STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission On its Own Motion	)	
	)	Docket No. 13-0506
Investigation of Applicability of Sections 16-122 and 16-108.6 of the Public Utilities Act	)	

VERIFIED PETITION TO INTERVENE OF
THE RETAIL ENERGY SUPPLY ASSOCIATION

The Retail Energy Supply Association ("RESA") by and through its attorney, Gerard T. Fox, pursuant to 83 Illinois Admin. Code Section 200.200, hereby petitions the Illinois Commerce Commission ("Commission") to intervene in the above-captioned proceeding and, in support of this petition, states as follows:

1. On September 4, 2013, the Commission initiated this proceeding to commence an investigation regarding the applicability of Sections 16-122 and 16-108.6 of the Public Utilities Act. These sections pertain to the release of customer-specific information by electric utilities.

2. The Retail Energy Supply Association is a broad and diverse group of retail energy suppliers who share the common vision that competitive retail energy markets deliver a more efficient, customer-oriented outcome than a regulated utility structure. RESA is devoted to working with all stakeholders to promote vibrant and sustainable competitive retail energy markets for residential, commercial and industrial consumers.[1]

[1] RESA's members include AEP Energy, Inc.; Champion Energy Services, LLC; ConEdison *Solutions*; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Energetix, Inc.; GDF SUEZ Energy Resources NA, Inc.; Hess Corporation; Homefield Energy; IDT Energy, Inc.; Integrys Energy Services, Inc.; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; NRG, Inc.; PPL EnergyPlus, LLC; Stream Energy; TransCanada Power Marketing Ltd.; and TriEagle Energy, L.P.. The

3. As a trade association with members that are active Alternative Retail Electric Suppliers ("ARES") providing service to retail electric customers in the service territories of Ameren Illinois Company and Commonwealth Edison Company, RESA has business interests that may be materially affected by the outcome of this proceeding in which the Commission is considering the subject of the release of customer-specific information by electric utilities to third parties, including ARES.

4. Moreover, RESA's intervention in the instant proceeding will provide the Commission with the important viewpoint of an association that specifically represents the interests of national competitive suppliers.

5. For purposes of receiving service in this proceeding, RESA requests that the following persons be placed on the official service list:

All correspondence to RESA should be addressed to:

The Law Offices of Gerard T. Fox
Two Prudential Plaza
180 North Stetson
Suite 3500
Chicago, IL 60601
(312) 268-5674
gerardtfox@aol.com

6. The granting of the instant Petition to Intervene will not delay this proceeding. RESA agrees to accept the status of the record as it exists as of the date of the instant petition and to be bound by rulings and orders in the instant proceeding as of the date of the instant petition.

8. RESA 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).

---

comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of RESA.

WHEREFORE, for the foregoing reasons, the Retail Energy Supply Association requests that its Petition to Intervene be granted and that it be accorded full party status in this docket.

Dated: September 19, 2013

Respectfully submitted,

Retail Energy Supply Association

By: /s/Gerard T. Fox
Gerard T. Fox

Law Offices of Gerard T. Fox
Two Prudential Plaza
180 North Stetson
Suite 3500
Chicago, IL 60601
(312) 268-5674
gerardtfox@aol.com

STATE OF ILLINOIS)
) **SS**
COUNTY OF COOK)

VERIFICATION

Gerard T. Fox, being first duly sworn, on oath deposes and says that he is an attorney for the Retail Energy Supply Association, that he has read the foregoing Verified Petition to Intervene, that he knows of the contents thereof, and that the same is true to the best of his knowledge, information, and belief.

/s/Gerard T. Fox
Gerard T. Fox

Subscribed and sworn to me
This 19th day of September 2013

OFFICIAL SEAL
CLAUDIA A GUNDERSON
NOTARY PUBLIC-STATE OF ILLINOIS
MY COMMISSION EXPIRES 08/23/2016

NOTICE OF FILING

Please take note that on September 19, 2013 I caused to be filed via e-docket with the Chief Clerk of the Illinois Commerce Commission, the attached Verified Petition to Intervene of the Retail Energy Supply Association in this proceeding.

Dated: September 19, 2013

/s/Gerard T. Fox
Gerard T. Fox

CERTIFICATE OF SERVICE

I, Gerard T. Fox, certify that I caused to be served copies of the foregoing Verified Petition to Intervene of the Retail Energy Supply Association upon the parties on the service list maintained on the Illinois Commerce Commission's eDocket system for the instant docket via electronic delivery on September 19, 2013.

/s/ Gerard T. Fox
Gerard T. Fox