

**OFFICIAL FILE**  
**ILLINOIS COMMERCE COMMISSION** STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

**ORIGINAL RECEIVED**  
OCT 08 2014

ILLINOIS COMMERCE COMMISSION  
CHIEF CLERK'S OFFICE

ILLINOIS POWER AGENCY )  
)  
Petition for approval of the 2015 IPA ) ICC Docket No. 14-0588  
Procurement Plan Pursuant to Section 16- )  
111.5(d)(4) of the Public Utilities Act )

**VERIFIED PETITION FOR LEAVE TO  
INTERVENE OF SARGAS, INC.**

Now comes Sargas, Inc. ("Sargas") and pursuant to the Rules of Practice of the Illinois Commerce Commission ("Commission"), 83 Ill. Adm. Code, Section 200.00, petitions to intervene and be made a party in the above captioned proceeding, In support thereof Sargas state as follows:

1. On September 29, 2014, the Illinois Power Agency (IPA) filed with the Commission its Petition for Approval of the Procurement Plan ("Plan") as required by 220 ILCS 5/16-111.5(d). The Plan sets forth the IPA's plan for the procurement of power for certain customers for the period of 2015 through 2020.

2. Sargas is in the process of developing a commercial scale clean coal technology power plant at Mattoon, Illinois. Sargas has asked the IPA to include a competitive procurement process for clean coal technology in the Plan and the IPA has declined. Sargas believes the Commission has the responsibility and authority to modify the Plan to include a competitive procurement process for clean coal technology. The Commission's decisions regarding the Plan will have a great effect on the business interests of Sargas and consequently, Sargas has an interest in the subject matter of this docket.

3. Sargas as actively participated in the Power Procurement Planning process, including meeting with the Illinois Power Agency prior release of the 2015 Draft Procurement Plan and submitting comments on the 2015 Draft Procurement Plan.

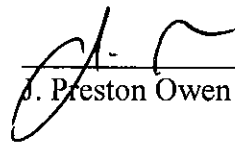
4. Sargas agrees to accept service by electronic means provided for in Section 200.1050 of the Commission's Rule of Practice. 83 Ill. Admin Code Section 200.1050.

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

WHEREFORE, Sargas, Inc. respectfully requests leave to intervene and to participate as a full party in this proceeding.

Dated this the 6<sup>th</sup> day of October 2014.

Respectfully Submitted.  
Sargas, Inc.



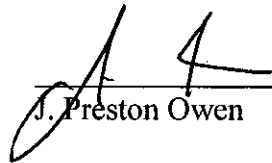
---

J. Preston Owen  
Certified Public Accountant  
Attorney-at-Law  
1 Lafayette Avenue  
P.O. Box 404  
Mattoon, IL 61938  
(217) 962-0123  
[prestonowen@consolidated.net](mailto:prestonowen@consolidated.net)

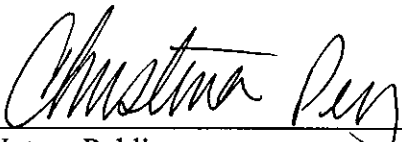
STATE OF ILLINOIS            )  
                                          )  
COUNTY OF COLES            )            SS

**VERIFICATION**

J. Preston Owen, being first duly sworn, on oath deposes and states that he is an attorney for Sargas, Inc., that he has read the foregoing Verified Petition for Leave to Intervene of Sargas, Inc., that he knows of the contents thereof, and that the same is true to the best of his knowledge, information and belief.

  
\_\_\_\_\_  
J. Preston Owen

Subscribed and sworn to me  
this the 6<sup>th</sup> day of October, 2014.

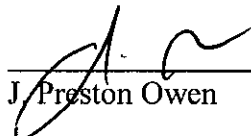
  
\_\_\_\_\_  
Notary Public

My Commission Expires: 3-22-15



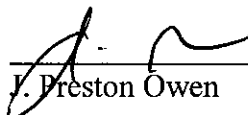
**NOTICE OF FILING**

On October 6<sup>th</sup>, 2014, I caused to be filed with the Chief Clerk of the Illinois Commerce Commission the attached Verified Petition for Leave to Intervene of Sargas, Inc. in this proceeding.

  
\_\_\_\_\_  
J. Preston Owen

**CERTIFICATE OF SERVICE**

I, J. Preston Owen, certify that I caused to be served copies of the foregoing Verified Petition for Leave to Intervene of Sargas, Inc. upon the parties on the service list maintained on the Illinois Commerce Commission's e-docket system for the instant docket via electronic delivery on October 6, 2014.

  
\_\_\_\_\_  
J. Preston Owen