

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

The Illinois Power Agency)	
)	
Petition for Approval of the 2017 IPA)	Docket No. 16-0453
Procurement Plan Pursuant to Section)	
16-111.5(d)(4) of the Public Utilities Act)	

PETITION TO INTERVENE OF THE RENEWABLES SUPPLIERS

Pursuant to 83 Illinois Administrative Code §200.200, the entities listed below, collectively referred to for purposes of this proceeding as the “Renewables Suppliers,” hereby petition the Commission to intervene in the above-captioned proceeding:

- EDP Renewables North America LLC and its subsidiary project companies Blackstone Wind Farm LLC, Meadow Lake Wind Farm I LLC, Meadow Lake Wind Farm II LLC, Meadow Lake Wind Farm III LLC and Meadow Lake Wind Farm IV LLC;
- Invenergy LLC and its affiliated project companies Grand Ridge Energy IV LLC and Invenergy Illinois Solar I LLC; and
- NextEra Energy Resources, LLC and its subsidiary project company FPL Energy Illinois Wind, LLC.

In support of their request to intervene in this proceeding, the Renewables Suppliers state:

1. Each of the Renewables Suppliers has actively participated in the development and deployment of renewable energy resources in Illinois and other states. Each of the Renewables Suppliers’ above-listed project companies holds a long term power purchase agreement (“LTTPA”) with one or both of Commonwealth Edison or Ameren Illinois for the supply of renewable energy resources. These LTTPAs were entered into as the result of procurement events conducted pursuant to the Illinois Power Agency’s (“IPA”) procurement plan that was approved by the Commission in Docket 09-0373. The Renewables Suppliers have actively participated in previous IPA procurement plan proceedings before the Commission.

2. On or about August 15, 2016, the IPA issued its 2017 Draft Procurement Plan (“Draft Plan”) for comment. On September 14, 2016, the Renewables Suppliers submitted Comments to the IPA regarding the Draft Plan.

3. On September 28, 2016, the IPA filed its 2017 Procurement Plan (“Proposed Plan”) with the Commission, thus initiating this proceeding. The Proposed Plan includes components and recommended actions that will, if adopted, impact the financial and commercial interests of the Renewables Suppliers. In addition, the Renewables Suppliers may wish to propose additional components or actions for inclusion in the Proposed Plan.

4. In the interests of administrative efficiency, convenience and cost-effectiveness, the Renewables Suppliers wish to actively participate in this proceeding on a joint basis. However, each of the Renewables Suppliers reserves the right to present its individual position during the course of this proceeding as needed.

5. No other party can adequately represent the interests of the Renewables Suppliers.

6. Granting this Petition to Intervene will not delay this proceeding. The Renewables Suppliers agrees to accept service by electronic means as provided for by the Commission’s Rules of Practice (*see* 83 Ill. Admin. Code §200.1050). Please include on the official Service List the following representatives of the Renewables Suppliers:

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7. WHEREFORE, the Renewables Suppliers respectfully request that the Commission grant this Petition to Intervene, permit the Renewables Suppliers to participate as parties in this proceeding, and grant such further or additional relief as it deems appropriate.

Respectfully submitted,

/s/ Owen E. MacBride

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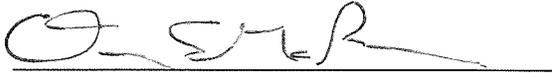
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Attorney for the Renewables Suppliers

STATE OF ILLINOIS)
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COUNTY OF COOK) SS.

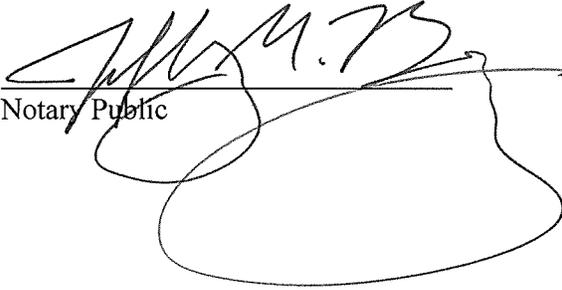
VERIFICATION

Owen E. MacBride, on oath, states that he is the attorney for the Renewables Suppliers listed in the foregoing Petition to Intervene, that he is authorized to make this verification on behalf of the Renewables Suppliers, that he has read the foregoing Petition to Intervene and is familiar with the matters set forth therein, and that the matters set forth in the Petition to Intervene are true and correct to the best of his knowledge, information and belief.

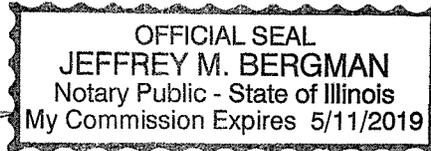


Owen E. MacBride

Subscribed and sworn to before me
this 28 day of September, 2016.



Notary Public



CERTIFICATE OF SERVICE

The undersigned attorney certifies that he caused copies of the Renewables Suppliers' Petition to Intervene in Docket 16-0453 to be served on the persons shown below by electronic mail on September 28, 2016.

/s/ Owen E. MacBride
Owen E. MacBride
Attorney for the Renewables Suppliers

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