

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

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ILLINOIS POWER AGENCY

Petition for Approval of Initial  
Procurement Plan

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Docket No. 08-0519

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**ILLINOIS POWER AGENCY'S MOTION SEEKING AN  
ENLARGEMENT OF TIME TO FILE ITS VERIFIED RESPONSE TO  
THE OBJECTIONS TO ITS INITIAL PROCUREMENT PLAN AND ITS  
VERIFICATION TO THE OCTOBER 20, 2008 PROCUREMENT PLAN**

The Illinois Power Agency (“IPA”), through its attorney Kelley Drye & Warren, LLP, pursuant to Section 200.190 of the Commission’s Rules of Practice, 83 Ill.Adm.Code § 200.190, hereby requests an enlargement of time to file its Verification to the October 20, 2008 Procurement Plan (“Plan Verification”), and its Verified Response to the Objections to the IPA’s Initial Procurement Plan (“Verified Response”). The IPA states as follows in support of its motion.

1. On October 20, 2008, the IPA submitted to the Illinois Commerce Commission (“Commission”) its Petition seeking approval of the IPA’s Power Procurement Plan for the period June 2009 through May 2014 (“Procurement Plan” or “Plan”). Parties filed objection and comments to the Plan on October 27, 2008.

2. On November 5, 2008, Administrative Law Judge Jones ordered that any party wishing to respond to the October 27, 2008 objections may do so on or before 5:00 p.m. on November 12, 2008. Judge Jones further ordered that the Illinois Power Agency file a verification to it Procurement Plan, and that this verification also be filed on or before 5:00 p.m. on November 12, 2008.

3. Despite its best efforts, the IPA did not file its Verified Response or its Plan Verification until 5:01 p.m. on November 5, 2008. (See the attached filing receipt.)

4. Copies of the Verified Response and the Plan Verification were emailed to the parties of record at or about 5:04 p.m. on November 5, 2008.

5. The IPA hereby requests that the Commission grant an enlargement of time to permit the IPA to file the Verified Response and the Plan Verification *instanter*.

6. No party will be prejudiced by the granting of this motion.

Wherefore, the Illinois Power Agency respectfully requests that the Commission grant the IPA an enlargement of time to file its Verified Response and its Plan Verification, and that the pleadings attached hereto be accepted *instanter*.

Dated: November 12, 2008

Respectfully submitted,

Illinois Power Agency

By: 

One of its Attorneys

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**Submission Description**

VERIFIED RESPONSE OF THE ILLINOIS POWER AGENCY  
TO OBJECTIONS TO ITS INITIAL POWER PROCUREMENT  
PLAN

**Session Began**

November 12, 2008 4:53PM

**Documents Uploaded**

## Response

**DESCRIPTION:**

VERIFIED RESPONSE OF THE ILLINOIS POWER AGENCY TO OBJECTIONS TO ITS  
INITIAL POWER PROCUREMENT PLAN

**FILED IN:**

08-0519

**FILES:****1. VERIFIED RESPONSE OF THE ILLINOIS POWER AGENCY TO OBJECTIONS TO ITS  
INITIAL POWER PROCUREMENT PLAN**

Public Copy: d:\temp\IPA Verified Response to Objections with Exhibits.pdf [88 KB]

**2. Verification of Mark Pruitt to the IPA's Response**

Public Copy: d:\temp\IPA Pruitt Verification to Response.pdf [54 KB]

**3. Notice of Filing and Certificate of Service to the IPA's Response to Objections**

Public Copy: d:\temp\IPA - NOF COS Verified Response to Objections.pdf [37 KB]

## Verified Statement

**DESCRIPTION:**

Verification of Mark Pruitt to the IPA's October 20, 2008 Plan

**FILED IN:**

08-0519

FILES:

**1. Verification of Mark Pruitt to the IPA's October 20, 2008 Plan**  
Public Copy: d:\temp\IPA Pruitt Verification to Oct 20 Plan.pdf [59 KB]

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**2. Notice of Filing and Certificate of Service to Mark Pruitt's Verification of the October 20, 2008 Plan**  
Public Copy: d:\temp\IPA - NOF COS Pruitt Verification to Plan.pdf [37 KB]

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**NOTICE OF FILING**

Please take notice that on November 12, 2008, we caused to be filed via electronic mail with the Illinois Commerce Commission, **ILLINOIS POWER AGENCY'S MOTION SEEKING AN ENLARGEMENT OF TIME TO FILE ITS VERIFIED RESPONSE TO THE OBJECTIONS TO ITS INITIAL POWER PROCUREMENT PLAN**. A copy of the foregoing documents are hereby served upon you.



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Henry T. Kelly, attorney for the  
Illinois Power Agency

**CERTIFICATE OF SERVICE**

I, Henry T. Kelly on oath state that I served this **Notice of Filing** and a copy of the **ILLINOIS POWER AGENCY'S MOTION SEEKING AN ENLARGEMENT OF TIME TO FILE ITS VERIFIED RESPONSE TO THE OBJECTIONS TO ITS INITIAL POWER PROCUREMENT PLAN** on the attached service list via electronic mail on November 12, 2008.



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