

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
THE RETAIL ENERGY SUPPLY ASSOCIATION**

The Retail Energy Supply Association (“RESA”), by and through its attorney, Gerard T. Fox, pursuant to 83 Illinois Admin. Code Section 200.200, hereby petitions the Illinois Commerce Commission (“Commission”) to intervene in the above-captioned proceeding, the petition of the Illinois Power Agency (“IPA”) for Commission approval of the IPA’s 2016 Procurement Plan. In support of this petition, RESA states as follows.

1. RESA is a non-profit trade association of independent corporations that are involved in the competitive supply of electricity and natural gas.¹ RESA and its members are actively involved in the development of retail and wholesale competition in electricity and natural gas markets throughout the United States.

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

2. On September 28, 2015, the IPA filed its petition seeking the Commission's approval of its 2016 energy procurement plan, covering the years 2016-2021.
3. Many of RESA's members are Retail Electric Suppliers ("RESs") in Illinois and, thus, are affected by the IPA's procurement plan filed in this proceeding. RESA has been an active participant in all of the Commission's proceedings for approval of the IPA's previous annual procurement plans.
4. All correspondence to RESA should be addressed to and the following should be added to the service list in this proceeding:

Gerard T. Fox
203 N. LaSalle Street
Suite 2100
Chicago, IL 60601
(312) 909-5583
gerardtfox@gerardtfoxlawoffices.com
5. The granting of the instant Petition to Intervene will not delay this proceeding. RESA agrees to accept the status of the record as it exists as of the date of the instant petition and to be bound by rulings and orders in the instant proceeding as of the date of the instant petition.
6. RESA 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, for the foregoing reasons, the Retail Energy Supply Association requests that its Petition to Intervene be granted and that it be accorded full party status in this proceeding.

Dated: October 1, 2015

Respectfully submitted,

Retail Energy Supply Association

By: /s/GERARD T. FOX
Gerard T. Fox

Law Offices of Gerard T. Fox
203 N. LaSalle Street
Suite 2100
Chicago, IL 60601
(312) 909-5583
gerardtfox@gerardtfoxlawoffices.com

NOTICE OF FILING

Please take note that on October 1, 2015, I caused to be filed via e-docket with the Chief Clerk of the Illinois Commerce Commission, the attached Verified Petition to Intervene of the Retail Energy Supply Association in this proceeding.

/s/GERARD T. FOX
Gerard T. Fox

CERTIFICATE OF SERVICE

I, Gerard T. Fox, certify that I caused to be served copies of the foregoing Verified Petition to Intervene of the Retail Energy Supply Association upon the parties on the service list maintained on the Illinois Commerce Commission's eDocket system for the instant docket via electronic delivery on October 1, 2015.

/s/ GERARD T. FOX
Gerard T. Fox

STATE OF ILLINOIS)
) SS
COUNTY OF WILL)

VERIFICATION

Gerard T. Fox, being first duly sworn, on oath deposes and says that he is an attorney for the Retail Energy Supply Association, that he has read the foregoing Verified Petition to Intervene, that he knows of the contents thereof, and that the same is true to the best of his knowledge, information, and belief.



/s/Gerard T. Fox
Gerard T. Fox

Subscribed and sworn to me
This 1st day of October, 2015

