

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

September 18, 2015

Via Email

Matthew T. Smith
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 1: Letter from DR Burk (ICC) to JD Klcczynski (PGL) dated September 22, 2014
- Reference 2: Letter from TJ Webb (PGL) to DR Burk (ICC) dated October 22, 2014
- Reference 3: Letter from TJ Webb (PGL) to DR Burk (ICC) dated January 9, 2015
- Reference 4: Letter from TJ Webb (PGL) to DR Burk (ICC) dated June 26, 2015
- Reference 5: Exit Meeting Documentation form dated July 16, 2015.

Dear Mr. Smith:

In Reference 5, The Peoples Gas Light and Coke Company (PGL) was informed by the Illinois Commerce Commission (ICC) that PGL's response provided to the ICC in Reference 4 was inadequate. The ICC disagreed with PGL's decision to not replace the twelve facilities specified in Reference 4, Attachment 1.

In Reference 3, Attachment 2, PGL had provided the ICC documentation obtained from the pipe manufacturer to support the position that the twelve facilities installed are compliant with 192.59 and did not exceed the allowable exposure to ultraviolet light for the polyethylene (PE) material. Furthermore and most importantly, the documentation demonstrated that the installations did not increase the risk to the health and safety of the public.

However, the PE pipe installed at the twelve facilities was produced before the effective date, March 6, 2015, of the recent industry code adoption of D2513-09a. Since the PE pipe was produced before the effective date, PGL will replace the remaining ten identified locations in Reference 4, Attachment 1. Two of the identified locations in Reference 4, Attachment 1 were found to be compliant due to a records correction.

Attachment 1 to this letter provides the replacement schedule for the ten facilities that are to be replaced.

The replacement dates were developed to avoid additional unnecessary cost to customers. The city of Chicago imposes additional fees (Degradation Fee) if a street is disturbed within 5 years of being paved. The replacement due dates are based on the expiration of this Degradation Fee. The replacement dates are one calendar year after the Degradation Fee expires. A two calendar year replacement schedule is provided for locations with expired Degradation Fees.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Webb", written in a cursive style.

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