

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Commonwealth Edison Company)	
)	
Petition for the Establishment of)	Docket No. 25-0514
Performance Metrics under Section)	
16108.18(e) of the Public Utilities Act.)	

**VERIFIED PETITION TO INTERVENE OF THE
ENVIRONMENTAL DEFENSE FUND**

Pursuant to 83 Ill. Admin. Code § 200.200, the Environmental Defense Fund (“EDF”) petitions the Illinois Commerce Commission (the “Commission”) for leave to intervene as a party in the above-captioned proceeding. In support of this Petition, EDF states as follows:

1. EDF is a national environmental nonprofit organization whose mission is to preserve the natural systems on which all life depends. Guided by science and economics, EDF finds practical and lasting solutions to the most serious environmental problems. EDF has a strong interest in minimizing the electric industry’s significant contribution to climate change and other environmental and environmental justice problems, and in ensuring an equitable clean energy transition.

2. EDF has over 12,000 members in Illinois. Many of these members use utility electric service, and pay electric bills in Illinois, including members who are customers of Commonwealth Edison (“ComEd”). EDF members care about how Illinois protects and uses its resources and land and about its energy policy. EDF and its members have a longstanding interest in developing and promoting policies and programs that promote clean energy; safety; reliability and affordability, and protect the environment; public health; and natural resources in Illinois and across the Midwest.

3. On May 21, 2025, ComEd petitioned the Commission to approve its Performance and Tracking Metrics Plan for 2028-2031 (“PM Plan 2”), proposing seven performance metrics and thirty-two tracking metrics under Section 16108.18(e) of the Public Utilities Act. ComEd concurrently filed testimony, exhibits, and schedules in support of its PM Plan 2.

4. EDF and its members will be materially affected by the outcome of this docket. The Commission’s decision in this proceeding will impact how Illinois uses its resources and land. It will determine how and whether the energy policy of Illinois promotes clean energy, safety, reliability, affordability, and protects the environment, public health, and natural resources.

5. EDF seeks leave to intervene in this proceeding to protect the interests of its members under 83 Ill. Admin. Code §§ 200.200 and 200.520 and provide its perspective and those of its members through appropriate testimony and argument.

6. No other party can adequately represent EDF’s interests in this matter.

7. EDF agrees to accept service by electronic means as provided for in 83 Ill. Admin. Code § 200.1050.

8. EDF accepts the status of the record as it exists at the time of this Petition to Intervene.

9. For purposes of the Service List, all documents should be served upon the following:

Curt Stokes
Environmental Defense Fund
237 Madelines Park Cir.
Jefferson City, MO 65109
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WHEREFORE, EDF respectfully requests that the Commission grant this Petition to Intervene.

Respectfully submitted,

A handwritten signature in black ink that reads "Curt Stokes". The signature is written in a cursive, flowing style.

Dated: June 26, 2025

Curt Stokes
Environmental Defense Fund
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VERIFICATION BY CERTIFICATION

Pursuant to 83 Ill. Admin. Code § 200.130 and 735 ILCS 5/1-109, 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 this instrument 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.

A handwritten signature in black ink that reads "Curt Stokes". The signature is written in a cursive, flowing style.

Curt Stokes
Environmental Defense Fund