

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

MidAmerican Energy Services, LLC :  
 :  
Application for Certificate of : Docket No. 15-0440  
Service Authority under Section :  
16-115 of the Public Utilities Act. :

MIDAMERICAN ENERGY SERVICES, LLC'S VERIFIED EMERGENCY MOTION TO  
EXTEND CONTINGENCY

**NOW COMES** MidAmerican Energy Services, LLC ("MES"), and hereby respectfully requests the requests the Illinois Commerce Commission ("Commission") grant leave to file its Emergency Motion to Extend Contingency pursuant to Section 200.190 of the Rules of Practice ("Rules") of the Commission (83 Ill. Adm. Code § 200.190). In support of this Motion, MES states the following:

1. On July 28, 2015, MES filed a verified application requesting a certificate of service authority as an Alternative Retail Electric Supplier ("ARES") in Illinois, pursuant to Section 16-115 of the Public Utilities Act, (220 ILCS 5/16-115) (the "Act"), and 83 Ill. Adm. Code 451. MES requested authority to offer ARES service to all retail customer groups in the service territories of Commonwealth Edison Company ("ComEd") and Ameren Illinois Company ("Ameren"). (451.30(c)(1)(2)).

2. In its application, MES outlined how it met the financial criteria set forth in Section 451.320(a)(3). MES certified that it is a member of PJM, but requested approval to provide proof of membership, as demonstrated by market participant status in Midcontinent Independent System Operator ("MISO") within 90 days of a Commission Order approving the conditional certificate of authority, contingent upon receipt of proof of market participant status.

MES stated it anticipated gaining MISO market participant status in October of 2015. MES explained it understood that it currently meets the financial qualifications under Section 451.320(a)(3) only for ComEd's service territory, and that it cannot offer service as an ARES in the territory of Ameren Illinois Company until it demonstrates that it is a member of MISO. To receive a conditional ARES certificate, MES submitted an affidavit from its President stating that: (a) Applicant will not serve customers in the MISO delivery area until it becomes a member of MISO, (b) Applicant intends to provide ARES services in the MISO delivery area at a later time, (c) Applicant agrees to submit proof of its MISO market participant status in a filing in this docket with the Chief Clerk and those on the service list no less than 15 days before delivering power in the service territory of Ameren Illinois Company, and (d) Applicant agrees to meet any additional notification requirement that the Commission may determine in this proceeding.

3. The Commission granted MES a Certificate to operate as an ARES on August 18, 2015. MES was granted authority to sell electricity and power as well as single billing services to all eligible customers in the service areas of ComEd and Ameren, contingent upon receiving proof of market participant status in MISO within ninety (90) days of the Commission Order.

4. MES has been engaged in ongoing correspondence with MISO and has received assurances that MES has completed all requirements, but to date MES has not received the final documentation required by the Commission. MISO has not issued, nor has MISO indicated it will issue, the final proof of market participant status before the Commission's ninety (90) day contingency period, which ends on November 16, 2015. MES expects to receive proof of market participant status on or prior to December 1, 2015.



VERIFICATION

STATE OF Iowa )  
COUNTY OF Polk )

ss:

Jack P. Kelleher, being first duly sworn, deposes and says that he is the President of MidAmerican Energy Services, LLC; that he has read the foregoing Verified Emergency Motion to Extend Contingency of MidAmerican Energy Services, LLC, and referred to within the Motion; and that the statements contained in the Motion are true, correct and complete to the best of his knowledge, information and belief.



Jack P. Kelleher

Subscribed and sworn to before me  
this 13th day of November, 2015.

  
Notary Public

[Stamp of Notary]

