

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

ROCK ISLAND CLEAN LINE LLC)	
)	
Petition for an Order granting Rock Island Clean)	
Line LLC a Certificate of Public Convenience and)	
Necessity pursuant to Section 8-406 of the Public)	
Utilities Act as a Transmission Public Utility and to)	Docket No. 12-0560
Construct, Operate and Maintain an Electric)	
Transmission Line and Authorizing and Directing)	
Rock Island Clean Line Pursuant to Section 8-503)	
of the Public Utilities Act to Construct an Electric)	
Transmission Line)	

**VERIFIED PETITION TO INTERVENE
OF THE NATURAL RESOURCES DEFENSE COUNCIL**

Pursuant to 83 Ill. Admin. Code § 200.200, the Natural Resources Defense Council (“NRDC”) petitions the Illinois Commerce Commission (“Commission”) for leave to intervene in the above-captioned matter. In support of its petition, NRDC states:

1. NRDC is a nationwide nonprofit corporation with over 30 years’ experience working on state and federal clean energy development energy policies.
2. NRDC’s membership includes approximately 25,000 Illinois residents.
3. This proceeding involves a proposed high voltage direct current transmission line which could deliver up to 3,500 megawatts of wind energy into Illinois.
4. The Commission order in this proceeding will directly and materially affect NRDC’s members in Illinois and throughout the country. NRDC’s members have an interest in increasing the generation and delivery of renewable energy in Illinois and throughout the Midwest, in reducing carbon emissions from the electric power sector, and in strengthening environmental protection.
5. NRDC has sufficient interest in this proceeding, and its appearance and

participation will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding. NRDC recognizes that the Commission has set a schedule for testimony in this proceeding and that some parties have filed testimony. NRDC accepts that schedule.

6. No other party can adequately protect the interests of NRDC.
7. NRDC agrees to accept service by electronic means.
8. Correspondence and other communications in regard to this matter should be

served upon the following parties:

John N. Moore
Senior Attorney – The Sustainable FERC Project
Natural Resources Defense Council
20 North Wacker Drive, Suite 1600
Chicago, IL 60606
(312) 651-7927
jmoore@nrdc.org

Rebecca Stanfield
Deputy Director of Policy, Midwest
Program
Natural Resources Defense Council
20 North Wacker Drive, Suite 1600
Chicago, IL 60606
(312) 651-7910
rstanfield@nrdc.org

Stephen J. Moore
Rowland & Moore LLP
200 West Superior Street, Suite 400
Chicago, Illinois 60654
(312) 803-1000
steve@telecomreg.com

WHEREFORE, for the above-stated reasons, NRDC requests that leave to intervene be granted by the Commission and it be made a party to this proceeding.

Respectfully submitted,



John N. Moore
Senior Attorney – The Sustainable FERC Project
Natural Resources Defense Council
20 North Wacker Drive, Suite 1600
Chicago, IL 60606
(312) 651-7927
jmoore@nrdc.org

Date: August 30, 2013

VERIFICATION

I, John N. Moore, state that I have read the foregoing Verified Petition to Intervene of the Natural Resources Defense Council for ICC Docket No. 12-0560, that I know the contents thereof, and that to the best of my knowledge, information and belief, based upon reasonable inquiry, the contents are true and correct.



John N. Moore
Senior Attorney – Sustainable FERC Project
Natural Resources Defense Council

STATE OF ILLINOIS)
)
COUNTY OF COOK)

The foregoing instrument was subscribed, sworn to and acknowledged before me, Cooper Foszcz, on this 30th day of August, 2013.



Notary Public

My Commission Expires: 6/11/16



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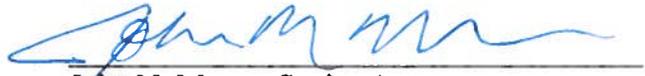
Docket No. 12-0560

NOTICE OF FILING

TO: Elizabeth Rolando, Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

All parties on the service list for ICC Docket No. 12-0560

Please take note that on August 30, 2013, I filed the attached Verified Petition to Intervene of the Natural Resources Defense Council in the above-captioned matter, via e-Docket, a copy of which is hereby served upon you.



John N. Moore, Senior Attorney
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CERTIFICATE OF SERVICE

I, John N. Moore, hereby certify that the foregoing document was served to all parties of record identified on the Commission's Service List for Docket No. 12-0560.



John N. Moore, Senior Attorney
(312) 651-7927
jmoore@nrdc.org