

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

**ORIGINAL**

Northern Illinois Gas Company )  
d/b/a Nicor Gas Company )  
Application for permanent Certificate )  
Of Public Convenience and Necessity, )  
Under Section 8-406 of the Public Utilities )  
Act, to construct, operate, and maintain gas )  
Distribution facilities and to transact the )  
Business of furnishing gas service to the public in )  
LaSalle County, Illinois )

Docket No. 15-0476

**ILLINOIS COMMERCE  
COMMISSION  
2015 OCT 19 P 2:28  
CHIEF CLERK'S OFFICE**

**PETITION TO INTERVENE**

Now comes R.C. Farm Partnership, Box 488, Somonauk, IL, to petition the Commission for leave to intervene in this proceeding. In supports of its petition, R.C. Farm Partnership states as follows:

1. The construction of a portion of the proposed utility facilities will be within the property owned by R.C. Farm Partnership.
2. It is likely that a ruling by the Commission in this proceeding will affect the rights and interests of R.C. Farm Partnership, owner of the subject property, because the property is farmland and has underground drainage tile at various unknown depths and unknown locations, many of which were installed 100+ years ago, and no written records were ever prepared or retained. Petitioners have already had an unsatisfactory experience with NIGAS/NICOR where on another parcel of farmland a tile line was compromised when a NIGAS/NICOR gas line was installed.
3. In order to protect the rights and interests, R.C. Farm Partnership should be granted leave to intervene as a party to this proceeding.

WHEREFORE, R.C. Farm Partnership prays that the Commission grants its Petition for Leave to Intervene as a party to this proceeding.

Respectfully submitted,

By: Beth Munder  
Beth Munder, General Partner  
R.C. Farm Partnership

Beth Munder  
General Partner  
R.C. Farm Partnership  
P.O. Box 488  
Somonauk, IL 60552

STATE OF ILLINOIS  
COUNTY OF LASALLE

**VERIFICATION**

I, Beth Munder, first being duly sworn upon oath depose that I have read the above and foregoing Petition to Intervene by me subscribed and know the contents thereof; that said contents are true in substance and in fact, except as to those matters stated upon information and belief, and as to those, I believe same to be true.

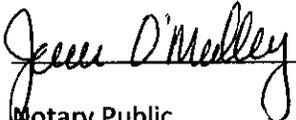
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Beth Munder, General Partner,

R.C. Farm Partnership

Subscribed and sworn to before me

This 9 day of Oct, 2015

  
\_\_\_\_\_  
Notary Public



**NOTICE OF FILING**

Please take notice that on Oct. 9<sup>th</sup>, 2015, Beth Munder, General Partner R.C. Farm Partnership, filed an original Petition for Leave to Intervene with Elizabeth A Rolando, Chief Clerk on the Illinois Commerce Commission, by deposit in the United States mail, first class postage prepaid.

**CERTIFICATE OF SERVICE**

I, Beth Munder, General Partner, R.C. Farm Partnership, on oath state that I served this notice of filing and the Petition for Leave to Intervene to each person on the attached service list, as indicated, on Oct 9<sup>th</sup>, 2015, by deposit in the United States mail, first class postage prepaid.



Beth Munder, General Partner

R.C. Farm Partnership

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