

**PEOPLES GAS SYSTEM  
 DOCKET NO. 140183-GU  
 STAFF'S FIRST DATA REQUEST  
 REQUEST NO. 1  
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 FILED: OCTOBER 27, 2014**

1. How many miles of mains and services, listed by type, have been replaced since the approval of the Cast Iron/Bare Steel Replacement Rider (CI/BSR) through the end of September 2014?
  - A. a. When Peoples filed its original petition in Docket No. 110320-GU requesting approval of the cast iron / bare steel replacement rider (CI/BSR), Peoples projected the replacement of the total number of known cast iron / bare steel miles in its system as reported in the U.S. Department of Transportation "Annual report for year-end 2010, Gas Distribution System" report of 156 miles of cast iron and 411 miles of bare steel for a total of 567 system miles. During 2011 and 2012, while the docket was pending before the Commission, Peoples replaced 56 miles of cast iron and 57 miles of bare steel, which reduced the amount of cast iron and bare steel miles remaining in the system to 100 and 354 miles, respectively. This represented a combined total of 454 miles of eligible infrastructure to be replaced beginning January 2013. The total miles replaced since the inception of the accelerated approved CI/BSR program in 2013 are as follows:

Year	Replaced Cast Iron	Replaced Bare Steel	Remaining Cast Iron at Year-End	Remaining Bare Steel at Year End	Total Remaining
2012			100	354	454
2013	14	46	86	308	394
*2014	9	59	77	249	326
2015	13	35	64	214	278
2016	13	35	51	179	230
2017	13	35	38	144	182
2018	13	35	25	109	134
2019	13	35	12	74	86
2020	12	35	0	39	39
2021	0	35	0	4	4
2022	0	4	0	0	0

\*9+3 Forecast

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The total “replaced cast iron and bare steel” columns do not include “other” materials included in the rider that may be part of a replacement project. Other materials represent approximately 6 miles since inception of the program. This would include sections of pipe other than cast iron / bare steel which would have to be replaced as part of the replacement of cast iron / bare steel during a replacement project.

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- 2.** How many miles of mains and services are projected to be replaced in the 4th Quarter of 2014?
  - A.** See response to Interrogatory No. 1.

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- 3.** How many miles of mains and services are projected for replacement in 2015?
  - A.** See response to Interrogatory No. 1

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- 4.** How many miles of mains and services, listed by type, remain to be replaced as of your response to this Data Request?
  - A.** See response to Interrogatory No. 1

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5. Order No. PSC-12-0476-TRF-GU, approving the CI/BSR program, noted "Peoples [Gas System] explained that it believes that a 10-year time frame is a reasonable projection to complete the replacement program." Is Peoples Gas System still planning to complete the CI/BSR program under the referenced 10-year time frame? If not, please explain.
  - A. Yes, see response to Interrogatory No. 1.