

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Power Agency)	
)	Docket 16-0453
)	
Petition for Approval of the 2017 IPA)	
Procurement Plan Pursuant to Section)	
16-111.5(d)(4) of the Public Utilities Act)	

**VERIFIED PETITION TO INTERVENE OF
AMEREN ILLINOIS COMPANY**

COMES NOW Ameren Illinois Company d/b/a Ameren Illinois (AIC), by its undersigned attorneys, pursuant to 83 Ill. Admin. Code § 200.200, and hereby respectfully petitions the Illinois Commerce Commission (Commission) for leave to intervene and participate in this docket. In support of this Petition, AIC states as follows:

1. This docket was initiated by the Illinois Power Agency (IPA) filing its Petition for Approval of the 220 ILCS 5/16 111.5(d) Procurement Plan (Petition) on September 27, 2016. Attached to the Petition is the IPA's Draft Power Procurement Plan for the period beginning June 2017 through May 2022 (Procurement Plan). The IPA has submitted to the Commission its proposed plan for the procurement of electricity for certain retail customers of AIC.

2. AIC has an interest in the subject matter of this docket, and cannot be adequately represented by any other party in this case. The IPA's Procurement Plan sets forth a procurement approach that will secure power and energy supply products to meet the supply needs of eligible retail customers served by AIC. AIC is required to procure power and energy for eligible retail customers according to the applicable provisions of Section 1-75 of the Illinois Power Agency Act and Section 16-115 of the

Public Utilities Act. Because AIC is required to purchase power and energy products to serve its customers pursuant to the IPA's Procurement Plan, AIC should be permitted to participate as a party in this case.

3. AIC 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.

4. Copies of all pleadings, notices and correspondence in this docket should be sent to the undersigned.

WHEREFORE, Ameren Illinois Company respectfully requests leave to intervene and to participate as a party in this proceeding.

Dated: September 30, 2016

Respectfully submitted,

AMEREN ILLINOIS COMPANY
d/b/a Ameren Illinois



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CERTIFICATE OF SERVICE

I, Kristol Whatley Simms, Counsel for Ameren Illinois Company, hereby certify that a copy of the foregoing *Verified Petition to Intervene* was filed on the Illinois Commerce Commission's e-Docket and was served electronically to all parties of record in Docket 16-0453 on this 30th day of September, 2016.



Kristol Whatley Simms