

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

AMEREN ILLINOIS COMPANY)	
Proposed general increase in electric delivery service rates.)	Docket No. 11-0279
)	
)	(cons.)
)	
AMEREN ILLINOIS COMPANY)	
Proposed general increase in gas delivery service rates.)	Docket No. 11-0282
)	

**PETITION OF THE COMMERCIAL GROUP
TO INTERVENE AS PARTY**

The Commercial Group hereby petitions the Illinois Commerce Commission (“Commission”) to intervene and be made a party of record in the above-captioned dockets. The Commercial Group states the following grounds in support of its petition:

1. The Commercial Group is an ad hoc association of retail companies that own and operate retail stores within Ameren Illinois Company’s (“AIC”) service territory. These companies include Best Buy Co., Inc., J.C. Penney Corporation, Inc., Macy’s, Inc., Sam’s West, Inc., and Wal-Mart Stores, Inc. In addition, other companies may join the group in this case, which companies shall be fully identified in any testimony to be provided in this proceeding. The Commercial Group purchases large quantities of electricity from AIC, the rates of which will be affected by this proceeding. Accordingly, the Commercial Group has a direct and material interest in the issues to be addressed and resolved by the Commission in this consolidated docket, and these interests cannot be adequately represented by another party in this proceeding.
2. Service and correspondence regarding this proceeding should be sent to counsel for the Commercial Group, which is also submitting a Motion for Leave to Appear herewith:

Alan R. Jenkins
Jenkins at Law, LLC
2265 Roswell Road
Suite 100
Marietta, GA 30062
Tel. No. (770) 509-4866
Email: aj@jenkinsatlaw.com

3. The Commercial Group agrees to accept service by electronic means as provided under Section 200.1050 of the Commission Rules of Practice.

4. The Commercial Group agrees to accept the record as it exists at the time of its intervention.

5. The Commercial Group desires to be an active party.

WHEREFORE, for the reasons set forth above, the Commercial Group respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

/S/ Alan R. Jenkins
Alan R. Jenkins
Jenkins at Law, LLC
2265 Roswell Road
Suite 100
Marietta, GA 30062
Tel. No. (770) 509-4866
Email: aj@jenkinsatlaw.com

Attorneys for The Commercial Group

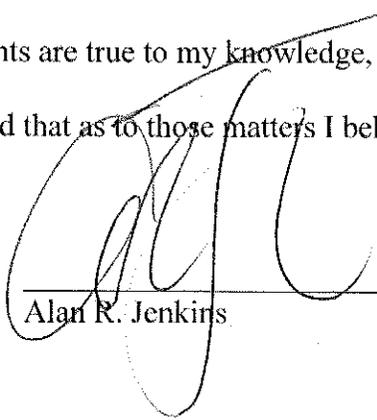
April 15, 2011

VERIFICATION

STATE OF GEORGIA)

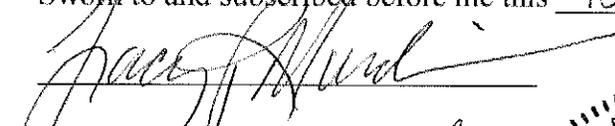
COUNTY OF COBB)

I, Alan R. Jenkins, do hereby swear or affirm that I have read the **Petition of the Commercial Group to Intervene as Party** and the **Motion for Leave to Appear** and know the contents thereof; and that the contents are true to my knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.



Alan R. Jenkins

Sworn to and subscribed before me this 15 day of April, 2011.



Notary Public for the State of Georgia

My Commission Expires: 10/2/11

