

**STATE OF ILLINOIS
ILLINIOS COMMERCE COMMISSION**

Commonwealth Edison Company)	
)	
Petition for the Establishment of)	
Performance Metrics under Section 16-)	Docket No. 25-0514
108.18(e) of the Public Utilities Act.)	
)	

**VERIFIED PETITION TO INTERVENE OF THE ENVIRONMENTAL LAW &
POLICY CENTER, NATURAL RESOURCES DEFENSE COUNCIL,
AND VOTE SOLAR**

Pursuant to 83 Ill. Admin. Code § 200.200, the Environmental Law & Policy Center (“ELPC”), Natural Resources Defense Council (“NRDC”), and Vote Solar petition the Illinois Commerce Commission for leave to intervene in the above-captioned matter. In support of its petition, ELPC, NRDC, and Vote Solar state the following:

1. ELPC is a not-for-profit organization that works to promote environmentally-sound energy policies in Illinois and throughout the Midwest. Among ELPC’s priorities are the development and expansion of distributed renewable energy technologies, as well as fair and equitable access to those technologies. ELPC and its members have a longstanding interest in developing and promoting policies and programs necessary to support customer access to solar photovoltaics and other clean energy technologies. ELPC regularly intervenes and fully participates as a party in Commission cases involving Illinois utilities and relating to the development and compensation of distributed renewable energy technologies.

2. NRDC is a nonprofit corporation organized under the laws of the State of New York with a regional office in Illinois. NRDC has members in Illinois who advocate for clean energy, affordability, and prudent investments in the grid. NRDC has decades of experience working on

federal and state energy policy, including the decarbonization of the electricity sector and energy efficiency program design and planning. NRDC has members who live in Illinois, use electricity, and pay electric bills in Illinois, including members who are customers of Commonwealth Edison (“ComEd”) and Ameren Illinois. NRDC and its members have a longstanding commitment to advancing policies and programs that promote clean energy, enhance energy efficiency, and ensure affordability. Moreover, NRDC and its members are dedicated to protecting the environment, public health, and natural resources within the State of Illinois and across the broader Midwest region.

3. Vote Solar is a non-profit organization working to foster economic opportunity, promote energy independence, and fight climate change by making solar a mainstream energy resource across the United States. Since 2002, Vote Solar has engaged in state, local, and federal advocacy to remove regulatory barriers and implement key policies needed to bring solar to scale. Vote Solar is not a trade group and does not have corporate members. Vote Solar has more than 70,000 members across the United States, including members and supporters in ComEd’s service territory.

4. On May 21, 2025, ComEd filed a petition for approval of performance and tracking metrics, as well as a proposed update to the Rider PIM – Performance Incentive Metrics previously approved in ICC Docket No. 22-0067, under Section 16-108.18(e) of the Public Utilities Act.

5. ELPC, NRDC, and Vote Solar were active participants in Docket No. 22-0067 and will be affected by the outcome of this case. ELPC, NRDC, and Vote Solar have a direct interest in ensuring that ComEd’s performance metrics support the attainment of CEJA’s (Public Act 102-0662) climate, equity, and affordability goals. The outcome of this proceeding will affect how the utility is evaluated and incentivized to deliver on those priorities, particularly in areas like DER deployment, reliability, and energy burden reduction.

6. ELPC, NRDC, and Vote Solar agree to accept service by electronic means per Section 200.1050 of the Commission's Rules of Practice.

7. Copies of all pleadings, notices, and correspondence in this docket should be sent to the following individuals:

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WHEREFORE, for the above stated reasons, ELPC, NRDC, and Vote Solar request that leave to intervene be granted by the Commission and it be made a party to this proceeding, and requests that all orders, notices, correspondence, pleadings, testimony and other documents be served upon the undersigned.

Dated: June 25, 2025

Respectfully submitted,

/s/ *Bradley Klein*

Bradley Klein

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VERIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in the above Petition to Intervene are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Bradley Klein

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Dated: June 25, 2025