NORTH SHORE GAS®
NATURAL GAS DELIVERY

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Chicago, IL 60601
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August 24, 2015

Via Email
Mr. Matthew Smith
Acting Manager – Pipeline Safety
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62710

Re: Response to NOA #s 2015-A001-00012 through 2015-A001-00016
Inspection # 2015-P-00240

Reference: Letter from MT Smith (ICC) to CR Matthews (NSG) dated July 23, 2015

Dear Mr. Smith:

In Reference 1, the Illinois Commerce Commission (ICC) issued Notice of Amendments (NOA) to North Shore Gas Company (NSG). The NOAs resulted from a review of NSG's Combined Anti-Drug and Alcohol Misuse Plan (Drug and Alcohol Plan) conducted on March 31, 2015 through April 3, 2015. The review determined that NSG's Drug and Alcohol Plan was inadequate.

NSG is not contesting the NOAs. Below please find a chart identifying the NOA number, the code section, description of the NOA and the page number containing the revised verbiage that should address the ICC's NOA. Please note, the changes in the procedure are highlighted to aid in your review.

NOA #	Code Section	NOA Description	Procedure Location
2015-A001-00012	49 CFR 199.117	Appendix D for FMCSA states that Statistical Summaries must be retained for 5 years, however, this information is not listed in Appendix D for PHMSA Record retention	Page 77
2015-A001-00013	49 CFR 40.31	The Drug and Alcohol Plan does not state that, as the immediate supervisor of an employee being tested, you may not act as the collector when that employee is tested, unless no other collector is available and you are permitted to do so under DOT agency drug and alcohol regulations.	Page 13
2015-A001-00014	49 CFR 40.69	The Drug and Alcohol Plan does not state that, as the collector, you must ensure that	Page 13

		the monitor is the same gender as the employee, unless the monitor is a medical professional (e.g., nurse, doctor, physician's assistant, technologist, or technician licensed or certified to practice in the jurisdiction in which the collection takes place). The monitor can be a different person from the collector and need not be a qualified collector.	
2015-A001-00015	49 CFR 40.25	The Drug and Alcohol Plan must require drug and alcohol testing records from a previous employer if the job applicant has been performing safety-sensitive duties for a DOT-regulated employer.	Page 9, Page 102
2015-A001-00016	49 CFR 40.109	The Drug and Alcohol plan does not stipulate that the laboratory must retain all records pertaining to each employee urine specimen for a minimum of two years and also keep for two years employer-specific data required.	Page 25

Since this response contains the procedure changes, NSG considers this item closed.

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