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PGS's Response to Staff's  
Third Set of Interrogatories,  
Nos. 10-12

20220004-GU Staff Hearing Exhibits 000060

**PEOPLES GAS SYSTEM  
DOCKET NO. 20220004-GU  
STAFF'S THIRD SET OF  
INTERROGATORIES  
INTERROGATORY NO. 10  
BATES PAGE(S): 1  
FILED: OCTOBER 12, 2022**

- 10.** Please refer to the Direct Testimony of Witness Karen Bramley, filed on August 5, 2022, Page 5, Lines 9-22, to answer the following:
- A. Describe the promotional activities that have occurred in 2022 year to date or are planned to occur in the fourth quarter of 2022 in order to launch or promote the Commercial Walkthrough Audit program.
  - B. How many participants are projected to enroll in the Commercial Walkthrough Audit in 2022?
  - C. How many participants are expected to enroll in the Commercial Walkthrough Audit in 2023?
- A.**
- A. Peoples is in contract negotiations with an energy company to perform the Commercial Walkthrough Energy Audit. Promotional activities for the program are planned to begin once a launch date has been set. Peoples plans to promote the audit through its website, social media, email marketing, and print collateral, such as an informational flier to be distributed by Peoples' field personnel.
  - B. As shown on Exhibit KLB-2, Schedule C-5, Page 5, Peoples is projecting 12 customers to participate in the Commercial Walkthrough Audit in 2022.
  - C. As shown on Exhibit KLB-2, Schedule C-5, Page 5, Peoples is projecting 48 customers to participate in the Commercial Walkthrough Audit in 2023.

11. Please refer the Direct Testimony of Witness Karen Bramley, filed on August 5, 2022, Exhibit KLB-2, Schedule C-3, Page 2 of 4, and Schedule C-2, Page 2 of 2, to answer this question. Exhibit KLB-2, Schedule C-3, Page 2 of 4 [2022 Actual/Estimated Schedule], reflects that PGS projects the Commercial New Construction Program will incur costs of \$719,160 in 2022. Exhibit KLB-2, Schedule C-2, Page 2 of 2 [2023 Projection Schedule], reflects that the same program has estimated costs of \$553,200.

Please explain why the 2023 projected costs are 23 percent lower than the 2022 actual and estimated expenses.

- A. Peoples projected a decrease in participation in the Commercial New Construction Program between 2022 and 2023 because the program is experiencing its highest level of participation historically in 2022. In 2022, over 250 rebates have been paid in the program, compared to the program's historical annual average of 93. Peoples contacted field personnel to inquire about the high level of participation in 2022. Field personnel reported that the supply chain issues that affected the market in 2021 have, for the most part, subsided and Peoples believes delayed demand from 2021 into 2022 is contributing to higher participation levels. Peoples does not anticipate this demand to continue at the current level through the end of 2023. Therefore, to project July-December 2022 and 2023, Peoples used a midpoint monthly participation level between that of 2022 and the 3-year average for the program. Peoples will continue to monitor activity and trends within the Commercial appliance market.

12. Please refer to Peoples Gas System's Witness Karen Bramley's Direct Testimony filed August 6, 2021 in Docket No. 20210004-GU (2022 Projection schedule), Exhibit KLB-2, Schedule C-1, Page 1 of 1, and also to Peoples Gas System's Witness Karen Bramley's Direct Testimony filed August 5, 2022 in Docket No. 20220004-GU (2023 Projection schedule), Exhibit KLB-2, Schedule C-1, Page 1 of 1. For the CSLS Rate Schedule, the 2023 Projection schedule indicates that 0 bills and 512,405 therms are forecasted for the year. Referring to the same information in the 2022 Projection schedule, 336 bills and 492,675 therms were forecasted for the year.

- A. Comparing the 2023 and 2022 Projection schedules, please explain the variance of 336 forecasted annual number of bills for CSLS Rate Schedule between the two projection schedules.
- B. Identify which conservation program(s) the Company expects to provide to the customers receiving service under the CSLS Rate Schedule in 2022 and 2023, and provide a breakdown of the projected annual therms for 2022 and 2023 by program.

- A. A. Schedule C-1 reflects the calculation of ECCR charges by rate class. The entry of the number of bills for each rate class in this schedule is used to calculate revenues by multiplying the number of bills by the appropriate customer charge. Customers taking service under the CSLS Rate Schedule do not pay a customer charge. Thus, there is no resulting revenue for this class, no matter the annual number of bills.

The Company elected to enter the actual number of projected bills – 336- in Docket No. 2021004-GU, in the 2022 Projection Schedule, to provide more information. On August 25, 2021, staff issued Interrogatory No. 8A directed to the 2022 Projection Schedule, seeking an explanation of “the variance of 336 forecasted bills for CSLS Rate Schedule, for the January through December, 2022 period.” In light of this request, and in an effort to reduce potential confusion in the current filing, Peoples elected to enter “0” for the number of CSLS bills in its 2023 Projection Schedule.

- B. CSLS consists of Peoples' Commercial Street Lighting Service customers. The Commercial Retrofit Electric Replacement Program, which encourages customers to install energy efficient technologies that are not covered by Peoples' other DSM programs, is available to customers in this rate class. Currently, Peoples does not project any CSLS customers to participate in

**PEOPLES GAS SYSTEM  
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its DSM programs in 2022 or 2023, therefore no therm savings are projected for these customers.