

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

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

**PETITION TO INTERVENE**  
**OF THE ENVIRONMENTAL LAW & POLICY CENTER**

Pursuant to 83 Ill. Admin. Code 200.200 the Environmental Law & Policy Center (“ELPC”), through its counsel, petitions the Illinois Commerce Commission for leave to intervene in the above-captioned matter. In support of its petition, ELPC states the following:

1. On September 28, 2015, the Illinois Power Agency ("IPA") filed, with the Commission, a Petition for Approval of the 2016 IPA Procurement Plan pursuant to Section 16-111.5(d)(4) of the Public Utilities Act. Accompanying its Petition is a copy of the IPA’s proposed 2015 Power Procurement Plan dated September 28, 2015 (“2016 Procurement Plan”) that covers the procurement of electricity and renewable energy credits for certain customers of Ameren Illinois Company (“Ameren”) and Commonwealth Edison Company ("ComEd") for the period June 2016 through May 2021.
2. ELPC is a not-for-profit organization that works to promote environmentally-sound energy policies in Illinois and throughout the Midwest. ELPC and its members in Illinois have a particular interest in the development and design of the IPA’s Power Procurement Plan and especially the Agency’s Plan for complying with the Illinois Renewable Portfolio Standard. ELPC and its members will be directly and materially affected by the outcome of this proceeding.

3. ELPC agrees to accept service by electronic means per Section 200.1050.

WHEREFORE, for the above stated reasons, ELPC requests that leave to intervene be granted by the Commission and it be made a party to this proceeding, and requests that all orders, notices, correspondence, pleadings, testimony and other documents be served upon the undersigned.

Dated: October 5, 2015

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Brad Klein", is written above a horizontal line.

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