Response**

AG-Staff 3.02(a) Mr. Stoller has not found "a directive for Peoples Gas to complete the AMRP 'in the shortest reasonable time' [ ] in the Commission's Docket Nos. 09-0166.0167 (cons.) rate case order."

AG-Staff 3.02(b) Mr. Stoller agrees "that the rebuttal testimony of Staff witness Buxton in Docket Nos. 12-0511/0512 (cons.) ICC Staff Ex. 20.0 in that case, states that one reasons for his recommended investigation of the AMRP is to assure the Commission that PGL will complete its AMRP at a reasonable cost and within a reasonable time."

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**AG-Staff 3.03**

Ref: ICC Staff Ex. 15.0, 3:60-64. At the referenced lines, Mr. Stoller states that "Liberty's task is . . . to make recommendations regarding how [Peoples Gas] can get back on schedule to complete AMRP by 2030." Other than the provision in Section 1.2.11.3 of the RFP asking Liberty to calculate the pipe replacement pace for a 20-year program length, is there any other reference in the RFP to (i) a 2030 completion date, (ii) a 20-year program length, or (iii) the pipe replacement pace calculation contemplated in Section 1.2.11.3? If the answer is "yes," please identify each such reference.

**Response**

AG-Staff 3.03 Mr. Stoller is aware of no "reference in the RFP to (i) a 2030 completion date, (ii) a 20-year program length, or (iii) the pipe replacement pace calculation contemplated in Section 1.211.3."

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**AG-Staff 3.04**

Ref: State of Illinois Request for Proposal ("RFP"), Illinois Commerce Commission, Peoples Gas Light and Coke Company, IPB Ref # 39 22032146, provided as workpaper to ICC Staff Ex. 15.0. The third paragraph of Section 1.1 on page 18 of the RFP states:

The goal of the Phase 1 investigation is to examine Peoples' AMRP, determine the AMRP's likely cost through completion, determine the AMRP's likely completion date, find answers to many other issues listed in this RFP under Paragraph 1.3.12, make appropriate recommendations, report Vendor's findings, conclusions, and recommendations to Agency in a Phase 1 investigation report, and provide sworn written testimony supporting the Phase 1 investigation report in a future Peoples docketed general rate increase case or other proceeding as directed by the Commission.

Under this language from the RFP, was Liberty Consulting Group's goal of determining the AMRP's likely completion date constrained by a condition that the "likely completion date" could not be determined to be after 2030? If the answer is "yes," please state whether that constraint is included in the RFP; if the constraint is not included in the RFP, please state the source of the constraint.

**Response**

AG-Staff 3.04 Mr. Stoller is aware of no information to indicate that "Liberty Consulting Group's goal of determining the AMRP's likely completion date [was] constrained by a condition that the 'likely completion date' could not be determined to be after 2030."