

**OFFICIAL FILE  
ILLINOIS COMMERCE COMMISSION**

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**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Illinois Power Agency :  
: :  
Petition and Request to extend :  
date to prepare procurement plan. :

Docket No. 08-0450

ILLINOIS  
COMMERCE COMMISSION  
2008 JUL 24 11:15 AM  
CHIEF CLERK'S OFFICE

**PETITION AND REQUEST TO EXTEND  
DATE TO PREPARE PROCUREMENT PLANS**

Pursuant to Section 16-111.5 of the Public Utilities Act (the "Act"), the Illinois Power Agency ("IPA") respectfully petitions and requests the Illinois Commerce Commission (the "Commission") to extend the date for preparation of procurement plans by the IPA in 2008. In support of this Petition, the IPA states as follows:

1. The IPA is a new state agency created pursuant to Section 1-15 of the Illinois Power Agency Act ("IPAA"), 20 ILCS 3855/1-1 et seq. One of the goals and objectives of the IPA as set forth in Section 1-5 of the IPAA is to "Develop electricity procurement plans to ensure adequate, reliable, affordable, efficient, and environmentally sustainable electric service at the lowest total cost over time, taking into account any benefits of price stability, for electric utilities that on December 31, 2005 provided electric service to at least 100,000 customers in Illinois." 20 ILCS 3855/1-5.

2. Section 16-111.5 of the Act provides that "Beginning in 2008, the Illinois Power Agency shall prepare a procurement plan by August 15th of each year, or such other date as may be required by the Commission." 220 ILCS 5/16-111.5(d)(2). The IPA has been diligently working to prepare the procurement plans currently due August

15, 2008 (for the procurement year beginning June 1, 2009). However, the IPA requests that the Commission allow the IPA an additional 19 days for the preparation of procurement plans in 2008 by requiring those procurement plans to be prepared by September 3, 2008.

3. The extension requested by this Petition is reasonable and appropriate, and will facilitate the IPA's preparation of electricity procurement plans that meet the goals and requirements of the Act and the IPAA. The IPA is a newly established state agency that is currently performing the administrative tasks necessary to establish and set up a state agency, including but not limited to the selection and hiring of employees. The time and resources required for these start up tasks has necessarily reduced the time and resources that could be devoted by the IPA to preparing the procurement plans due this year.

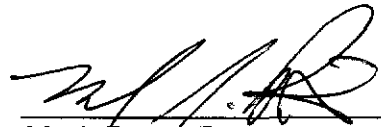
4. In addition, the procurement plans to be prepared this year will be the first procurement plans prepared by the IPA. While the IPA has been able to review and benefit from the experience gained by the procurement plans prepared by the utilities and reviewed by the Commission in 2007, the first time status of the IPA prepared procurement plans for 2008 has and will require the IPA to devote a substantial amount of time reviewing background and other basic information.

5. Finally, the short extension sought by this Petition will not prejudice or harm in any way the ability to implement and execute the procurement plans ultimately prepared by the IPA and approved by the Commission.

WHEREFORE, for all the reasons set forth above, the IPA respectfully requests that the Commission (i) act on this Petition as soon as possible on or before August 13, 2008; and (ii) grant the IPA's request for an additional 19 days to prepare the procurement plans in 2008 by requiring the procurement plans to be prepared by September 3, 2008.

Respectfully submitted,

Illinois Power Agency

A handwritten signature in black ink, appearing to read 'M. Pruitt', is written over a horizontal line.

Mark Pruitt, Director  
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Dated: July 24, 2008

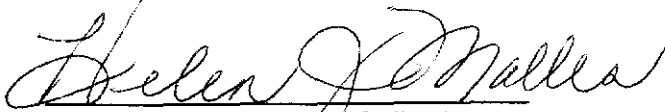
STATE OF ILLINOIS     )  
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COUNTY OF COOK        )

**VERIFICATION**

I, Mark Pruitt, on oath, state that I am an the Director of the Illinois Power Agency, that I have read the foregoing Petition and Request To Extend Date To Prepare Procurement Plans and know the contents thereof, and that the statements contained therein are true and correct to the best of my knowledge, information and belief.

  
\_\_\_\_\_  
Mark Pruitt

Subscribed and sworn to before  
me this 24 day of July, 2008

  
\_\_\_\_\_  
Notary Public, State of Illinois

