

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

THE ILLINOIS POWER AGENCY)
)
Petition for Approval of)
The 2016 IPA Procurement)
Pursuant to Section 5/16-111.5(d)(4))
of the Public Utilities Act)

Docket No. 15-0541

PETITION FOR LEAVE TO INTERVENE OF ENERGY RESOURCES CENTER

The Energy Resources Center at the University of Illinois at Chicago (“ERC”), pursuant to 83 Ill. Admin. Code, § 200.200, 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, ERC states as follows:

1. ERC is an interdisciplinary public service, research, and special projects organization located in the College of Engineering at the University of Illinois at Chicago. The ERC provides expertise in the areas of energy efficiency, distributed generation, utilities billing management, and biofuels and bioenergy.
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”).
3. ERC has an interest in the subject matter of this docket and cannot adequately be represented by any other party in this case. ERC submitted two proposals in response to ComEd’s Third Party Efficiency Programs Request for Proposals: 1) “Low Income Kit Energy (LIKE) Program” and 2) “Low-Income Multifamily Energy Retrofit Program”. The IPA has included these proposed programs in its proposed 2016 Procurement Plan.
4. ERC became aware this week that ComEd in its Objections to IPA’s 2016 Procurement Plan stated that it considered four programs to be a “performance risk”. Although ComEd does not mention the

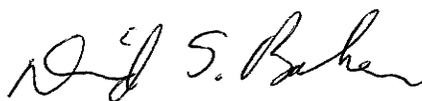
programs by name, the programs may include the two proposed ERC programs. In addition, the Commission staff in its Objections to the IPA 2016 Procurement Plan recommends that the Commission reject the four programs referred to as “performance risk” by ComEd. ERC believes it has important information for the Commission to consider in its deliberations on the IPA’s Petition that it would like to file as a Response to ComEd’s Objections, if granted leave to intervene and leave to file a Response beyond the October 20th deadline.

5. ERC 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.
6. Copies of all pleadings, notices, and correspondence in this docket should be sent to the undersigned at the following address:

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WHEREFORE, the Energy Resources Center respectfully requests that the Commission grant this Petition for Leave to Intervene.

Respectfully submitted,



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