

**ORIGINAL**

**OFFICIAL FILE  
ILLINOIS COMMERCE COMMISSION**

ILLINOIS  
COMMERCE COMMISSION

State Of Illinois

**ILLINOIS COMMERCE COMMISSION** 2007 DEC 31 11:07 AM MS

CHIEF CLERK'S OFFICE

IN RE ENBRIDGE PIPELINES (ILLINOIS) L.L.C.

APPLICATION PURSUANT TO SECTIONS 8-503, 8-509,  
AND 15-401 OF THE PUBLIC UTILITIES ACT/THE COMMON  
CARRIER BY PIPELINE LAW TO CONSTRUCT AND  
OPERATE A PERTROLEUM PIPELINE AND, WHEN  
NECESSARY, TO TAKE PRIVATE PROPERTY AS PROVIDED)  
BY THE LAW OF EMINENT DOMAIN

Docket No. 07 - 0446

The Natural Resources Defense Council (NRDC), pursuant to the Rules of Practice of the Illinois Commerce Commission, 83 Ill. Adm. Code, Section 200.200, hereby petitions the Illinois Commerce Commission to be permitted to intervene as a party in the proceeding captioned above. In support of its Petition, NRDC states as follows:

1. NRDC is a not-for-profit membership organization, incorporated under the laws of the State of New York and in good standing with the State of Illinois, with its Midwest Program office at 101 North Wacker Drive, Suite 609, Chicago, Illinois, 60606. NRDC has over 27,000 members and on-line activists in Illinois, and 1.2 million members and on-line activists nationally.

2. NRDC and its members have a long-standing interest and expertise promoting safe, clean, reliable energy uses and resources; protecting clean air, clean water and natural habitat; preventing global warming; and, promoting alternatives to fossil fuel.

3. On August 16, 2007, Enbridge Pipelines (Illinois) L.L.C. ("Enbridge Pipelines"), petitioned the Illinois Commerce Commission for the issuance to it of a Certificate in Good Standing and the entry of an order authorizing Enbridge Pipelines to construct, operate, and maintain approximately 170 miles of new liquid petroleum pipeline from near Pontiac to Patoka, and authorizing Enbridge Pipelines to acquire private property in the manner provided by the law of eminent domain.

4. The results of this proceeding regarding the proposed petroleum pipeline for which Enbridge Pipelines seeks authorization in this proceeding to construct, operate, maintain and utilize the powers of eminent domain to achieve will have direct and profound impacts on clean air, clean water, critical habitat, global warming and the viability of safe, clean, and reliable energy in this state and the viability of alternatives to fossil fuels in Illinois.

5. NRDC and its members and activists within the State of Illinois will be directly and materially affected by the results of this proceeding and the proposed petroleum pipeline for which Enbridge Pipelines seeks authorization in this proceeding to construct, operate, maintain and utilize the powers of eminent domain to achieve.

6. NRDC agrees to accept service by electronic means as provided for in Section 200.1050 of the ICC's Rules of Practice (83 Ill. Adm. Code 200.1050).

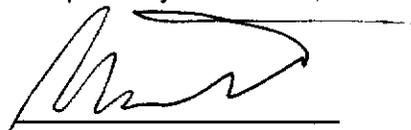
WHEREFORE, the Natural Resources Defense Council respectfully requests the Illinois Commerce Commission:

- (A) Grant the Natural Resource Defense Council's petition to intervene in the captioned proceeding;
- (B) Place on the official service list for receipt of all notices, pleadings, documents, and other materials relevant to this docket:

Shannon Fisk  
Staff Attorney, NRDC  
101 N. Wacker Drive, Suite 609  
Chicago, IL 60606  
(312) 780-7431  
[SFisk@nrdc.org](mailto:SFisk@nrdc.org)

Ann Alexander  
Senior Attorney, NRDC  
101 N. Wacker Drive, Suite 609  
Chicago, IL 60606  
(312) 780-7427  
[aalexander@nrdc.org](mailto:aalexander@nrdc.org)

Respectfully Submitted,



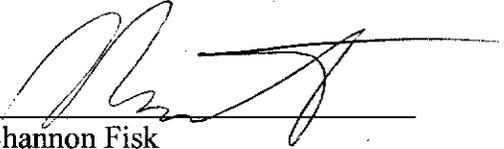
Shannon Fisk  
101 N. Wacker Drive, Suite 609  
Chicago, IL 60606  
[SFisk@nrdc.org](mailto:SFisk@nrdc.org)

December 27, 2007

STATE OF ILLINOIS            )  
  )SS  
COOK COUNTY                    )

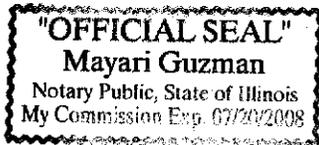
VERIFICATION

Shannon Fisk, being first duly sworn, on oath deposes and states that he is an attorney with the Natural Resources Defense Council, that he read the foregoing Petition to Intervene, that he knows its contents, and knows the contents to be true and accurate to the best of his knowledge and belief.



Shannon Fisk  
Natural Resources Defense Council  
101 North Wacker Drive, Suite 609  
Chicago, Illinois 60606  
(312) 780-7431  
FAX: (312) 663-9920  
[SFisk@nrdc.org](mailto:SFisk@nrdc.org)

SUBSCRIBED AND Sworn  
to me on this 27 day,  
December 2007.

 Notary Public

**State Of Illinois  
ILLINOIS COMMERCE COMMISSION**

IN RE ENBRIDGE PIPELINES (ILLINOIS) L.L.C. )  
)  
)  
)  
)

APPLICATION PURSUANT TO SECTIONS 8-503, 8-509, )  
AND 15-401 OF THE PUBLIC UTILITIES ACT/THE COMMON )  
CARRIER BY PIPELINE LAW TO CONSTRUCT AND )  
OPERATE A PERTROLEUM PIPELINE AND, WHEN )  
NECESSARY, TO TAKE PRIVATE PROPERTY AS PROVIDED )  
BY THE LAW OF EMINENT DOMAIN )  
)  
)  
)

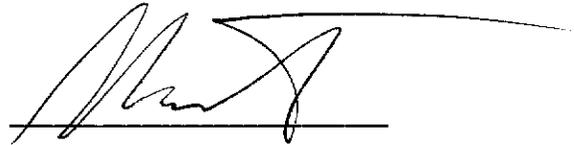
Docket No. 07 – 0446

**NOTICE OF FILING**

To: Service List

Please take notice that on December 27, 2007, I caused to be sent to Elizabeth A. Rolando, Chief Clerk, Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois, 62701, by U.S. Postal Service, the Natural Resource Defense Council's Petition For Leave to Intervene in the captioned proceeding.

Dated: December 27, 2007



Shannon Fisk

Natural Resources Defense Council

101 North Wacker Drive, Suite 609

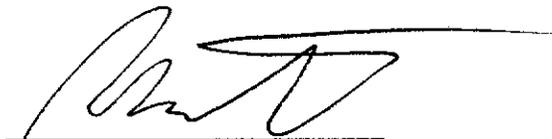
Chicago, Illinois 60606

SFisk@nrdc.org

**CERTIFICATE OF SERVICE**

I, Shannon Fisk, hereby certify that a copy of the Natural Resource Defense Council's ("NRDC") Petition to Intervene in the above captioned docket, was served upon the parties listed in the Service List for this docket electronically, in accordance with the Rules of Practice of the Illinois Commerce Commission.

Dated: December 27, 2007

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

Shannon Fisk

Natural Resources Defense Council

101 North Wacker Drive, Suite 609

Chicago, Illinois 60606

SFisk@nrdc.org