

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
)	ICC Docket No. 11-0710
In re Proposed Contracts between Chicago)	
Clean Energy, Inc. and Ameren Illinois Company)	
and Between Chicago Clean Energy, Inc. and)	
Northern Illinois Gas Company for the Purchase)	
and Sale of Substitute Natural Gas Under the))	
Provisions of Illinois Public Act 97-0096.)	

**VERIFIED PETITION TO INTERVENE
ON BEHALF OF THE SOUTH CHICAGO CHAMBER OF COMMERCE**

The South Chicago Chamber of Commerce (“The Chamber”), 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. The South Chicago Chamber of Commerce (“The Chamber”) serves the South Chicago Community, representing the many local businesses of the region.
2. The Chamber works to promote economic redevelopment, community empowerment and revitalization of the local business climate.
3. The Chamber understands that Chicago Clean Energy, LLC (“CCE”) is seeking to build a clean coal SNG facility, as defined in Public Act 97-0096, at a brownfield site located in Cook County, specifically on the south side of Chicago, that will convert Illinois coal to substitute natural gas (“SNG”).
4. Production of SNG at CCE’s proposed clean coal SNG facility will result in the employment of over 2,500 Illinois workers, including over 1,100 full-time construction workers, 625 construction-related supporting business jobs, 200 permanent, high-paying operations jobs, 425 operations-related supporting business jobs, and 165 coal extraction jobs. Many of those local employees will patronize the local businesses who are Chamber members. In addition, the facility will generate contracting opportunities for Chamber members.

5. The current proceeding involves the approval of “sourcing agreements” pursuant to Section 9-220 of the Public Utilities Act, enabling CCE to begin building and operating the clean coal SNG facility. (220 ILCS 5/9-220(h-1), *et seq.*)

6. The Chamber, on behalf of its current members and potential future members who would benefit from the clean coal SNG brownfield facility, seeks to protect its membership and future employees’ interests in promoting job creation and job preservation in Illinois and taking advantage of Illinois’ natural resources. The Chamber has a substantial interest in the outcome of this proceeding, and no other party can adequately represent its interests.

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

8. The Chamber agrees to electronic service pursuant to Section 200.1050 of the Commission’s Rules of Practice. (83 Adm. Code 200.1050.) Please include on the service list the following party:

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

Dated: December 28, 2011

Respectfully submitted,
The Chamber



Raya Lopez
Executive Director



By: One of its Attorneys

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