

Provided Pursuant to Sections 4-404 and 5-108 of the Public Utilities Act

September 30, 2014

Via Email and U.S. Mail

Mr. Darin Burk
Manager – Pipeline Safety
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701

Re: Revised Corrective Action
NOPV #2014-V001-00010
Inspection #2014-P-00040

Reference: 1. Letter from DR Burk (ICC) to WS Evans (NSG) dated February 27, 2014
2. Letter from TJ Webb (NSG) to DR Burk (ICC) dated March 31, 2014
3. Letter from TJ Webb (NSG) to DR Burk (ICC) dated June 30, 2014

Dear Mr. Burk:

In Reference 1, the Illinois Commerce Commission (ICC) issued a Notice of Probable Violation (NOPV) to North Shore Gas Company (NSG) relating to CFR §192.459 - External corrosion control: Examination of buried pipelines when exposed.

In Reference 2, NSG responded to this violation by committing to perform an extent of condition review to determine if there were other occasions during 2013 when NSG or contract personnel failed to document the condition of a line and to submit the results of the review to the ICC.

In Reference 3, NSG notified the ICC that the extent of condition review found 22 services and 12 mains in which the condition of the pipe was not documented on the work ticket.

Reference 3 further states:

To assure that the condition of pipe is documented on the work ticket NSG has implemented the following actions:

1. Discussions were held with all personnel responsible for documenting the condition of mains and services and reviewing work orders. These discussions emphasized the need to document the condition of exposed pipe.

2. Tailgates were held with all personnel responsible for documenting the condition of an exposed pipe or that review completed works orders on the procedural requirements to document the condition of the main.
3. Additional management personnel have been assigned to review all work tickets prior to as-builting.

In addition to the corrective actions detailed in Reference 3, NSG has performed pipe to soil reads for:

1. All steel pipe that were exposed but did not have the condition of pipe recorded or
2. Steel pipe that were not exposed but would be beneficial for NSG to obtain pipe to soil read.

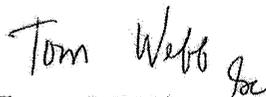
Corrosion readings were taken around the excavation areas as close as possible to confirm the condition of the pipe. As of the date of this letter, all of the corrosion readings on the steel pipes that were identified during the extent of condition review have been completed

	No documentation on work ticket (as previously reported)	On Plastic pipe (pipe to soil not performed)	Others (pipe to soil not performed)	Soil to Reading performed
Service	22	16	1 – b-box maint (pipe not exposed) 1- Main and service replaced due to system improvement	4
Main	12	5	0	7

Only one of the pipes was found to have a down reading. The down read was on a steel main that was not exposed, but NSG still obtain a reading. The work ticket indicates a partial service renewal of a plastic service, so only the service was exposed. In addition, a review of past records of the readings for this facility showed a continuous decrease in the reads which is indicative of a depleting anode. A new anode will be installed on the main.

Please contact me at your convenience if you have any questions regarding this matter.

Sincerely,



Thomas J. Webb
 Compliance Manager
 312-240-4650
 The Peoples Gas Light and Coke Company
 North Shore Gas Company