

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

The Illinois Power Agency)	
)	
Petition for Approval of the 2016 IPA)	Docket No. 15-0541
Procurement Plan Pursuant to Section)	
16-11.5(d)(4) of the Public Utilities Act)	

PETITION TO INTERVENE OF THE RENEWABLES SUPPLIERS

Pursuant to 83 Illinois Administrative Code §200.200, the entities listed below, collectively referred to for purposes of this proceeding as the “Renewables Suppliers,” hereby petition the Commission to intervene in the above-captioned proceeding:

- Invenergy LLC and its affiliated project companies Grand Ridge Energy IV LLC and Invenergy Illinois Solar I LLC; and
- NextEra Energy Resources, LLC and its subsidiary project company FPL Energy Illinois Wind, LLC.

In support of their request to intervene in this proceeding, the Renewables Suppliers state:

1. Each of the Renewables Suppliers has actively participated in the development and deployment of renewable energy resources in Illinois and in other states. Each of the above-listed project companies of the Renewables Suppliers holds a long term power purchase agreement (“LTPPA”) with Commonwealth Edison Company for the supply of renewable energy resources. These LTPPAs were entered into as the result of procurement events that were conducted pursuant to the Illinois Power Agency’s (“IPA”) procurement plan that was approved by the Commission in Docket 09-0373. The Renewables Suppliers have also actively participated in previous IPA procurement plan proceedings, including Docket 13-0546 relating to the IPA’s 2014 Procurement Plan and Docket 14-0588 relating to the IPA’s 2015 Procurement Plan.

2. On or about August 14, 2015, the IPA issued its 2016 Draft Procurement Plan (“Draft Plan”). On September 14, 2015, the Renewables Suppliers submitted Comments to the IPA regarding the Draft Plan.

3. On September 28, 2015, the IPA filed its 2016 Procurement Plan (“Proposed Plan”) with the Commission, thus initiating this proceeding. The Proposed Plan includes components and recommended actions that will, if adopted, impact the financial and commercial interests of the Renewables Suppliers. In addition, the Renewables Suppliers may wish to propose additional components or actions for inclusion in the Proposed Plan.

4. In the interests of administrative efficiency, convenience and cost-effectiveness, the Renewables Suppliers wish to actively participate in this proceeding on a joint basis. However, each of the Renewables Suppliers reserves the right to present its individual position during the course of this proceeding as needed.

5. No other party can adequately represent the interests of the Renewables Suppliers.

6. Granting this Petition to Intervene will not delay this proceeding. The Renewables Suppliers agree to accept service by electronic means as provided for by the Commission’s Rules of Practice (*see* 83 Ill. Admin. Code §200.1050). Please include on the official Service List the following representatives of the Renewables Suppliers:

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7. WHEREFORE, the Renewables Suppliers respectfully request that the Commission grant this Petition to Intervene, permit the Renewables Suppliers to participate as parties in this proceeding, and grant such further or additional relief as it deems appropriate.

Respectfully submitted,



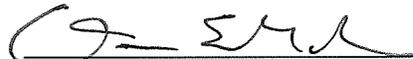
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Attorney for the Renewables Suppliers

STATE OF ILLINOIS)
)
COUNTY OF COOK) SS.

VERIFICATION

Owen E. MacBride, on oath, states that he is the attorney for the Renewables Suppliers listed in the foregoing Petition to Intervene, that he is authorized to make this verification on behalf of the Renewables Suppliers, that he has read the foregoing Petition to Intervene and is familiar with the matters set forth therein, and that the matters set forth in the Petition to Intervene are true and correct to the best of his knowledge, information and belief.

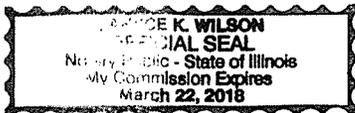


Owen E. MacBride

Subscribed and sworn to before me
this 30th day of September, 2015.



Notary Public



CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he caused the Renewables Suppliers' Petition to Intervene in Docket 15-0541 to be served on each of the persons on the Service List by e-mail on September 30, 2015.

/s/ Owen E. MacBride

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