

**OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION**

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ORIGINAL
ILLINOIS COMMERCE
COMMISSION

Ameren Transmission Company of Illinois :

2012 DEC -4 A 11: 15

Petition for a Certificate of Public Convenience
and Necessity, pursuant to Section 8-406.1 of
the Illinois Public Utilities, and an Order
pursuant to Section 8-503 of the Public Utilities
Act, to Construct, Operate and Maintain a New
High Voltage Electric Service Line and Related
Facilities in the Counties of Adams, Brown,
Cass, Champaign, Christian, Clark, Coles,
Edgar, Fulton, Macon, Montgomery, Morgan,
Moultrie, Pike, Sangamon, Schuyler, Scott and
Shelby, Illinois. :

12-0598

CHIEF CLERK'S OFFICE

PETITION FOR LEAVE TO INTERVENE

Pursuant to Illinois Admin. Code § 200.200, Enbridge Pipelines (Illinois) L.L.C., Enbridge Pipelines (FSP) L.L.C., and CCPS Transportation, LLC (collectively "Enbridge Pipelines") hereby petition for leave to intervene in this proceeding. For and in support of this petition, Enbridge Pipelines state as follows:

1. Enbridge Pipelines (Illinois) L.L.C. is a certificated Illinois common-carrier-by-pipeline which was authorized by the Commission in Docket 07-0446 to construct, operate, and maintain a 36-inch crude oil pipeline along a route from an Enbridge terminal near Pontiac, Illinois to the pipeline hub at Patoka, Illinois where Enbridge has storage and connection facilities. ORDER, July 8, 2009. Enbridge Pipelines (FSP) L.L.C. is a Delaware limited liability company currently seeking certification as a common-carrier-by-pipeline in Docket No. 12-0347 and authorization to construct, operate, and maintain approximately 168 miles of new 36-inch crude oil pipeline along a route from the Enbridge facility near Pontiac -- "the Flanagan Terminal" -- to the Illinois/Missouri border near Quincy, Illinois, from which point the new pipeline will proceed on to Cushing, Oklahoma to connect to Enbridge facilities at

the Cushing Hub. The Application in Dkt. No. 12-0347 was filed on May 15, 2012; a "Proposed Order" is scheduled for filing not later than December 21, 2012. CCPS Transportation, LLC owns and operates the Spearhead Pipeline, a common carrier crude oil pipeline running from the Flanagan Terminal to the Cushing Hub. Each of the petitioners is an affiliate of various Enbridge entities which together operate and maintain an extensive network of international and interstate common carrier pipelines that transport crude petroleum to markets in the United States and Canada via the "Enbridge System."

2. The common carrier pipelines operated or to be operated by these petitioners occupy or will occupy pipeline rights-of-way that traverse various Illinois counties that will be affected by the construction and operation of the new high-voltage electric transmission line and related facilities proposed in the Application pending in this docket. The pipeline facilities owned and operated by these petitioners to intervene are or will be located in at least six (6) Illinois counties -- Adams, Brown, Christian, Fulton, Macon, and Shelby -- that will be crossed by the proposed transmission line. The construction and operation of the new transmission line has the potential to substantially affect the construction, operation, and maintenance of petitioners' pipelines (*e.g.*, pipelines are equipped with electric cathodic-protection systems that could be influenced by high-voltage electric current flows); as well, some of the Applicant's transmission lines and related facilities will unavoidably need to cross petitioners' rights-of-way and may need to be collocated with petitioners' Enbridge System facilities. For these reasons, petitioners may be affected by, and thus have a substantial interest in, the project at issue in this docket.

3. Enbridge Pipelines are represented by the following counsel, upon whom service may be made at the street and electronic addresses set forth below:

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Enbridge Pipelines

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Intervenors agree to accept service by electronic means at the above-stated addresses.

4. Enbridge Pipelines wish to participate in this proceeding as needed. No other party or potential intervenor is capable of representing these intervenors' interests in this proceeding.

WHEREFORE, Enbridge Pipelines respectfully request that they be permitted to intervene in this proceeding and be treated as parties pursuant to the Commission's Rules of Practice.

Respectfully submitted.

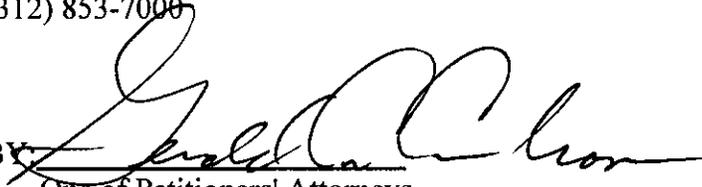
ENBRIDGE PIPELINES (ILLINOIS) L.L.C.
ENBRIDGE PIPELINES (FSP) L.L.C.
CCPS TRANSPORTATION, LLC

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Dated: November 30, 2012

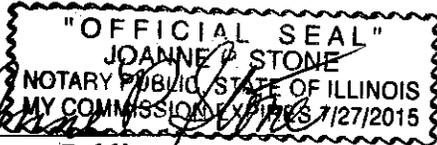
BY 
One of Petitioners' Attorneys

VERIFICATION

Gerald A. Ambrose, being sworn on oath, states that the foregoing "Petition to Intervene"
is true and accurate to the best of his knowledge, information, and belief.


Gerald A. Ambrose

SUBSCRIBED AND SWORN
To before me this 30th of
November, 2012



Notary Public

CERTIFICATE OF SERVICE

I, G. Darryl Reed, an attorney, certify that I caused copies of the Petition For Leave To Intervene, filed on behalf of on behalf of Enbridge Pipelines Illinois) L.L.C.; Enbridge Pipelines (FSP) L.L.C.; and CCPS Transportation, LLC Enbridge Pipelines (FSP) L.L.C., to be served on each of the parties listed on the service list via electronic or regular mail, this 30th day of November, 2012.

/s/ G. Darryl Reed

One of Its Attorneys

**ENBRIDGE PIPELINES (ILLINOIS) L.L.C.
ENBRIDGE PIPELINES (FSP) L.L.C.
CCPS TRANSPORTATION LLC**

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Moultrie, Pike, Sangamon, Schuyler, Scott and :
Shelby, Illinois. :

NOTICE OF FILING

PLEASE TAKE NOTICE that on this date we have filed with the Clerk of the Illinois Commerce Commission, the Petition For Leave To Intervene on behalf of Enbridge Pipelines Illinois) L.L.C.; Enbridge Pipelines (FSP) L.L.C.; and CCPS Transportation, LLC, in the above-captioned matter.

**ENBRIDGE PIPELINES (ILLINOIS) L.L.C.
ENBRIDGE PIPELINES (FSP) L.L.C.
CCPS TRANSPORTATION LLC**

By: /s/ G. Darryl Reed
One of Its Attorneys

Dated: November 30, 2012

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