

ICC Docket No. 14-0224**North Shore Gas Company's Response to
Attorney General Data Requests AG 5.01 – 5.52****Dated: May 14, 2014****REQUEST NO. AG 5.11:**

Please provide disaggregated by zip code for the Company's service territory, the following for the most recent 12 month period available for residential accounts:

- a. The number of accounts receiving a notice of disconnection for nonpayment;
- b. The number of accounts actually being disconnected for nonpayment;
- c. The number of accounts entering into a deferred payment arrangement;
- d. The total number of bills issued; and
- e. The total dollars billed for current service (i.e., not including arrears);
- f. The total dollars of payments received.

RESPONSE:

North Shore objects to this data request on the grounds that the information sought is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of relevant and admissible evidence. Without waiving this objection or its General Objections, North Shore states as follows:

A. The number of accounts receiving a notice of disconnection for nonpayment for the 12 month period May 1, 2013 to April 30, 2014

Company Name	Premise Zip	# Notice of Disconnect
NORTH SHORE GAS	60002	111
	60015	544
	60022	179
	60030	999
	60031	1,422
	60035	747
	60040	173
	60044	302
	60045	397
	60046	590
	60047	41
	60048	545
	60060	970
	60061	537
	60064	1,412
	60069	118
	60073	1
	60075	8
	60079	13
	60083	379
	60085	4,669

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	60087	1,843
	60089	296
	60090	1
	60093	209
	60096	323
	60099	2,226
NORTH SHORE GAS TOTAL		19,055

B. The number of accounts actually being disconnected for nonpayment (by Zip code) for the 12 month period May 1, 2013 to April 30, 2014

Company Name	Premise Zip	# of Accounts Disc for Nonpayment
NORTH SHORE GAS	60002	28
	60015	64
	60022	23
	60030	180
	60031	227
	60035	97
	60040	25
	60044	46
	60045	58
	60046	64
	60047	6
	60048	95
	60060	137
	60061	89
	60064	277
	60069	12
	60075	2
	60079	3
	60083	47
	60085	749

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	60087	232
	60089	44
	60093	28
	60096	46
	60099	359
Total		2,938

C. The number of accounts entering into a deferred payment arrangement for the 12 month period May 1, 2013 to April 30, 2014;

Company Name	Premise Zip	# Accounts on DPA's
NORTH SHORE GAS	60002	43
	60015	155
	60022	37
	60030	376
	60031	511
	60035	228
	60040	69
	60044	77
	60045	91
	60046	223
	60047	12
	60048	151
	60060	346
	60061	183
	60064	598
	60069	30
	60073	1
	60075	3
	60079	7
	60083	147

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	60085	1,889
	60087	747
	60089	78
	60093	37
	60096	146
	60099	1,045
Total		7,230

D. The total number of bills issued; and E. The total dollars billed for current service (i.e., not including arrears) for the 12 month period May 1, 2013 to April 30, 2014;

Company Name	Premise Zip	# Accounts	Dollars Billed
NORTH SHORE GAS	60002	12,450	\$1,445,298.67
	60015	119,034	\$16,066,968.26
	60022	40,119	\$8,518,958.08
	60030	139,132	\$13,763,579.84
	60031	169,450	\$16,678,151.33
	60035	139,941	\$22,811,591.04
	60037	2,642	\$219,893.49
	60040	17,988	\$2,018,700.24
	60044	51,838	\$6,418,992.03
	60045	92,096	\$18,462,549.72
	60046	74,682	\$7,552,950.96
	60047	12,152	\$1,997,652.89
	60048	124,611	\$15,260,362.35
	60060	109,180	\$10,607,713.16
	60061	106,315	\$10,346,593.93
	60064	52,645	\$5,420,231.22
	60069	31,217	\$4,420,953.52
	60073	157	\$14,557.14
	60075	627	\$58,080.32
	60079	1,039	\$100,698.22
	60083	45,771	\$4,885,829.58
	60085	218,734	\$22,186,039.08
	60087	111,549	\$10,222,438.04
	60088	7,942	\$811,740.46
	60089	61,553	\$5,829,336.31
	60090	39	\$3,200.80
	60093	54,245	\$11,551,186.05

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	60096	35,777	\$3,640,704.47
	60099	120,719	\$11,914,617.22
Total			\$233,229,568.42

F. The total dollars of payments received for the 12 month period May 1, 2013 to April 30, 2014;

Company Name	Premise Zip	Payment
NORTH SHORE GAS	60002	\$11,240.00
	60015	\$111,354.00
	60022	\$37,587.00
	60030	\$126,518.00
	60031	\$152,402.00
	60035	\$130,040.00
	60037	\$2,531.00
	60040	\$15,848.00
	60044	\$47,000.00
	60045	\$86,285.00
	60046	\$67,927.00
	60047	\$11,597.00
	60048	\$118,314.00
	60060	\$99,853.00
	60061	\$100,675.00
	60064	\$39,980.00
	60069	\$29,556.00
	60073	\$137.00
	60075	\$446.00
	60079	\$882.00
	60083	\$39,797.00
	60085	\$178,013.00
	60087	\$93,547.00
	60088	\$7,684.00
	60089	\$56,526.00
	60090	\$27.00
	60093	\$50,335.00
	60096	\$28,978.00
	60099	\$96,977.00
NORTH SHORE GAS TOTAL		\$1,742,056.00

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REQUEST NO. AG 5.11:

Please provide disaggregated by zip code for the Company's service territory, the following for the most recent 12 month period available for residential accounts:

- a. The number of accounts receiving a notice of disconnection for nonpayment;
- b. The number of accounts actually being disconnected for nonpayment;
- c. The number of accounts entering into a deferred payment arrangement;
- d. The total number of bills issued; and
- e. The total dollars billed for current service (i.e., not including arrears);
- f. The total dollars of payments received.

RESPONSE:

Peoples Gas objects to this data request on the grounds that the information sought is not relevant to the subject matter of this proceeding and is not reasonably calculated to lead to the discovery of relevant and admissible evidence. Without waiving this objection or its General Objections, Peoples Gas states as follows:

- A. The number of accounts receiving a notice of disconnection for nonpayment for the 12 month period May 1, 2013 to April 30, 2014;

Company Name	Premise Zip	# Notice of Disconnect
PEOPLES GAS LIGHT AND COKE	60601	2
	60603	1
	60604	4
	60605	311
	60606	26
	60607	1,004
	60608	6,673
	60609	7,327
	60610	727
	60611	44
	60612	4,513
	60613	2,023
	60614	1,930
	60615	3,732
	60616	2,007
	60617	10,234
	60618	6,865

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	60619	11,043
	60620	10,942

A. The number of accounts receiving a notice of disconnection for nonpayment for the 12 month period May 1, 2013 to April 30, 2014 (cont.);

Company Name	Premise Zip	Notice of Disconnect
PEOPLES GAS LIGHT AND COKE	60621	5,007
	60622	5,025
	60623	10,725
	60624	6,434
	60625	4,539
	60626	3,169
	60628	10,559
	60629	9,820
	60630	2,809
	60631	874
	60632	6,460
	60633	738
	60634	3,533
	60636	5,887
	60637	6,645
	60638	2,598
	60639	7,888
	60640	2,570
	60641	4,416
	60642	1,569
	60643	5,857
	60644	7,367
	60645	2,762
	60646	1,053
	60647	7,831
	60649	7,566

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A. The number of accounts receiving a notice of disconnection for nonpayment for the 12 month period May 1, 2013 to April 30, 2014 (cont.);

Company Name	Premise Zip	Notice of Disconnect
PEOPLES GAS LIGHT AND COKE	60650	1
	60651	8,851
	60652	3,722
	60653	4,480
	60654	176
	60655	1,429
	60656	618
	60657	2,376
	60659	2,305
	60660	1,448
	60661	102
	60707	1,065
	60827	393
PEOPLES GAS LIGHT AND COKE TOTAL		230,075

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B. The number of accounts actually being disconnected for nonpayment for the 12 month period May 1, 2013 to April 30, 2014;

Company Name	Premise Zip	# of Accounts Disc for Nonpayment
PEOPLES GAS LIGHT AND COKE	60601	1
	60605	43
	60606	2
	60607	267
	60608	1,602
	60609	3,405
	60610	266
	60611	7
	60612	2,129
	60613	319
	60614	389
	60615	985
	60616	580
	60617	4,374
	60618	1,400
	60619	4,082
	60620	4,656
	60621	2,849
	60622	798
	60623	4,971
	60624	3,290
	60625	721
	60626	574
	60628	4,992
	60629	3,613

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B. The number of accounts actually being disconnected for nonpayment for the 12 month period May 1, 2013 to April 30, 2014 (cont.);

Company Name	Premise Zip	# of Accounts Disc for Nonpayment
	60630	653
	60631	185
	60632	2,070
	60633	321
	60634	698
	60636	3,356
	60637	2,454
	60638	922
	60639	1,982
	60640	403
	60641	1,112
	60642	315
	60643	2,605
	60644	2,375
	60645	637
	60646	243
	60647	1,557
	60649	2,054
	60651	2,643
	60652	889
	60653	1,804
	60654	37
	60655	359
	60656	129
	60657	338
	60659	387
	60660	204
	60661	13
	60707	184
	60827	231
Total Disconnects		77,475

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c. The number of accounts entering into a deferred payment arrangement for the 12 month period May 1, 2013 to April 30, 2014;

Company Name	Premise Zip	# Accounts on DPA's
PEOPLES GAS LIGHT AND COKE	60601	1
	60604	2
	60605	65
	60606	4
	60607	162
	60608	2,136
	60609	2,708
	60610	170
	60611	4
	60612	1,760
	60613	290
	60614	257
	60615	1,095
	60616	605
	60617	4,300
	60618	1,825
	60619	3,934
	60620	4,405
	60621	1,814
	60622	1,196
	60623	3,653
	60624	2,306
	60625	939
	60626	572
	60628	4,678
	60629	3,763
	60630	888
	60631	264
	60632	2,373
	60633	289
	60634	1,220
	60636	2,390
	60637	2,087
	60638	1,009
	60639	2,861
	60640	451
	60641	1,353

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c. The number of accounts entering into a deferred payment arrangement for the 12 month period May 1, 2013 to April 30, 2014 (cont.);

Company Name	Premise Zip	# Accounts on DPA's
	60642	348
	60643	2,774
	60644	2,487
	60645	674
	60646	314
	60647	2,101
	60649	2,180
	60651	3,160
	60652	1,905
	60653	1,796
	60654	13
	60655	473
	60656	209
	60657	290
	60659	573
	60660	260
	60661	9
	60707	431
	60827	193
Total		78,019

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- d. The total number of bills issued; and
e. The total dollars billed for current service (i.e., not including arrears) for the 12 month period May 1, 2013 to April 30, 2014;

Company Name	Premise Zip	Bills Issued	Dollars Billed
PEOPLES GAS LIGHT AND COKE	60601	429	\$35,907.40
	60603	131	\$20,211.84
	60604	946	\$40,576.74
	60605	44,223	\$3,402,498.82
	60606	7,250	\$362,428.85
	60607	120,450	\$9,045,346.30
	60608	325,972	\$32,074,706.09
	60609	245,135	\$27,930,295.24
	60610	71,182	\$6,683,574.75
	60611	6,257	\$679,590.68
	60612	146,339	\$15,455,896.09
	60613	184,127	\$16,164,366.56
	60614	271,007	\$29,590,534.11
	60615	125,515	\$12,206,595.88
	60616	173,384	\$16,989,845.11
	60617	337,069	\$44,063,462.68
	60618	429,832	\$43,813,184.45
	60619	283,491	\$35,966,450.64
	60620	286,099	\$39,622,631.97
	60621	104,798	\$14,904,508.86
	60622	321,892	\$31,397,442.80
	60623	309,170	\$35,030,399.12
	60624	129,785	\$16,760,465.63
	60625	295,395	\$28,880,960.62
	60626	149,447	\$10,878,313.81
	60628	292,154	\$41,043,045.46
	60629	355,863	\$46,760,562.58
	60630	235,458	\$28,199,545.39
	60631	122,495	\$15,639,466.67
	60632	294,133	\$35,241,626.93
	60633	40,378	\$4,585,012.83

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- d. The total number of bills issued; and
e. The total dollars billed for current service (i.e., not including arrears) for the 12 month period May 1, 2013 to April 30, 2014 (cont.) ;

Company Name	Premise Zip	Bills Issued	Dollars Billed
	60634	289,840	\$36,634,479.73
	60636	131,424	\$20,186,569.35
	60637	152,738	\$16,187,168.14
	60638	220,637	\$25,899,907.28
	60639	284,621	\$34,620,533.17
	60640	202,141	\$16,493,100.41
	60641	260,440	\$30,552,289.44
	60642	109,319	\$9,595,699.94
	60643	217,890	\$33,687,470.12
	60644	161,402	\$20,411,667.24
	60645	146,709	\$15,732,241.60
	60646	132,011	\$17,524,652.37
	60647	425,636	\$42,122,259.88
	60649	160,881	\$16,356,360.37
	60650	26	\$7,451.51
	60651	234,559	\$30,562,623.93
	60652	157,187	\$20,776,480.89
	60653	115,335	\$12,376,140.11
	60654	30,146	\$2,126,790.22
	60655	129,353	\$15,993,422.73
	60656	86,787	\$10,543,925.93
	60657	273,272	\$24,903,614.90
	60659	130,055	\$14,398,481.51
	60660	95,574	\$8,264,464.77
	60661	17,154	\$927,660.24
	60706	13	\$4,068.82
	60707	63,843	\$8,591,737.35
	60827	9,260	\$1,087,521.82
Total			\$1,130,038,238.67

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F. The total dollars of payments received for the 12 month period May 1, 2013 to April 30, 2014.

Company Name	Premise Zip	Payments
PEOPLES GAS LIGHT AND COKE	60601	\$399.00
	60603	\$112.00
	60604	\$879.00
	60605	\$38,829.00
	60606	\$6,505.00
	60607	\$105,139.00
	60608	\$252,475.00
	60609	\$187,596.00
	60610	\$61,021.00
	60611	\$5,622.00
	60612	\$113,592.00
	60613	\$161,725.00
	60614	\$244,200.00
	60615	\$87,636.00
	60616	\$138,754.00
	60617	\$279,929.00
	60618	\$362,958.00
	60619	\$216,522.00
	60620	\$227,714.00
	60621	\$72,131.00
	60622	\$268,814.00
	60623	\$228,453.00
	60624	\$89,597.00
	60625	\$253,938.00

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F. The total dollars of payments received for the 12 month period May 1, 2013 to April 30, 2014 (cont.)

Company Name	Premise Zip	Payments
	60626	\$121,744.00
	60628	\$248,806.00
	60629	\$292,738.00
	60630	\$208,052.00
	60631	\$114,278.00
	60632	\$244,570.00
	60633	\$34,684.00
	60634	\$261,144.00
	60636	\$96,630.00
	60637	\$103,810.00
	60638	\$201,479.00
	60639	\$232,091.00
	60640	\$175,389.00
	60641	\$224,979.00
	60642	\$91,720.00
	60643	\$192,937.00
	60644	\$118,555.00
	60645	\$124,097.00
	60646	\$118,998.00
	60647	\$343,755.00
	60649	\$105,931.00
	60650	\$24.00
	60651	\$183,800.00
	60652	\$138,396.00
	60653	\$82,880.00
	60654	\$26,735.00
	60655	\$117,865.00
	60656	\$80,941.00
	60657	\$245,947.00
	60659	\$111,075.00
	60660	\$83,375.00
	60661	\$14,992.00
	60706	\$12.00
	60707	\$56,359.00
	60827	\$6,686.00
PGL Payments Total		\$8,210,014.00