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ILLINOIS
COMMERCE COMMISSION

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

WPS Energy Services, Inc. :
: :
: Docket No. 00-0199
Petition for certification as an alternative retail :
electric supplier. :

**ILLINOIS ENERGY ASSOCIATION'S
PETITION FOR LEAVE TO INTERVENE**

The Illinois Energy Association ("Energy Association") hereby petitions the Hearing Examiner for leave to intervene in Docket No. 00-0199. In support of its Petition, the Energy Association states as follows:

1. The Energy Association is a not-for-profit organization formed under the laws of the State of Illinois, with its offices at 509 Myers Building, 1 West Old State Capitol Plaza, Springfield, Illinois. The Energy Association is a trade organization representing investor-owned electricity and combination electricity and natural gas companies serving customers in the state of Illinois. The Association was founded in 1994 and consists of the following member companies: Alliant Energy, based in Dubuque, Iowa; AmerenCIPS of Springfield; AmerenUE, headquartered in St. Louis; Central Illinois Light Company (CILCO) of Peoria; Commonwealth Edison Company of Chicago; Illinois Power Company, based in Decatur; MidAmerican Energy Company, headquartered in Des Moines, Iowa; and Mt. Carmel Public Utility Company of Mt. Carmel. The Energy Association serves as a vehicle to develop industry positions and policies on public policy issues.

2. On March 16, 2001, the Commission reopened this docket to review its April 18, 2000 order granting an ARES certificate to WPS Energy Services, Inc. Based on the Commission's order reopening the docket, it appears that this docket may have a significant

effect on the certification of ARES generally. The Energy Association and its members have an interest in the Commission's determinations of the issues raised in the Commission's March 16, 2001 order. The Commission's ultimate resolution of this docket will have a significant effect on the Energy Association and its members.

3. Attached please find a February 14, 2001 letter from the Energy Association to Chairman Mathias of the Illinois Commerce Commission underscoring the importance of this issue.

4. Copies of all pleadings, notices, and correspondence in this Docket should be sent to the following address: 509 Myers Building, 1 West Old State Capitol Plaza, Springfield, Illinois 62701

5. The Energy Association consents to service by electronic means in this Docket.

WHEREFORE, Petitioner Illinois Energy Association respectfully requests that the Hearing Examiner grant it leave to intervene and participate in this Docket.

Dated: March 27, 2001

Respectfully submitted,

ILLINOIS ENERGY ASSOCIATION

By 
JEFFREY A. FERRY

JEFFREY A. FERRY
Reg. NO. 6216056
Director of Governmental Affairs
Illinois Energy Association
509 Myers Building
1 West Old State Capitol Plaza
Springfield, Illinois 62701

VERIFICATION

I, JEFFREY A. FERRY, first being duly
(Name)
sworn upon oath depose and say that I am Director of Govt Affairs
(Title)
of ILLINOIS ENERGY ASSOCIATION Association formed
(Type of Entity)
under the laws of the state of Illinois; that I have read
the above and foregoing petition by me subscribed and know the contents
thereof; that said contents are true in substance and in fact, except as to
those matters stated upon information and belief, and as to those, I believe
same to be true.

Jeff A Ferry
Name

Director of Government Affairs
Title

Subscribed and sworn to before me
this 27th day of March,
2007.

Donna M. Caton
Notary Public

