STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

IN RE ENBRIDGE PIPELINE ILLINOIS LLC.	)	
	)	**07-0446**
Petition pursuant to Section 8-503, 8-509, 15-101 and 15-401 of the Public Utilities Act for a certificate by pipeline, and for entry of an order authorizing and directing construction and operation of a petroleum pipeline and granting authority to exercise eminent domain	)	

PETITION TO INTERVENE

NOW COME Janice Kay Kerley by and through his/her/their attorney, Thomas J. Pliura, and respectfully request(s) leave to Intervene in the above-referenced matter. In support of said petition, petitioner states as follows:

1. Petitioners' Names, address and phone number:

   Janice Kay Kerley
   RR2 Box 326
   Clinton, IL 61727

   217 972-8210
   No fax other than Attorney

2. Petitioners' Attorney:

   Thomas J. Pliura
   210 E. Center Street
   P.O. Box 130
   LeRoy, IL 61752
   (309) 962-2299
   (309) 962-4646 (Facsimile)
   e-mail: tom.pliura@zchart.com

3. Petitioner(s) is/are individuals residing in Dewitt County, Illinois and owners of real estate in Dewitt County, said real estate being in the path of the proposed pipeline route.

4. Petitioner(s) seek to intervene herein, and be treated as a party to these proceedings.

5. Petitioner(s) seek such affirmative relief as may be just and reasonable after the presentation of evidence herein.

6. Petitioner(s) agree to accept service by electronic means upon their attorney herein at the address listed above.

WHEREFORE, Petitioner(s), respectfully pray that the Illinois Commerce Commission grant this Petition to Intervene, and for such other and further relief as may be just and reasonable under the circumstances.

Respectfully Submitted,

Thomas J. Pliura
Attorney for Petitioner(s)

Janice Kay Kerley
Petitioner(s)

Thomas J. Pliura
210 E. Center Street
P.O. Box 130
LeRoy, IL 61752
(309) 962-2299 (Tel)
(309) 962-4646 (Facsimile)
e-mail: tom.pliura@zchart.com

VERIFICATION

STATE OF ILLINOIS)
) SS
COUNTY OF McLEAN)

Thomas Pliura, upon his oath being first duly sworn, states that he is the attorney for Petitioners seeking leave to intervene and has read the foregoing Petition, is familiar with the facts stated therein, and the same are true and correct to the best of his information, knowledge and belief.

Thomas J. Pliura

Subscribed and sworn to me this
4th day of October 2007.

Notary Public

OFFICIAL SEAL
DEBORAH L BRADD
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:05/06/11

Thomas J. Pliura
210 E. Center Street
P.O. Box 130
LeRoy, IL 61752
(309) 962-2299 (Tel)
(309) 962-4646 (Facsimile)

PROOF OF SERVICE

The undersigned certifies that on this 4th day of October, 2007, he served a copy of the foregoing Petition To Intervene and Verification upon the individuals listed in the attached service list, by U. S. Mail, with first class postage affixed, and also via electronic mail.

Thomas J. Pliura

Thomas J. Pliura
210 E. Center Street
P.O. Box 130
LeRoy, IL 61752
(309) 962-2299 (Tel)
(309) 962-4646 (Facsimile)
e-mail: tom.pliura@zchart.com

SERVICE LIST

James Adams
Adams Land Corp.
20365 E. 1200 North Rd.
Bloomington IL 61704

Gerald Ambrose
Atty. for Applicant
Sidley Austin LLP
One S. Dearborn
Chicago IL 60603

Mary Babb
1632 N. Towanda Barnes Rd.
Normal IL 61761

John L Benjamin
2375 Interlackin Circle
Cleveland TN 37312

Roy P Farwell
Attorney
Union Pacific Railroad Company
100 North Broadway, Suite 1500
St. Louis MO 63102

Doris Grunloh
20514 N. 2150 East Rd.
Towanda IL 61776-9413

William M Hacker
1812 Cherry Rd.
Oswego IL 60543

Thomas J Healey
Counsel - Regulatory
Illinois Central Railroad Company
17641 S. Ashland Avenue
Homewood IL 60430

Andrew Holstine
Atty. for Intervenors
The Wochner Law Firm
707 Skokie Blvd., Ste. 500
Northbrook IL 60062

William J Holstine
Trustee of Alice E. Temple Trust
c/o Hertz Farm Management
PO Box 500
Nevada IL 50201

Joel W Kanvik
Senior Counsel
Enbridge Energy Company, Inc.
1100 Louisiana
Houston TX 77002

Carlisle E Kelly
25457 Chestnut Dr.
LeRoy IL 61752

Donald Korte
Korte Farm Partnership
400 Douglas St.
Park Forest IL 60466

James V Olivero
Illinois Commerce Commission
527 E. Capitol Ave.
Springfield IL 62701

Jon Robinson
Atty. for Intervenors
Bolen Robinson & Ellis, LLP
202 S. Franklin St., 2nd Floor
Decatur IL 62523

Mercer Turner
Atty. for Intervenors
Law Office of Mercer Turner, P.C.
202 N. Prospect, Ste. 202
Bloomington IL 61701

Janis Von Qualen
Illinois Commerce Commission
527 E. Capitol Ave.
Springfield IL 62701