

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Ameren Transmission Company of Illinois)
)
Petition for a Certificate of Public Convenience) Docket No. 12-0598
and Necessity, pursuant to Section 8-406.1 of)
the Illinois Public Utilities Act, 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.)

**VERIFIED PETITION TO INTERVENE OF LOCAL UNIONS 51 AND 702,
INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, AFL-CIO**

Pursuant to 83 Ill. Admin. Code 200.200, Local Unions 51 and 702, International Brotherhood of Electrical Workers, AFL-CIO ("IBEW Locals"), petition the Illinois Commerce Commission to intervene in the above-captioned proceeding. In support of their Petition, the IBEW Locals state:

1. Local 51, International Brotherhood of Electrical Workers ("IBEW Local 51"), whose main office is located in Springfield, Illinois, is a labor union and the collective bargaining representative of individuals employed by Ameren Illinois, Dynegy Midwest Generation, and Exelon Generation (f/k/a AmerGen Energy Company), among others. Local 51, IBEW has current collective bargaining agreements with these public utilities and power generating companies covering the wages, fringe benefits, and terms and conditions of employment of the bargaining unit employees it represents. Members of Local 51 perform outside linework, among other types of work.

2. Local 702, International Brotherhood of Electrical Workers ("IBEW Local 702"), whose main office is located in West Frankfort, Illinois, is a labor union and the collective bargaining representative of individuals employed by AmerenCIPS, AmerenIP, and Ameren Energy Generating Company, among others. IBEW Local 702 has current collective bargaining agreements with these public utilities and power generating companies covering the wages, fringe benefits, and terms and conditions of employment of the bargaining unit employees it represents. Members of Local 702 perform outside linework, among other types of work.

3. If Petitioner is granted a Certificate of Public Convenience and Necessity to construct, operate and maintain a new high voltage electric service line and related facilities in the State of Illinois and actually undertakes those functions, those events are likely to have a direct and material effect on IBEW Locals 51 and 702 and their members.

4. The interests of the IBEW Locals and their members are not adequately represented by any other party to this proceeding.

5. The IBEW Locals seek to intervene and be treated as a party in the proceeding and will accept service by electronic means as provided for in 83 Ill. Admin. Code Section 200.1050.

6. The IBEW Locals request that the following information be added to the service list:

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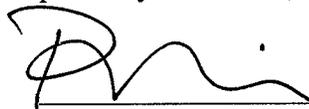
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WHEREFORE, the IBEW Locals respectfully petition the Commission for leave to
intervene in the above-captioned proceeding.

Respectfully submitted,



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STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS CITY)

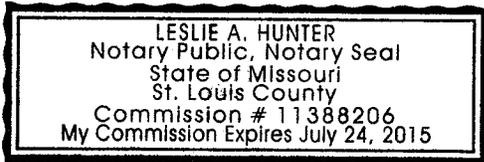
VERIFICATION

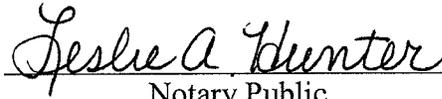
I, Rochelle G. Skolnick, first being duly sworn upon my oath, depose and state that I am one of the attorneys for IBEW Locals, that I have read the above and foregoing Petition to Intervene and know the contents thereof; and that said contents are true in substance and in fact.



Rochelle G. Skolnick

Subscribed and sworn to before me this 11th day of March, 2013.





Notary Public

My Commission Expires: 7/24/15