EXHIBIT A

ILLINOIS
COMMERCE COMMISSION

JUL 3 1 22 PM '02

CHIEF CLERK'S OFFICE

For Commission Use Only:
Case: 02-1452

# FORMAL COMPLAINT

Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, Illinois 62701

Regarding a complaint by (Person making the complaint BETTY JOHNSON

Against (Utility name): PEOPLES GAS

As to (Reason for complaint) OVERCHARGING & ESTIMATED BILL

HICAGO Illinois.

TO THE ILLINOIS COMMERCE COMMISSION, SPRINGFIELD, ILLINOIS:

My mailing address is ~~3301~~ 3947 W. POLK ST. CHICAGO IL 60624

The service address that I am complaining about is SAME AS ABOVE

My home telephone is (773) 826-3842

Between 8:30 A.M. and 5:00 P.M. weekdays, I can be reached at (773) 826-3842

(Full name of utility company) PEOPLES GAS (respondent) is a public utility and is subject to the provisions of the Illinois Public Utilities Act.

In the space below, list the specific section of the law, Commission rule(s), or utility tariffs that you think is involved with your complaint.

IL 83 - 200.150 & 200.170

Have you contacted the Consumer Services Division of the Illinois Commerce Commission about your complaint? ☑ Yes ☐ No

Has your complaint filed with that office been closed? ☐ Yes ☑ No

Please state your complaint briefly. Number each of the paragraphs. Please include time period and dollar amounts involved with your complaint. Use an extra sheet of paper if needed.

1. In January, 2002 I received an estimated bill for over $1600.00
I called People Gas and was told this $1600.00 bill was based on gas bills from 1998 & 1999.

2. I've made many phone calls to People Gas since then, but they keep saying the same thing, that this bill is based on bills from 1998 and 1999.

3. I have never, ever received a $1600 gas bill for one month service prior to this.

Please clearly state what you want the Commission to do in this case:

1. Insure that PG stop sending estimated bills.
2. Void current inaccurate bill
3. Have PG refund $2500. I have overpaid over the years based on their inaccurate estimated bills.

Date: _____ (Month, day, year)

Complainant's Signature Betty Johnson

If an attorney will represent you, please give the attorney's name, address, and telephone number.

You need to file the original with the Commission. Also, provide one copy for each utility complained about (referred to as respondents).

**VERIFICATION**

A notary public must witness the completion of this part of the form.

I, Betty Johnson, first being duly sworn, say that I have read the above petition and know what it says. The contents of this petition are true to the best of my knowledge.

(Signature) Betty Johnson

OFFICIAL SEAL
ROSIE MAE FORD
NOTARY PUBLIC STATE OF ILLINOIS
MY COMMISSION EXP. SEPT. 1,2003

Subscribed and sworn/affirmed to before me on (month, day, year) JUL - 1 2002

Rosie Mae Ford
Notary Public, Illinois

**NOTE:** Failure to answer all of the questions on this form may result in this form being returned without processing. If you have questions, please call the counselor in the Consumer Services Division that handled your informal complaint.

EXHIBIT B

PEOPLES ENERGY
Peoples Gas
North Shore Gas

October 11, 2002

Ms. Betty Johnson
3947 West Polk Street
Chicago, Illinois 60624

Dear Ms. Johnson:

Please find enclosed Respondent's First Set of Data Requests to Complainant with respect to Betty Johnson vs. The Peoples Gas Light and Coke Company, Illinois Commerce Commission Docket No. 02-0452. Please call with any questions.

Sincerely,

Peter Brigida
Counsel

Writer's Direct Dial:
(312) 240-4461

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Betty Johnson,

Complainant,

vs. Ill.C.C. Docket No. 02-0452

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THE PEOPLES GAS LIGHT AND COKE COMPANY,

Respondent.

RESPONDENT'S FIRST SET OF DATA REQUESTS TO COMPLAINANT

The following is The Peoples Gas Light and Coke Company's First Set of Data Requests to Complainant.

DEFINITIONS AND GUIDELINES

The following definitions and guidelines apply in full to all of the documents, data, materials and answers sought herein:

A) In answering these data requests, furnish all information that is available to Complainant including information in the possession, custody or control of Complainant's agents, and representatives, all others from whom Complainant may freely obtain it, and Complainant's attorneys and investigators.

B) Each data request should be answered based upon Complainant's knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.

C) If Complainant or Complainant's attorney has possession, custody, or control of the originals of the documents requested, please produce the originals or a complete copy of the originals.

D) If Complainant or Complainant's attorneys do not have possession, custody, or control of the originals of the documents requested, please produce copies that are in the possession, custody, or control, however made, of Complainant or any of Complainant's attorneys. If any document requested is not in Complainant's possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.

E) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

F) In providing Complainant's responses, please start each response on a separate page and set forth in full, at the top of the page, the request that is being answered.

G) Please number all documents and work papers that are provided in response to this data request.

H) For each numbered item of this data request, please identify any witness, other than Complainant, that may be responsible for answering cross-examination requests regarding the numbered item.

I) Each data request remains active throughout this proceeding. If a document comes into existence, or if Complainant obtains any further information, subsequent to the service of Complainant's response to these data requests, please provide such document or information as part of a supplemental response hereto.

J) Please respond to all data requested by November 8, 2002

K) As used in the data requests, the term "document" includes all materials subject to discovery pursuant to Ill.S.Ct.Rul. 214 (adopted by the Commission at 83

Ill.Adm.Code §200.360(c), including the original and non-identical copies and drafts e.g., copies with notes, editing marks, modifications, additions, or deletions) of all recorded or graphic matter, whatsoever, whether in written or electronic form.

L) For all other terms in this data request, please use the definitions contained in the Public Utilities Act (the "Act"), or if not defined therein please use the plain and ordinary meaning of the term.

DATA REQUESTS

1 Please describe with particularity the type of appliance or appliances that supplied heat to 3947 West Polk Street and its individual apartments and other units at any and all times from January 1995 through and including the present. With respect to each appliance please specify the location of such appliance, the portion(s) of 3947 West Polk Street and its individual apartments and other units to which the appliance supplied heat, and the time period(s) that such appliance supplied heat to such portion(s) of 3947 West Polk Street and its individual apartments and other units.

2 Please describe with particularity the type of appliance or appliances that supplied hot water to 3947 West Polk Street and its individual apartments and other units at any and all times from January 1995 through and including the present. With respect to each appliance please specify the location of such appliance, the portion(s) of 3947 West Polk Street and its individual apartments and other units to which the appliance supplied hot water, and the time period(s) that such appliance supplied hot water to such portion(s) of 3947 West Polk Street and its individual apartments and other units.

3. Did 3947 West Polk Street and its individual apartments and other units use natural gas to fuel all appliances that supplied heat or hot water (the "Building Appliances") at all times from January 1995 through and including the present? If the answer is other than yes, please provide: the specific Building Appliance(s) that did not use natural gas, the location of such Building Appliance(s), the portion(s) of 3947 West Polk Street and its individual apartments and other units to which such Building Appliance(s) supplied heat or hot water, the time period(s) that such Building Appliance(s) supplied heat or hot water to such portions of 3947 West Polk Street and its individual apartments and other units, the period(s) energy other than natural gas fueled any such Building Appliance(s), and the periods, if any, such Building Appliance(s) were not operating.

4. If the answer to Questions 3 is other than yes, please provide the make, model, Btu rating and energy source for each of the Building Appliance(s) currently installed or installed at any time during the period of the type of Building Appliance(s) that Complainant states in Question 3 were fueled by an energy source other than natural gas. In answering this question, include information and documentation regarding any Building Appliance(s) that was retrofitted during the period to switch from one form of energy to another.

5. If the answer to Questions 3 is other than yes, please provide dates, bills and the names of contractors that supplied, installed or retrofitted any and all Building Appliances detailed in response to Question 4. Include in response to this answer any and all records, e.g., invoices, canceled checks and contracts, memorializing the transactions.

6. If the answer to Questions 3 is other than yes, please detail the type of energy that fueled any Building Appliance(s) at any time during the period of January 1995 through and including the present.

   If the answer to Questions 3 is other than yes, please provide dates, bills and the names of vendors that supplied energy other than natural gas to fuel the Building Appliances detailed in response to Question 6. Include in the response to this answer any and all records, e.g., invoices, canceled checks and contracts, memorializing the transactions.

8. Please provide the name of all persons who lived at 3947 West Polk Street including its individual apartments and other units at any time from January 1995 through the present.

9. For each person named in response to Question 8, please provide the individual apartment or other unit at which the person lived, the time period that the person lived at such apartment or unit, a copy of any lease or rental document for such person, and the person's current address and telephone number.

10. Please describe with particularity the type of appliance or appliances that were used for cooking purposes at 3947 West Polk Street including its individual apartments and other units at any and all times from January 1995 through and including the present. For each such cooking appliance listed, please list the specific location of each such cooking appliance and the make, model and energy source for each such cooking appliance.

11. Please describe with particularity any and all installation, removal, repair, reconfiguration or other work (collectively "Work") on the natural gas piping or Building Appliances at 3947 West Polk Street including its individual apartments and other units at any and all times from January 1995 through and including the present. Please include the date(s) of such Work, the reason for such Work, the name of any and all persons or entities who performed the Work, and all bills, invoices, receipts, contracts, canceled checks and other records regarding the Work.

12. Please provide copies of all bills for all natural gas service accounts for 3947 West Polk Street and/or its individual apartments and other units since January 1995.

13. Please list all payments made on each natural gas service account for 3947 West Polk Street and/or its individual apartments and other units since January 1995, including, but not limited to, all payments made on account number 3500013475152 since February, 2000.

14. For each payment listed in response to Request #13, please provide the date of the payment, the amount of the payment, and the method of payment (e.g. by personal check, cash, money order, cashier's check, credit card, etc,), the account number for which the payment was being made, and copies of all documents evidencing any payments.

15. Since January 1995, did Complainant receive any calls, make any calls, have any conversations, receive any correspondence, send any correspondence, or have any other communication with Respondent or any other person regarding the status of any account(s), or transferring or establishing, or reestablishing any account(s), or concerning whether the Complainant owed an outstanding balance to Respondent for any natural gas service account at 3947 West Polk Street and/or its individual apartments and other units

16. If the answer to Request #15 is in the affirmative, please describe in detail the date of each such contact, the name of person(s) who participated or responded, and the substance of the conversation or communication.

17. If the answer to Request #15 is in the affirmative, please provide a copy of any and all written or tape recorded records, reports or documents relating to such conversation or communication, including, but not limited to, any and all written or tape recorded records, reports or documents made describing the nature of the contact(s) and any action taken in response to Complainant's contact(s).

18. Please list the specific section of any statute, Administrative Code, Illinois Commerce Commission rule or order, and utility tariff that Complainant claims Respondent has violated.

19. For each section of any statute, Administrative Code, Illinois Commerce Commission rule or order, and utility tariff that Complainant claims Respondent has violated, please fully and completely describe those actions of Respondent that constitute a violation.

20. For each section of any statute, Administrative Code, Illinois Commerce Commission rule or order, and utility tariff that Complainant claims Respondent has violated, please provide all documents that evidence such a violation by Respondent.

21. For each section of any statute, Administrative Code, Illinois Commerce Commission rule or order, and utility tariff that Complainant claims Respondent has violated, please list the name, address, telephone number, name and address of employer, and occupation of each person who has knowledge regarding those actions of Respondent that constitute a violation. For each such person, please list how long Complainant has known such person and the type of relationship, personal or otherwise, Complainant has or had to such person?

Respectfully submitted

Peter Brigida
An Attorney for
The Peoples Gas Light and Coke Company

James Hinchliff
Matthew A. Greene
Peter Brigida
Attorneys for
The Peoples Gas Light and Coke Company
130 E. Randolph
23rd Floor
Chicago, Illinois 60601
(312) 240-4461

Dated this 11th day of
October, 2002, at Chicago, Illinois

EXHIBIT C

Betty Johnson
3947 w. Polk st
Chicago Ill- 60624
773 826-3842

Mr Peter Brigida

D hotwater tank an Furnace-
Basement,

3) yes

13) (1998) 1-02. $358-53 2-22-26 22.
3-21 $221.31 5-8 $78.13,
6-2 $84.39 8-24 $55.60

(1999) 1-14 $200.00 2-1 $393.69
3-1 $221.75 4-2 $217.93
6-8 $250.00 7-13 $34.00
8-5 $24.66 10-1 $24.00
11-4 $108.53

(2000) 1-5 $449.06 2-10 $281.17
4-5 $413.09 5-1 $113.86
7-7 $72.69 9-6 29.21 10-9- $36 51
11-13 39.14 12-6 $72.91

Betty J hnso
3949 w Polk st
Chcag Ill 0624

Mr B g da

5) (2000 Mr Kankol 9 7
Ms Pears 10 9

(2001) Ms Jhso 2 2 2
Ms Robesn 1

(2002) Ms. Staley 2-4 2 5
Ms. Johnson 2-27 — 3-8
Ms. Roman 10-24 Ms. Leah
Mr. Contreras 10-25
Ms. Woodley 10-25

Betty Johnson