# BEFORE THE ILLINOIS COMMERCE COMMISSION
# STATE OF ILLINOIS

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| COMMONWEALTH EDISON COMPANY | ) | |
| | ) | No. 12-0298 |
| Petition for Statutory Approval of a Smart Grid | ) | |
| Advanced Metering Infrastructure Deployment | ) | SERVED ELECTRONICALLY |
| Plan pursuant to Section 16-108.6 of the | ) | |
| Public Utilities Act | ) | |

## VERIFIED PETITION TO INTERVENE OF AARP AND REQUEST TO APPEAR PRO HAC VICE

**AARP**, by and through counsel, pursuant to the Illinois Commerce Commission Rules of Practice, 83 Ill. Adm. Code, Section 200.200, hereby petitions for intervention as a party in the above captioned case initiated by Commonwealth Edison Company ("Company" or "ComEd").

In support of this application, AARP states as follows:

1. AARP is a nonprofit, nonpartisan organization that advocates for people who are 50 years of age and older, seeking to promote their independence, choice and control in ways that are beneficial and affordable to them and to society as a whole.[1]

2. AARP promotes the well-being of older persons through advocacy, education, and service on a number of priority issues. AARP has determined that advocacy for reasonable utility rates and service for seniors is one of these priority issues. AARP's interest in this matter relates to how this case may impact those older

[1] In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to become members. AARP is a non-profit corporation that has been granted tax exempt status under Section 501(c)(4) of the Internal Revenue Code as a social welfare organization.

Illinois customers who are currently receiving electric service from ComEd. Older customers are particularly vulnerable to increases in energy prices. They also devote a higher percentage of their total spending than do other age groups on residential energy costs. Older customers also have special needs with regard to access to electric service.

3. AARP is currently an intervenor in ComEd's Formula Rate Case (Docket No. 11-0721).

4. AARP agrees to accept the current procedural status of this case, and 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.

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5. In addition, pursuant to Illinois Supreme Court Rule 707 and Illinois Commerce Commission Rules of Practice, 83 Ill. Adm. Code, Section 200.90(a), the undersigned counsel requests permission to appear in the above-captioned administrative proceeding on a *pro hac vice* basis.

6. The undersigned counsel has 20 years of experience practicing before public utility commissions, including several previous cases before the Illinois Commerce Commission. The undersigned counsel is a member in good standing of the Missouri Bar and is not disqualified from appearing in any court.

7. The state of Missouri permits visiting attorneys to practice before its public utility commission in a *pro hac vice* capacity in similar situations. Missouri Public Service Commission Rule 4 CSR 240-2.040(3)(C).

8. Correspondence, communications, orders and the decision in this matter should be addressed to:

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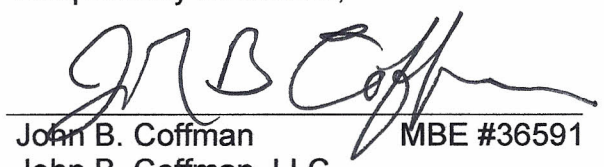
WHEREFORE, AARP respectfully requests that the Commission grant its Verified Petition to Intervene, entitling it to fully participate in this proceeding, and permitting its undersigned counsel to appear *pro hac vice* in this proceeding.

Respectfully submitted,



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Attorney for AARP

Dated: 27th day of April 2012.