

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Department of Commerce and Economic Opportunity)	
)	
)	Docket No. 16-0422
Approval of its Energy Efficiency Portfolio and Plan Pursuant to Sections 8-103(e) and (f) and 8-104(e) and (f) of the Public Utilities Act.)	
)	

**VERIFIED PETITION TO INTERVENE ON BEHALF OF
THE ILLINOIS COMPETITIVE ENERGY ASSOCIATION**

The Illinois Competitive Energy Association, pursuant to Section 200.200 of the Illinois Commerce Commission’s (“Commission”) Rules of Practice (83 Ill. Admin. Code § 200.200), respectfully submits this Verified Petition to Intervene in the above-captioned Docket. In support of its Petition, ICEA states as follows:

1. ICEA is a not-for-profit corporation established as an Illinois-based trade association to represent the interests of competitive energy suppliers and others interested in preserving and enhancing opportunities for customer choice and competitive in the electric and natural gas industries in Illinois. ICEA’s membership includes some of the most active competitive energy suppliers in Illinois, including Illinois Power Marketing Company d/b/a Homefield Energy and Dynegy Energy Services, LLC; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; MC Squared Energy Services; and Verde Energy. These suppliers serve residential, commercial, industrial, and public sector customers. The members’ customers include the manufacturing industry; retail businesses; local units of government; cultural, sporting, and educational institutions; hospitals; hotels; and restaurants. In addition, several of the member companies serve municipal aggregation programs.

2. ICEA has been actively involved in several recent Commission dockets and informal discussions surrounding access to customer usage data.

3. The members of ICEA have an interest in the framework for accessing customer data with or without consent, including both interval data and non-interval data.

4. Please add the undersigned counsel and the following individuals to the service list on behalf of ICEA:

<p>Scott D. Humbard 4300 Winfield Road, 5th Floor Warrenville, IL 60555 scott.humbard@exeloncorp.com</p>	<p>Cynthia Brady 4300 Winfield Road Warrenville, IL 60555 Cynthia.Brady@constellation.com</p>
<p>David Fein 10 South Dearborn Street, 50th Floor Chicago, IL 60603 David.Fein@exeloncorp.com</p>	<p>Melissa Lauderdale 627 Snow Goose Lane Annapolis, MD 21409 Melissa.Lauderdale@constellation.com</p>
<p>John Slocum 10 South Dearborn Street, 50th Floor Chicago, IL 60606 John.Slocum@constellation.com</p>	<p>Lael E. Campbell 101 Constitution Ave, NW Washington, DC 20004 Lael.Campbell@constellation.com</p>
<p>Teresa Ringenbach 21 E. State Street, Suite 1901 Columbus, OH 43215 Teresa.Ringenbach@directenergy.com</p>	<p>Jeff Ferry 2604 Parsley Lane Springfield, IL 62711 Jeff.Ferry@dynegy.com</p>
<p>Keith Nemzer One Hess Plaza Woodbridge, NJ 07095 Keith.Nemzer@directenergy.com</p>	<p>Ann Marie Toss 101 Merritt 7, Second Floor Norwalk, CT 06851 atoss@verdeenergyusa.com</p>
<p>John Gomoll Box 211 St. Charles, IL 60174 John.P.Gomoll@dynegy.com</p>	<p>Dana Coulter 20455 State Highway 249, Suite 200 Houston, Texas 77070 dana.coulter@gexaenergy.com</p>
<p>Karen White 101 Merritt 7, Second Floor Norwalk, CT 06851 kwhite@verdeenergyusa.com</p>	<p>Ann DeBortoli 175 W. Jackson, Suite 240 Chicago, IL 60604 ADeBortoli@mc2energyservices.com</p>
<p>Chuck Sutton 175 W. Jackson, Suite 240 Chicago, IL 60604 ChuckSutton@mc2energyservices.com</p>	<p>Kevin Wright, President 1601 Clearview Drive Springfield, IL 62704 wright2192@sbcglobal.net</p>
<p>John Kern 175 W. Jackson, Suite 240 Chicago, IL 60604 JKern@mc2energyservices.com</p>	<p>Christopher Sill 1500 Eastport Plaza Dr. Collinsville, IL 62234 Christopher.Sill@Dynegy.com</p>

5. Each of these individuals and the undersigned counsel agrees to electronic service pursuant to Section 200.1050 of the Commission's Rules.

WHEREFORE ICEA respectfully requests that the Commission grant its Verified Petition to Intervene, and to grant any further relief as appropriate.

September 26, 2016

Illinois Competitive Energy Association

By: /s/ Michael R. Strong

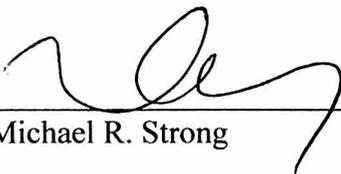
One of its Attorneys

Michael R. Strong
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Chicago, IL 60616
(773) 401-8739
Michael@Strong-Legal.com

STATE OF ILLINOIS)
)
COUNTY OF COOK)

VERIFICATION

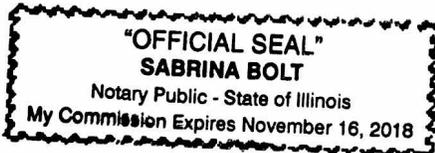
Michael Strong, being first duly sworn, on oath deposes that he is outside counsel for the Illinois Competitive Energy Association, that the above Verified Petition to Intervene on behalf of the Illinois Competitive Energy Association was prepared by him or under his direction, he knows the contents thereof, and that the same is true and correct to the best of his knowledge, information, and belief.



Michael R. Strong

Subscribed and sworn to me
This 26th day of September, 2016





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NOTICE OF FILING

Please take notice that on September 26, 2016, the undersigned, an attorney, cause the Verified Petition to Intervene on Behalf of the Illinois Competitive Energy Association to be filed via eDocket with the Chief Clerk of the Illinois Commerce Commission in the above-captioned proceeding:

September 26, 2016

/s/ Michael R. Strong
Michael R. Strong

CERTIFICATE OF SERVICE

I, Michael R. Strong, an attorney, certify that copies of the foregoing document(s) were served upon the parties on the Illinois Commerce Commission's service list as reflected on eDocket via electronic delivery from 10 W. 35th Street, 16th Floor, Chicago, IL 60616 on September 26, 2016.

/s/ Michael R. Strong
Michael R. Strong