

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

ILLINOIS POWER AGENCY :
: Docket No. 15-0541
Petition for Approval of the 2016 IPA :
Procurement Plan Pursuant to Section :
16-111.5(d)(4) of the Public Utilities Act :

**VERIFIED PETITION TO INTERVENE OF
COMMONWEALTH EDISON COMPANY**

Commonwealth Edison Company (“ComEd”), by its undersigned attorneys and pursuant to 83 Ill. Admin. Code § 200.200, hereby respectfully petitions the Illinois Commerce Commission (“Commission”) for leave to intervene and participate as a party in this docket. In support of its Verified Petition to Intervene, ComEd states as follows:

1. ComEd is a corporation organized and existing under and by virtue of the laws of the State of Illinois, with its corporate offices at 440 S. LaSalle Street, Suite 3300, Chicago, Illinois 60605. ComEd is a “public utility” as that term is defined in Section 3-105 of the Public Utilities Act (“the Act”), 220 ILCS 5/3-105, and an “electric utility” as that term is defined in Section 16-102 of the Act, 220 ILCS 5/16-102.

2. This docket was initiated by the Illinois Power Agency (“IPA”) filing of its Verified Petition for Approval of the 2016 Procurement Plan Pursuant to 220 ILCS 5/16-111.5(d)(4) (“Petition”). Attached to the Petition is the IPA’s 2016 Power Procurement Plan for the 2016-2021 delivery years (“Procurement Plan”). The IPA has submitted to the Commission its proposed plan for, among other things, the procurement of electricity for certain customers of Ameren Illinois Company and ComEd.

3. ComEd has an interest in the subject matter of this docket, and cannot be adequately represented by any other party in this case. The IPA’s Procurement Plan sets forth a

procurement approach that will secure electricity commodity and associated transmission services, plus required renewable energy assets, to meet the supply needs of eligible retail customers served by ComEd. ComEd, which serves at least 100,000 customers in Illinois, is required to procure power and energy for eligible retail customers¹ according to the applicable provisions of Section 1-75 of the Illinois Power Agency Act (“IPA Act”), 20 ILCS 3855/1-75, and Section 16-111.5 of the Act, 220 ILCS 5/16-111.5. Because ComEd is required to purchase power and energy to serve its customers pursuant to the IPA’s Procurement Plan, ComEd should be permitted to participate as a party in this proceeding.

4. Copies of all pleadings, notices, and correspondence in this docket should be sent to the undersigned counsel for ComEd at the following addresses:

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5. ComEd agrees to accept the status of the record as the same exists at the time of its intervention and to accept service by electronic means as provided for in Section 200.1050 of the Commission’s Rules of Practice, 83 Ill. Adm. Code 200.1050.

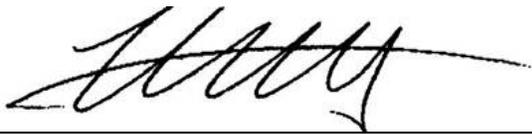
¹ “Eligible Retail Customers” means those retail customers that purchase power and energy from an electric utility (like ComEd) under fixed price bundled service tariffs, other than those retail customers whose service is declared or deemed competitive and certain other specified groups in Section 16-111.5 of the Act.

WHEREFORE, Commonwealth Edison Company prays that this Petition to Intervene be granted and that it hereafter be treated as a party to this proceeding.

Dated this 30th day of September, 2015.

Respectfully submitted,

COMMONWEALTH EDISON COMPANY

By: 

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VERIFICATION

I, Mark R. Johnson, being first duly sworn, hereby state that (i) I am an attorney for Commonwealth Edison Company and am authorized to make this Verification on its behalf; (ii) I have knowledge of the facts stated in the foregoing Petition to Intervene of Commonwealth Edison Company; and (iii) the facts as stated therein are true and correct to the best of my knowledge, information and belief.



Mark R. Johnson

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



Notary Public

