

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

October 22, 2014

Via U.S. Mail and Email

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

Re: Response to NOPV # 2014-V001-00056 through 2014-V004-00056
Inspection # 2014-P-00382

Reference: Letter from DR Burk (ICC) to JD Kleczynski (PGL) dated September 22, 2014

Dear Mr. Burk:

In the Reference, the Illinois Commerce Commission (ICC) issued a Notice of Probable Violation (NOPV) to The Peoples Gas Light and Coke Company (PGL). The Reference states:

A Notice of Probable Violation (“NOPV”) has been issued for the section of the Code of Federal Regulations (“CFR”) cited:

CFR §192.59 titled: “Plastic Pipe” states in paragraph (a)(1), "New plastic pipe is qualified for use under this part if: (1) It is manufactured in accordance with a listed specification

With reference to the requirements included in CFR §192.7 titled: “What documents are incorporated by reference partly or wholly in this part?” states in paragraph (c)(2), "The full titles of documents incorporated by reference, in whole or in part, are provided herein. The numbers in parentheses indicate applicable editions. For each incorporated document, citations of all affected sections are provided. Earlier editions of currently listed documents or editions of documents listed in previous editions of 49 CFR Part 192 may be used for materials and components designed, manufactured, or installed in accordance with these earlier documents at the time they were listed. The user must refer to the appropriate previous edition of 49 CFR Part 192 for a listing of the earlier listed editions or documents. (2) Documents incorporated by reference (12) ASTM 02513-99 “Standard Specification for Thermoplastic Gas Pressure Pipe, Tubing, and Fittings.” A 1.5.7 Outdoor Storage Stability- PE pipe stored outdoors and unprotected for at last two years from date of manufacture shall meet all of the requirements of this specification. PE pipe stored outdoors for over two years from date of manufacture is suitable for use if

it meet the requirements of this specification.

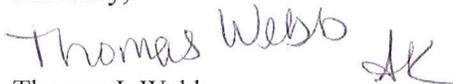
The Reference listed four (4) instances detailing the failure to meet the requirements as stipulated under 192.7(c)(2).

To address this issue, the following actions have or will be taken.

- (1) An extent of condition analysis was performed to identify any additional instances of PE pipe with a date of manufacture over two years at the time of installation. These conditions are listed in Attachment 1. The four services highlighted in red were listed in the NOPV and have been replaced with newer pipe. The fifteen services highlighted in green were identified in the field and replaced with newer pipe within a few days. The three mains and twelve services highlighted in yellow will require further investigation.
- (2) An update will be provided to the ICC on January 9, 2015 to report any additional documentation or evidence to support the age of the pipe at the time of installation for the facilities in question. If further evidence is not found, these facilities will be replaced no later than August 31, 2015. This timeframe is given to avoid service interruptions during the colder months.
- (3) Internal processes are being analyzed and will be modified as needed to monitor and avoid reoccurrence.
- (4) A tailgate will be issued to educate employees and remind them of the importance of checking the date of manufacturer prior to installation and throughout the as-building process.

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

Sincerely,

Handwritten signature of Thomas J. Webb in cursive, with the initials 'JK' written to the right.

Thomas J. Webb

Compliance Manager

312-240-4650

The Peoples Gas Light and Coke Company

North Shore Gas Company