

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

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	:	

**VERIFIED 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 27, 2016, the Illinois Power Agency ("IPA") filed, with the Commission, a Petition for Approval of the 2017 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 2017 Electricity Procurement Plan dated September 27, 2016 (“2017 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 2017 through May 2022.
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: September 29, 2016

Respectfully submitted,



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VERIFICATION

I, Brad Klein, state that I have read the foregoing Verified Petition to Intervene of the Environmental Law & Policy Center for ICC Docket No. 16-0453, that I know the contents thereof, and that to the best of my knowledge, information and belief, based upon reasonable inquiry, the contents are true and correct.



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STATE OF ILLINOIS)
) SCT.
COUNTY OF COOK)

The foregoing instrument was subscribed, sworn to and acknowledged before me by
Bradley Klein on this the 29th day of September, 2016.



Notary Public
My Commission Expires: 2017

