

Exhibit B

Illinois Commerce Commission
Docket No. 02-0155

First Data Response to Consumers Illinois Water Company's Data Request Directed to William R. Johnson

Data Request No. 13:

Assuming that CIWC prudently incurs Enforcement Costs in collecting unpaid charges for water and sewer service, state whether Mr. Johnson agrees that prudent costs should be recoverable in rates. If Mr. Johnson disagrees, explain why and provide all Documents, including but not limited to, studies and analyses, which Mr. Johnson relies upon to support his position.

Data Response No. 13:

If the Commission determines that enforcement costs are prudently incurred then Mr. Johnson agrees that those costs should be recovered in rates.

Exhibit C

**Illinois Commerce Commission
Docket Number 02-0155**

Response of the Citizens Utility Board
to Consumers Illinois Water Company's Data Request No. 4

Responding witness: Roger D. Colton

4. Discuss in detail Mr. Colton's understanding of the working capital allowances presently reflected in rates for the Woodhaven and Candlewick Divisions. Provide all supporting Documents, including but not limited to, all Documents from the prior rate proceeding for each Division that Mr. Colton reviewed.

RESPONSE:

Mr. Colton has not reviewed documents from the Company's prior rate proceeding.

Exhibit D

Illinois Commerce Commission
Docket No. 02-0155

First Data Response to Consumers Illinois Water Company's
Data Request Directed to William R. Johnson

Data Request No. 7:

With reference to Mr. Johnson's testimony at page 8, lines 163-165, state whether Mr. Johnson believes that the Company should pursue foreclosure actions even if the cost of doing so is unjustified by the amount that could be recovered. If this is Mr. Johnson's position, explain why and provide all Documents, including but not limited to, workpapers, studies and analyses, which Mr. Johnson relies upon to support his position.

Data Response No. 7:

Mr. Johnson does believe that pursuing foreclosure actions even if the cost of doing so is greater than the amount that can be recovered. However, Mr. Johnson does not consider it unjustified. As Mr. Johnson states in his testimony, page 8 lines 165-167, the pursuit of even a small number of foreclosure actions may have a broad effect in encouraging other delinquent customers to come forward and pay.

Exhibit E

**Illinois Commerce Commission
Docket Number 02-0155**

Response of the Citizens Utility Board
to Consumers Illinois Water Company's Data Request No. 3

Responding witness: Roger D. Colton

3. At page 3, lines 10 through 16, Mr. Colton states, "in addition to causing the Company to incur the costs of the enforcement actions, the collection mechanism will generate offsetting expense savings to the Company as well. One of the most significant aspects of those cost savings will be the reduction in working capital associated with the arrears that are recovered through the lien enforcement activities. The working capital savings are significant because these savings arise by definition." State the basis for each of these assumptions and provide all supporting Documents, including but not limited to workpapers showing the reduction in working capital that Mr. Colton believes would occur. In addition, provide an explanation for the statement that these savings "arise by definition."

RESPONSE:

No specific documents were relied upon in making the cited statement. No quantification has been prepared of the extent of working capital savings. Mr. Colton's explanation of *why* working capital savings arise by definition is presented in his Direct Testimony, page 3, lines 17 through 23.

Exhibit F

**Illinois Commerce Commission
Docket Number 02-0155**

Response of the Citizens Utility Board
to Consumers Illinois Water Company's Data Request No. 16

Responding witness: Roger D. Colton

16. At page 8, beginning at line 21, Mr. Colton asserts that “only in the most unusual of situations would the value of the foreclosed property be less than the amount of the unpaid bill plus the proposed recovery limit of \$1,200 in enforcement costs. The average value of undeveloped lots in question is tens of thousands of dollars.” Provide the basis for these statements and all Documents, including but not limited to property value assessments for the Woodhaven and Candlewick areas, which Mr. Colton relies upon to support the statements.

RESPONSE:

Mr. Colton based this statement upon counsel's conversation with a representative of the Candlewick Association.