

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

MIDAMERICAN ENERGY COMPANY

An Iowa Corporation

and

JO-CARROLL ENERGY INC.

An Illinois non-profit corporation

:
:
:
:
:
:
:
:
:
:
:
:

Docket No. 15-_____

JOINT PETITION FOR APPROVAL
OF CUSTOMER RELEASE

COME NOW, MidAmerican Energy Company (“MidAmerican”), an Iowa corporation, and Jo-Carroll Energy, Inc. (“Jo-Carroll”), an Illinois non-profit corporation, hereinafter collectively referred to as “Petitioners”, and hereby file this Joint Petition with the Illinois Commerce Commission (“Commission”), pursuant to Sections 2 and 6 of the Electric Supplier Act (“ESA”), 220 ILCS 30/1, et seq., and in support thereof state as follows:

1. Petitioners are both electric suppliers as defined in Section 3.5 of the ESA.
2. Section 2 of the ESA states that “... any 2 or more electric suppliers may contract, subject to the approval of the Illinois Commerce Commission, as to the respective areas in which each supplier is to provide service.” [220 ILCS 30/2].
3. Section 6 of the ESA states that “any 2 or more electric suppliers may contract together defining and delineating, as between themselves, one or more service areas in which each contracting supplier shall be entitled to furnish service. Such contracts are subject to the approval of the Commission.” [220 ILCS 30/6].

4. Attached hereto as Joint Petition Exhibit "A" is a copy of a Request for Customer Release ("Release") dated August 13th, 2015, from Gene A. Griffith, Griffith Management, LLC/Griffith Farms, LLC ("Customer"), a residential customer located within the service area of MidAmerican. The Release requests that MidAmerican consent to and allow Jo-Carroll to provide a new three-phase service to the premises. The Release also requests that the Customer consent to Jo-Carroll providing the new three-phase service and Jo-Carroll has agreed to do so. A copy of the Partial Service Area Agreement between MidAmerican and Jo-Carroll is attached hereto as Joint Petition Exhibit "B".

5. The Customer is currently receiving one-phase service at 16636 N. 1620 Ave., Geneseo, Illinois, from MidAmerican and will continue to do so, such one-phase service being unaffected by this transfer. The proposed premises to be served by three-phase service from Jo-Carroll is more fully described in the legal description attached as Attachment 1 to Joint Petition Exhibit "A" and shown in Appendix A of the attached Joint Petition Exhibit "B". The Customer requests new three-phase electric service to the premises to serve new grain bins and equipment to be installed at the premises.

6. As provided by Sections 2 and 6 of the ESA, MidAmerican and Jo-Carroll have also agreed to a Partial Service Area Agreement, attached as Joint Exhibit B, with regard to the release described in Section 4 herein and in Joint Exhibit A.

7. The Customer and Jo-Carroll have requested that MidAmerican release the Customer for the limited purpose of providing the new three-phase service, and MidAmerican has no objection to the request.

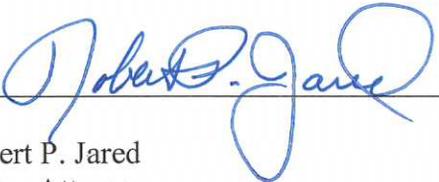
8. Petitioners assert that authorizing this limited transfer of service will further the goals of the Electric Supplier Act, increase the efficiency of Petitioners in rendering service to the public, avoid duplication of facilities, and is in the public interest.

WHEREFORE, MidAmerican Energy Company and Jo-Carroll Energy, Inc. request the Illinois Commerce Commission authorize and approve the release of and transfer of the Customer for the limited purpose of providing the new three-phase service as proposed.

Dated: August 13, 2015

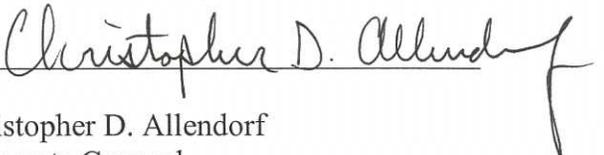
Respectfully submitted,

MIDAMERICAN ENERGY COMPANY

By: 

Robert P. Jared
Senior Attorney
MidAmerican Energy Company
106 East Second Street
P.O. Box 4350
Davenport, Iowa 52808
rpjared@midamerican.com

JO-CARROLL ENERGY, INC.

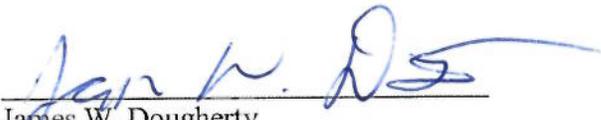
By: 

Christopher D. Allendorf
Corporate Counsel
Jo-Carroll Energy, Inc.
793 U.S. Route 20 West
P.O. Box 390
Elizabeth, Illinois 61028
callendorf@jocarroll.com

VERIFICATION

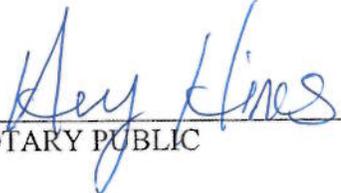
STATE OF IOWA)
)
) ss
COUNTY OF POLK)

I, James W. Dougherty, Vice President, Electric Delivery for MidAmerican Energy Company, state that I have read the foregoing Joint Petition for Approval of Customer Release filed in the above cause and know the context thereof and the same is true and correct to the best of my knowledge, information and belief.



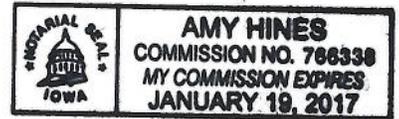
James W. Dougherty

Subscribed and sworn to be before me this 17th day of August, 2015



NOTARY PUBLIC

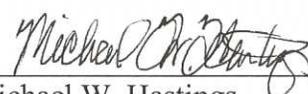
My Commission expires January 19, 2017.



VERIFICATION

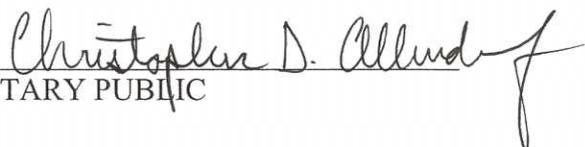
STATE OF ILLINOIS)
)
COUNTY OF Jo Daviess) ss

I, Michael W. Hastings, President and Chief Executive Officer of Jo-Carroll Energy, Inc., state that I have read the foregoing Joint Petition for Approval of Customer Release filed in the above cause and know the context thereof and the same is true and correct to the best of my knowledge, information and belief.



Michael W. Hastings

Subscribed and sworn to be before me this 13th day of August, 2015



NOTARY PUBLIC

My Commission expires 01/07/18.

