

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

ILLINOIS POWER AGENCY	:	
	:	
Petition for Approval of the 220 ILCS 5/16-111.5(d)	:	Docket No. 11-0660
Procurement Plan	:	
	:	
	:	

**PETITION TO INTERVENE
OF THE ENVIRONMENTAL LAW & POLICY CENTER**

Pursuant to 83 Ill. Admin. Code 200.200 the Environmental Law & Policy Center (“ELPC”), through its counsel, petitions the Illinois Commerce Commission for leave to intervene in the above-captioned matter. In support of its petition, ELPC states the following:

1. On September 28, 2011, the Illinois Power Agency ("IPA") filed, with the Commission, a Petition for Approval of the 220 ILCS 5/16-111.5(d) Procurement Plan. Accompanying its Petition is a copy of the IPA’s proposed 2012 Power Procurement Plan dated September 28, 2011 (“2012 Procurement Plan”) that covers the procurement of electricity and renewable energy credits for certain customers of Ameren Illinois Company (“Ameren”) and Commonwealth Edison Company ("ComEd") for the period June 2012 through May 2017.
2. ELPC is a not-for-profit organization that works to promote environmentally-sound energy policies in Illinois and throughout the Midwest. ELPC and its members in Illinois have a particular interest in the development and design of the IPA’s Power Procurement Plan and especially the Agency’s Plan for complying with the Illinois Renewable Portfolio Standard. ELPC and its members will be directly and materially affected by the outcome of this proceeding.

3. On September 14, 2011, ELPC filed detailed comments with the IPA pursuant to Section 16-111.5(d) of the Public Utilities Act (“PUA”). Along with many other interested parties, ELPC’s comments recommended the establishment of an additional procurement program for distributed solar renewable energy credits. The IPA modified its Draft Plan in response to these and other comments to include such a program.
4. Although ELPC is not filing an “objection” in this docket pursuant to Section 16.111.5(d)(3), ELPC will file detailed responsive comments and participate fully in this docket, including participation in any hearings, if determined to be necessary and appropriate.
5. ELPC agrees to accept service by electronic means as provided for in Section 200.1050 of the Commission’s Rules of Practice. (83 Ill. Adm. Code 200.1050).

WHEREFORE, for the above stated reasons, ELPC requests that leave to intervene be granted by the Commission and it be made a party to this proceeding, and requests that all orders, notices, correspondence, pleadings, testimony and other documents be served upon the undersigned.

Dated: October 3, 2011

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brad Klein". The signature is written in a cursive style with a horizontal line underneath it.

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Docket No. 11-0660

NOTICE OF FILING

To: (attached service list):

Please take note that on October 3, 2011, I submitted the above Petition to Intervene of The Environmental Law & Policy Center for filing in the above-captioned matter, via e-Docket, with the Clerk of the Illinois Commerce Commission.



Brad Klein
Staff Attorney
Environmental Law & Policy Center

CERTIFICATE OF SERVICE

I, Brad Klein, hereby certify that the foregoing document was served to all parties of record listed on the attached service list by e-mail on October 3, 2011. Paper copies will be provided upon request.



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