

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Power Agency)	
)	
)	ICC Docket No. 16-0453
Petition for Approval of the 2017 IPA)	
Procurement Plan Pursuant to 220 ILCS 5/16-)	
111.5(d)(4))	
)	

**VERIFIED PETITION TO INTERVENE OF NATURAL RESOURCES DEFENSE
COUNCIL**

Now comes Natural Resources Defense Council, (NRDC), by its attorneys, and pursuant to 83 Ill. Admin. Code 200.200, for its Petition to Intervene in this proceeding, states as follows:

1. NRDC is a nationwide nonprofit corporation organized under the laws of the State of New York with over 30 years of experience working on state energy policy, including utility regulation and energy efficiency.

2. NRDC's membership includes approximately 25,000 Illinois residents. A large number of those members are residential customers of Ameren Illinois Company (Ameren), Commonwealth Edison ("ComEd"), and MidAmerican Energy Company ("MidAmerican") (collectively, "Utilities").

3. This proceeding involves the investigation into a petition filed by the Illinois Power Agency requesting approval of its 2017 Electricity Procurement Plan (Plan). The Plan approved by this Commission will directly and materially affect the electric service and rates of the members of NRDC that are customers of the Utilities.

4. NRDC's members that are also customers of the Utilities have an interest in ensuring that utility rates and regulations encourage customers to use their energy efficiently and promote investment in cost-effective energy efficiency and renewable resources.

5. NRDC has sufficient interest in the proceeding, and its appearance and participation will

not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.

6. No other party can adequately protect the interests of NRDC.

7. NRDC agrees to accept service by electronic means.

8. Correspondence and other communication in regard to this matter should be served upon

the following person:

Ann Alexander
Senior Attorney, Midwest Program
Natural Resources Defense Council
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WHEREFORE, for the foregoing reasons, Natural Resources Defense Council requests that its Petition to Intervene be granted and that it be accorded full party status in this docket.

Dated: October 3, 2016

Respectfully submitted,

Natural Resources Defense Council



By: _____
Ann Alexander

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By: _____

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STATE OF ILLINOIS)

COUNTY OF COOK)

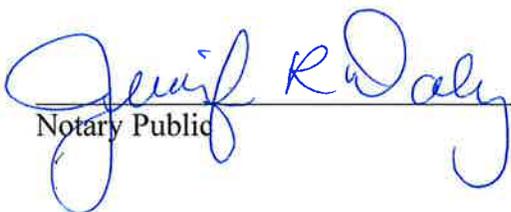
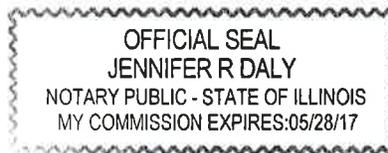
Verification

I, Ann Alexander, being first duly sworn, depose and state that I am counsel for the Natural Resources Defense Council, and that I have read the foregoing Petition to Intervene and know the contents thereof and the statements therein contained are true, to the best of my knowledge, information, and belief.



Ann Alexander
Natural Resources Defense Council

Subscribed and Sworn
to before me this 3rd day
of October, 2016



Notary Public