

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Power Agency)	
)	
)	
Petition for Approval of the 2016 IPA Procurement Plan Pursuant to Section 16-111.5(d)(4) of the Public Utilities Act)	Docket 15-0541
)	
)	

**VERIFIED PETITION TO INTERVENE OF
MIDAMERICAN ENERGY COMPANY**

NOW COMES, MidAmerican Energy Company (MidAmerican) by its undersigned attorney, pursuant to 83 Ill. Admin. Code § 200.200, and hereby respectfully petitions the Illinois Commerce Commission (Commission) for leave to intervene and participate in this docket. In support of this Petition, MidAmerican states as follows:

1. On September 28, 2015, the Illinois Power Agency (Agency) filed its Petition for Approval of the Procurement Plan (Petition) pursuant to Section 16-111.5(d) of the Illinois Public Utilities Act (Act). 220 ILCS 5/16-111.5(d). The IPA attached to its Petition MidAmerican’s Draft Power Procurement Plan for the period beginning June 2016 through May 2021 (Procurement Plan) in Attachment D. The IPA has submitted to the Commission its proposed plan for the procurement of electricity for a portion of MidAmerican’s Illinois jurisdictional load.

2. MidAmerican has an interest in the subject matter of this docket, and cannot be adequately represented by any other party in this case. As noted in the IPA’s petition, MidAmerican has elected to participate in the IPA’s planning and procurement process as a small multijurisdictional electric utility to procure a portion of its eligible retail customer load requirement for the first time. Since the Procurement Plan includes a portion of MidAmerican’s jurisdictional Illinois load, MidAmerican should be permitted to participate as a party in this case.

3. The granting of MidAmerican's Petition to Intervene will not delay this proceeding.

4. MidAmerican requests the following people be placed on the official Service List in this proceeding:

Jennifer S. Moore
Senior Attorney
MidAmerican Energy Company
106 East Second Street
P. O. Box 4350
Davenport, Iowa 52808
jsmoore@midamerican.com

Theresa Thompson
Paralegal
MidAmerican Energy Company
106 East Second Street
P.O. Box 4350
Davenport, Iowa 52808
tthompson@midamerican.com

MidAmerican agrees to accept service by electronic means as provided for in Section 200.1050 of the Commission's Rules of Practice. 83 Ill. Admin. Code § 200.1050.

WHEREFORE, MidAmerican Energy Company respectfully requests leave to intervene and to participate as a party in this proceeding.

Dated: September 30, 2015

Respectfully submitted,

MIDAMERICAN ENERGY COMPANY

By /s/ Jennifer S. Moore
Jennifer S. Moore
Senior Attorney
MidAmerican Energy Company
106 East Second Street
P. O. Box 4350
Davenport, Iowa 52808
Telephone: 563/333-8006
Facsimile: 563/333-8021
jsmoore@midamerican.com

STATE OF IOWA)
)
SCOTT COUNTY) ss.

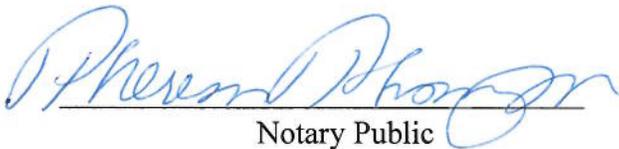
VERIFICATION

Jennifer S. Moore, being first duly sworn, deposes and says that she is an attorney for MidAmerican Energy Company; that she has read the foregoing Petition of MidAmerican Energy Company for Leave to Intervene and knows the contents thereof; and that the statements therein contained are true to the best of her knowledge, information and belief.



Jennifer S. Moore

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



Notary Public

