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**ILLINOIS COMMERCE COMMISSION**

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Commonwealth Edison Company

Application for a Certificate of Public Convenience and Necessity, pursuant To Section 8-406 of the Illinois Public Utilities Act, and an Order Pursuant to Section 8-503 of Illinois Public Utilities Act, to Construct, Operate and Maintain a new 345 kilovolt Transmission line in Ogle, DeKalb, Kane and DuPage Counties, Illinois

Docket No. 13-0657

PETITION FOR LEAVE TO INTERVENE

NOW COMES Utility Risk Management Corporation (“URMC”) and pursuant to Section 200.200 of the Illinois Administrative Code and the Rules of Practice of the Illinois Commerce commission (“Commission”) petitions the Commission for leave to intervene and participate in the above captioned proceeding and in support thereof, states as follows:

1. On December 2, 2013, Commonwealth Edison Company (“ComEd”) filed the above captioned proceeding seeking a Certificate of Necessity to construct, operate, and maintain electrical transmission lines and a Commission order authorizing construction of those lines.
2. Commission approval of ComEd’s petition will authorize construction (utilizing ratepayer funds and property) of a new 345 kilovolt transmission line from the Byron to Wayne substations in Olge, DeKalb, Kane and DuPage Counties of Illinois.
3. Consequently, Commission review of the above captioned matter directly impacts the Byron to Cherry Valley transmission link within ComEd’s Transmission Service Territory.

4. URMC is a Merchant Transmission Developer incorporated in Delaware with a principle place of business in Pennsylvania.
5. URMC currently holds a PJM Interconnection, LLC (“PJM”) right to invest in the upgrade of the Byron to Cherry Valley transmission link within the ComEd Transmission Service Territory.
6. URMC holds a firm commitment to upgrade the transmission link from Byron to Cherry Valley as a Merchant Transmission Developer (i.e. without utilizing ratepayer funds and property). This commitment has been accepted and approved by PJM.
7. Given URMC’s firm commitment regarding upgrade of the Byron to Cherry Valley transmission link within the ComEd Transmission Service Territory, URMC will be impacted by the proposed electric transmission lines, is interested in the subject matter of the above captioned matter, and its interests will be affected by any decision of the Illinois Commerce Commission in the above entitled docket.
8. URMC shall accept electronic service as provided by Section 200.1050 of the Illinois Administrative Code and the Commission’s Rules of Practice and copies of all documents docketed in this matter should be sent to:

Adam Rousselle, CEO  
Utility Risk Management Corporation  
104 Autumn Trace Drive  
New Hope, PA 18983  
(267)254-6107  
[arousselle@utilityrisk.com](mailto:arousselle@utilityrisk.com)

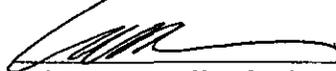
9. URMC is prepared to and does accept the record and the procedural schedule as established to date in this docket.

WHEREFORE, Petitioner URMC respectfully requests that it be granted leave to intervene and become party to this proceeding.

DATED this ~~13~~ day of March, 2014

17<sup>th</sup> *all*

Respectfully Submitted,



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Adam Rousselle, CEO  
Utility Risk Management  
104 Autumn Trace Drive  
New Hope, PA 18983

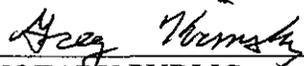
*Pennsylvania* <sup>GK</sup>  
STATE OF ~~ILLINOIS~~  
COUNTY OF Bucks

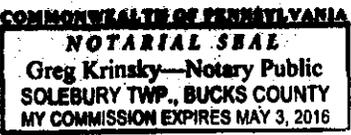
VERIFICATION

Adam Rousselle, being first duly sworn, deposes and says that he is the Chief Executive Officer of Utility Risk Management Corporation, and he is duly authorized to execute this Petition for Leave to Intervene; that he has read the above and foregoing document, has knowledge of the facts stated therein and herewith states that the matters set forth therein are true in substance and in fact.

  
Adam Rousselle, CEO  
Utility Risk Management Corporation  
104 Autumn Trace Drive  
New Hope, PA 18983

SUBSCRIBED AND SWORN TO before me, a Notary Public, on this ~~15<sup>th</sup>~~ <sup>GK</sup> 17<sup>th</sup> day of March, 2014.

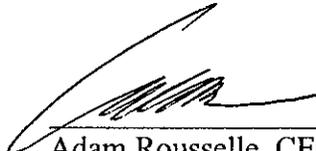
  
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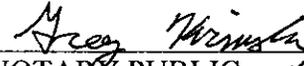
~~Pennsylvania~~ PA  
STATE OF ~~ILLINOIS~~  
COUNTY OF Bucks

PROOF OF SERVICE

I, Adam Rousselle, hereby certify that I did on this \_\_\_ day of March, 2014, electronically file with the Illinois Commerce Commission, a Petition for Leave to Intervene on behalf of said company, and electronically served same upon the persons identified on the Commission's official service list.

  
\_\_\_\_\_  
Adam Rousselle, CEO  
Utility Risk Management Corporation  
104 Autumn Trace Drive  
New Hope, PA 18983

SUBSCRIBED AND SWORN TO before me, a Notary Public, on this ~~7<sup>th</sup>~~ 17<sup>th</sup> day of March, 2014. PA

  
\_\_\_\_\_  
NOTARY PUBLIC

