

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	)	
On Its Own Motion	)	
v.	)	
Commonwealth Edison Company	)	Docket No. 14-0385
	)	
Investigation of Commonwealth Edison	)	
Company's supply rate subsidies for	)	
non-residential space heat customers and	)	
lighting customers.	)	

**VERIFIED PETITION TO INTERVENE ON BEHALF OF  
THE ILLINOIS COMPETITIVE ENERGY ASSOCIATION**

The Illinois Competitive Energy Association, pursuant to Section 200.200 of the Illinois Commerce Commission's ("Commission") Rules of Practice (83 Ill. Admin. Code § 200.200), respectfully submits this Verified Petition to Intervene in the above-captioned Docket. In support of its Petition, ICEA states as follows:

1. ICEA is a not-for-profit corporation established as an Illinois-based trade association to represent the interests of competitive energy suppliers and others interested in preserving and enhancing opportunities for customer choice and competitive in the electric and natural gas industries in Illinois. ICEA's membership includes some of the most active competitive energy suppliers in Illinois, including Homefield Energy, Inc.; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; FirstEnergy Solutions Corp.; Integrys Energy Services, Inc.; MC Squared Energy Services, LLC; Nordic Energy Services, Inc.; NextEra Energy Services; and Verde Energy. These suppliers serve residential, commercial, industrial, and public sector customers. The members' customers include the manufacturing industry; retail businesses; local units of government; cultural, sporting, and educational institutions; hospitals;

hotels; and restaurants. In addition, several of the member companies serve municipal aggregation programs.

2. Within the service territory of the Commonwealth Edison Company (“ComEd”), ICEA members compete against ComEd’s default rate, including space heating rates. Subsidies in non-residential space heating rates would put ICEA members at a competitive disadvantage in acquiring the customer individually or through municipal aggregation.

3. Please add the undersigned counsel and the following individuals to the service list on behalf of ICEA:

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<p>David Fein          10 South Dearborn Street, 50th Floor          Chicago, IL 60603  <a href="mailto:David.Fein@exeloncorp.com">David.Fein@exeloncorp.com</a></p>	<p>Melissa Lauderdale          627 Snow Goose Lane          Annapolis, MD 21409  <a href="mailto:MLLauderdale@integrysenergy.com">MLLauderdale@integrysenergy.com</a></p>
<p>John Slocum          20 North Wacker Drive, Suite 2100          Chicago, IL 60606  <a href="mailto:JPSlocum@integrysenergy.com">JPSlocum@integrysenergy.com</a></p>	<p>Sharon Hillman          2 N. Riverside Plaza, Suite 1350          Chicago, IL 60606  <a href="mailto:SharonHillman@mc2energyservices.com">SharonHillman@mc2energyservices.com</a></p>
<p>John Kern          2 North Riverside Plaza, Suite 1350          Chicago, IL 60606  <a href="mailto:JKern@mc2energyservices.com">JKern@mc2energyservices.com</a></p>	<p>Teresa Ringenbach          21 E. State Street, Suite 1901          Columbus, OH 43215  <a href="mailto:Teresa.Ringenbach@directenergy.com">Teresa.Ringenbach@directenergy.com</a></p>
<p>Joseph Clark, Esq.          21 East State Street, 19th Floor          Columbus, OH 43215  <a href="mailto:Joseph.Clark@directenergy.com">Joseph.Clark@directenergy.com</a></p>	<p>Jennifer Lause          21 E. State Street          Columbus, OH 43215  <a href="mailto:Jennifer.Lause@directenergy.com">Jennifer.Lause@directenergy.com</a></p>

<p>Angela Schorr  574 Derby Drive South  Oceanside, NY 11572  <a href="mailto:Angela.Schorr@directenergy.com">Angela.Schorr@directenergy.com</a></p>	<p>Lou D'Alessandris  341 White Pond Drive  Mail Stop A-WAC-B2  Akron, Ohio 44320  <a href="mailto:ldalessandris@firstenergycorp.com">ldalessandris@firstenergycorp.com</a></p>
<p>Laura DiNicola  341 White Pond Drive  Mail Stop A-WAC-B2  Akron, OH 44320  <a href="mailto:ldinicola@firstenergycorp.com">ldinicola@firstenergycorp.com</a></p>	<p>Jacob McDermott  76 South Main Street  Akron, OH 44308  <a href="mailto:jmcdermott@firstenergycorp.com">jmcdermott@firstenergycorp.com</a></p>
<p>Sharon Noewer  341 White Pond Drive  Mail Stop A-WAC-B2  Akron, OH 44320  <a href="mailto:slnoewer@firstenergysolutions.com">slnoewer@firstenergysolutions.com</a></p>	<p>Charlene Rericha  FirstEnergy Solutions Corp.  341 White Pond Drive  Mail Stop A-WAC-B2  Akron, OH 44320  <a href="mailto:crericha@firstenergycorp.com">crericha@firstenergycorp.com</a></p>
<p>John Gomoll  Box 211  St. Charles, IL 60174  <a href="mailto:John.P.Gomoll@dynegy.com">John.P.Gomoll@dynegy.com</a></p>	<p>Jeff Ferry  2604 Parsley Lane  Springfield, IL 62711  <a href="mailto:Jeff.Ferry@dynegy.com">Jeff.Ferry@dynegy.com</a></p>
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<p>Wayne Bollinger  One Tower Lane , Suite 300  Oakbrook Terrace, IL 60181  <a href="mailto:wbollinger@nordicenergy-us.com">wbollinger@nordicenergy-us.com</a></p>	<p>Ann Marie Toss  101 Merritt 7, Second Floor  Norwalk, CT 06851  <a href="mailto:atoss@verdeenergyusa.com">atoss@verdeenergyusa.com</a></p>
<p>Natallia Kralia  101 Merritt 7, Third Floor  Norwalk, CT 06851  <a href="mailto:nkralia@verdeenergyusa.com">nkralia@verdeenergyusa.com</a></p>	<p>Kevin Wright, President  601 West Monroe Street  Springfield, IL 62704  <a href="mailto:wright2192@sbcglobal.net">wright2192@sbcglobal.net</a></p>

Each of these individuals and the undersigned counsel agrees to electronic service pursuant to Section 200.1050 of the Commission's Rules.

WHEREFORE ICEA respectfully requests that the Commission grant its Verified Petition to Intervene, and to grant any further relief as appropriate.

June 26, 2014

Illinois Competitive Energy Association

By: /s/ Michael R. Strong  
One of its Attorneys

Michael R. Strong  
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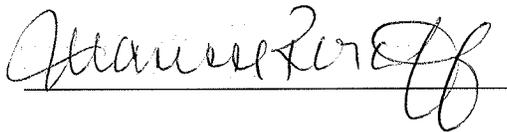
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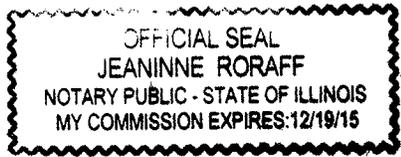
**VERIFICATION**

Michael R. Strong, being first duly sworn, on oath deposes that he is outside counsel for the Illinois Competitive Energy Association, that the above Verified Petition to Intervene on behalf of the Illinois Competitive Energy Association was prepared by him or under his direction, he knows the contents thereof, and that the same is true and correct to the best of his knowledge, information, and belief.

  
\_\_\_\_\_  
Michael R. Strong

Subscribed and sworn to me  
This 20th day of June 2014

  
\_\_\_\_\_



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**NOTICE OF FILING**

Please take notice that on June 26, 2014, the undersigned, an attorney, cause the Verified Petition to Intervene on Behalf of the Illinois Competitive Energy Association to be filed via eDocket with the Chief Clerk of the Illinois Commerce Commission in the above-captioned proceeding:

June 26, 2014

/s/ Michael R. Strong  
Michael R. Strong

**CERTIFICATE OF SERVICE**

I, Michael R. Strong, an attorney, certify that copies of the foregoing document(s) were served upon the parties on the Illinois Commerce Commission's service list as reflected on eDocket via electronic delivery from One North Wacker, Suite 4400, Chicago, IL 60606 on June 26, 2014.

/s/ Michael R. Strong  
Michael R. Strong