

**ORIGINAL**

**OFFICIAL FILE  
ILLINOIS COMMERCE COMMISSION**

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ILLINOIS COMMERCE COMMISSION  
2011 APR 18 11:11

AGL Resources Inc., Nicor Inc., and )  
Northern Illinois Gas Company d/b/a )  
Nicor Gas Company )  
 )  
Application for Approval of a )  
Reorganization pursuant to Section )  
7-204 of the Illinois Public Utilities Act )

CHIEF CLERK'S OFFICE

ICC Docket No. 11-0046

**VERIFIED PETITION TO INTERVENE ON BEHALF OF  
THE MANCHESTER GROUP, LLC**

The Manchester Group, LLC ("Manchester"), by and through its counsel, pursuant to 83 Illinois Administrative Code Section 200.200, hereby petitions the Illinois Commerce Commission ("Commission") for leave to intervene in the above-captioned proceeding and, in support of this Petition, states as follows:

1. Manchester previously intervened in ICC Docket No. 09-0301 and submitted testimony in that proceeding relating to warranty product issues associated with the contested affiliate agreement issues in that proceeding.

2. Although Manchester is not aware of any written order either in this proceeding or in Docket No. 09-0301, Manchester understands that the affiliate agreement issues previously being litigated in Docket No. 09-0301 may be addressed in this proceeding.

3. Manchester markets and sells warranty products to utility customers. Nicor Services, an affiliate of Northern Illinois Gas Company ("Nicor Gas"), also markets and sells a warranty product, and aspects of the Nicor Service's warranty product are at issue in this proceeding. In addition, Nicor Gas has introduced testimony in Docket No. 09-0301 specifically discussing the competing Manchester warranty product, and both Nicor Gas and the Commission

Staff have propounded Data Requests in Docket No. 09-0301 seeking information about Manchester.

4. The discussion of Manchester's product offerings and the possible impact of a ruling in the case on Manchester's ability to offer warranty products in the future on a fair and competitively neutral basis in Nicor Gas's service territory give Manchester a significant legal interest in the above-captioned matter.

5. Manchester wishes to participate in the instant proceeding as a party, presenting positions on issues, and making recommendations regarding the issues raised in this proceeding.

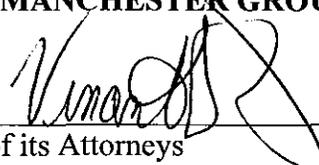
6. The granting of the instant Petition to Intervene will not delay this proceeding. Manchester accepts the record as it exists upon the submission of this Petition.

7. Manchester agrees to accept service by electronic means as provided for in Section 200.1050 of the Commission's Rules of Practice. (83 Adm. Code 200.1050.) Please include on the service list the following representatives of Manchester:

Vincent A. Parisi  
General Counsel  
Interstate Gas Supply, Inc.  
6100 Emerald Parkway  
Dublin, OH 43016  
Phone: (614) 659-5055  
vparisi@igsenergy.com

WHEREFORE, The Manchester Group, LLC respectfully requests that the Commission grant it leave to intervene and participate in this proceeding, and that the Commission grant such further additional relief as it deems appropriate.

Respectfully submitted,  
**THE MANCHESTER GROUP, LLC**

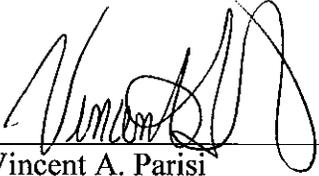
By:   
One of its Attorneys

Vincent A. Parisi  
General Counsel  
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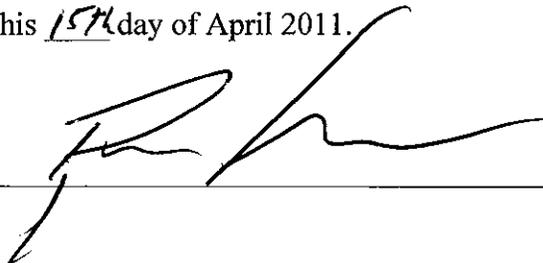
STATE OF Ohio )  
COUNTY OF Franklin ) SS

**VERIFICATION**

Vincent A. Parisi, being first duly sworn, on oath deposes and says that he is an attorney for The Manchester Group, LLC, that he has read the foregoing Verified Petition to Intervene, that he knows of the contents thereof, and that the same is true to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
Vincent A. Parisi

Subscribed and sworn to me  
this 15<sup>th</sup> day of April 2011.

  
\_\_\_\_\_

**RONALD L. WATERMAN**  
**Attorney At Law**  
**Notary Public, State of Ohio**  
**My Commission Has No Expiration**  
**Section 147.03 R.C.**