

IN THE APPELLATE COURT OF ILLINOIS
FOR THE FOURTH DISTRICT

SAVE OUR ILLINOIS LAND; SIERRA CLUB;)	
NATURAL RESOURCES DEFENSE)	
COUNCIL; WILLIAM KLINGELE,)	
Petitioners.)	
)	
v.)	Petition for Review
)	of Orders of the
ILLINOIS COMMERCE COMMISSION;)	Illinois Commerce Commission
DAKOTA ACCESS, LLC; ENERGY TRANSFER)	Docket Number 19-0673
CRUDE OIL COMPANY, LLC;)	
INTERNATIONAL BROTHERHOOD OF)	
ELECTRICAL WORKERS, LOCAL 702;)	
LABORERS' INTERNATIONAL UNION OF)	
NORTH AMERICA; SOUTHWESTERN)	
ILLINOIS LABORERS' DISTRICT COUNCIL;)	
GREAT PLAINS LABORERS' DISTRICT)	
COUNCIL; SOUTHERN AND CENTRAL)	
ILLINOIS LABORERS' DISTRICT COUNCIL)	
AND ITS AFFILIATED LOCAL UNIONS, 231,)	
622, 773, 1197,)	
Respondents.)	

Save Our Illinois Land, Sierra Club, Natural Resources Defense Council, and William Klingele (“Petitioners”) hereby petition the Court for review of the Order of the Illinois Commerce Commission (“Commission”) which granted the Joint Petition filed with the Commission by Dakota Access, LLC (“Dakota Access”) and Energy Transfer Crude Oil Company, LLC (“ETCO”) for an order pursuant to Section 8-503 of the Public Utilities Act, 220 ILCS 5/8-503, authorizing Dakota Access and ETCO to install additional pumping station facilities on their existing certificated common carrier crude oil pipelines in Illinois. The Commission entered its Order granting the Joint Petition on October 14, 2020, and denied the Application for Rehearing filed by Petitioners Save Our Illinois Land, Sierra Club, and William Klingele on December 2, 2020. Petitioners seek review of the following actions in Docket No. 19-0673: (1) the

Commission's denial of a petition for interlocutory review on April 1, 2020; (2) the Commission's denial of a petition for interlocutory review on June 4, 2020; (3) the Commission's adoption of the Order dated October 14, 2020; (4) the Commission's denial of the application for rehearing on December 2, 2020; and (5) all other rulings and orders of the Commission supporting those actions in the proceeding below. Petitioners seek relief reversing the above actions of the Commission and remanding this matter to the Commission for further proceedings and the entry of an order on remand in accordance with the Court's opinion and mandate.

Dated: January 5, 2021

By: /s/ John D. Albers
Attorney for Petitioners

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CERTIFICATE OF FILING AND SERVICE

I certify that on January 5, 2021, I electronically filed the foregoing Petition For Review with the Clerk of the Court for the Illinois Appellate Court, Fourth Judicial District, by using the Odyssey eFileIL system.

I further certify that, in accordance with Illinois Supreme Court Rule 335(b), the persons on the attached Service List from Illinois Commerce Commission Docket 19-0673 were served by transmitting the Petition For Review from my e-mail address to all primary e-mail addresses of record designated by those persons on January 5, 2021.

Under penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

/s/ John D. Albers

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**APPEAL TO THE APPELLATE COURT OF ILLINOIS
FOURTH JUDICIAL DISTRICT
FROM THE ILLINOIS COMMERCE COMMISSION**

SAVE OUR ILLINOIS LAND; SIERRA CLUB;)	Petition for Review of Orders of the
NATURAL RESOURCES DEFENSE)	Illinois Commerce Commission in its
COUNCIL; WILLIAM KLINGELE,)	Docket No. 19-0673
)	
Petitioners-Appellants.)	Date of Petition for Review:
)	January 5, 2021
vs.)	
)	
ILLINOIS COMMERCE COMMISSION;)	Date of Orders of the Illinois
DAKOTA ACCESS, LLC; ENERGY TRANSFER)	Commerce Commission
CRUDE OIL COMPANY, LLC;)	Sought To Be Reviewed:
INTERNATIONAL BROTHERHOOD OF)	October 14, 2020
ELECTRICAL WORKERS, LOCAL 702;)	December 2, 2020
LABORERS' INTERNATIONAL UNION OF)	(served December 2, 2020)
NORTH AMERICA, SOUTHWESTERN)	
ILLINOIS LABORERS' DISTRICT COUNCIL,)	
GREAT PLAINS LABORERS' DISTRICT)	
COUNCIL, SOUTHERN AND CENTRAL)	
ILLINOIS LABORERS' DISTRICT COUNCIL)	
AND ITS AFFILIATED LOCAL UNIONS, 231,)	
622, 773, 1197,)	
)	
Respondents-Appellees.)	

NOTICE OF APPEAL

TO: Elizabeth Rolando, Chief Clerk	All Parties on the Attached Service List
Illinois Commerce Commission	
527 East Capitol Avenue	
Springfield, Illinois 62701	

Pursuant to and in accordance with Section 10-201 of the Public Utilities Act, 220 ILCS 5/10-201, 83 Ill. Admin. Code § 200.890, Ill. S. Ct. R. 303, and other applicable law, Petitioners-Appellants Save Our Illinois Land, Sierra Club, Natural Resources Defense Council, and William Klingele appeal to the Appellate Court of Illinois, Fourth Judicial District, and seek review by the Court of the following actions of the Illinois Commerce Commission (“Commission”) in Docket

No. 19-0673, captioned *Dakota Access, LLC and Energy Transfer Crude Oil Company, LLC – Joint Petition for an Order under Section 8-503 of the Public Utilities Act for authority to install additional pumping stations and pumping facilities on existing certificated pipelines in the State of Illinois*: (1) the Commission’s denial of a petition for interlocutory review on April 1, 2020; (2) the Commission’s denial of a petition for interlocutory review on June 4, 2020; (3) the Commission’s adoption of the Order dated October 14, 2020; (4) the Commission’s denial of the application for rehearing on December 2, 2020; and (5) all other rulings and orders of the Commission supporting those actions in the proceeding below. Petitioners seek relief reversing the above actions of the Commission and remanding this matter to the Commission for further proceedings and the entry of an order on remand in accordance with the Court’s opinion and mandate.

Dated: January 5, 2021

Respectfully submitted,

SAVE OUR ILLINOIS LAND, SIERRA
CLUB, NATURAL RESOURCES DEFENSE
COUNCIL, AND WILLIAM KLINGELE

By: /s/ John D. Albers
One of their attorneys

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**APPEAL TO THE APPELLATE COURT OF ILLINOIS
FOURTH JUDICIAL DISTRICT
FROM THE ILLINOIS COMMERCE COMMISSION**

SAVE OUR ILLINOIS LAND; SIERRA CLUB; NATURAL RESOURCES DEFENSE COUNCIL; WILLIAM KLINGELE,	:	Petition for Review of Orders of the Illinois Commerce Commission in its Docket No. 19-0673
	:	
Petitioners-Appellants.	:	Date of Petition for Review: January 5, 2021
	:	
vs.	:	
	:	
ILLINOIS COMMERCE COMMISSION; DAKOTA ACCESS, LLC; ENERGY TRANSFER CRUDE OIL COMPANY, LLC; INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 702; LABORERS' INTERNATIONAL UNION OF NORTH AMERICA, SOUTHWESTERN ILLINOIS LABORERS' DISTRICT COUNCIL, GREAT PLAINS LABORERS' DISTRICT COUNCIL, SOUTHERN AND CENTRAL ILLINOIS LABORERS' DISTRICT COUNCIL AND ITS AFFILIATED LOCAL UNIONS, 231, 622, 773, 1197,	:	Date of Orders of the Illinois Commerce Commission Sought To Be Reviewed: October 14, 2020 December 2, 2020 (served December 2, 2020)
	:	
	:	
Respondents-Appellees.	:	

NOTICE OF FILING

TO: Elizabeth Rolando, Chief Clerk Illinois Commerce Commission 527 East Capitol Avenue Springfield, Illinois 62701	All Parties on the Attached Service List
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PLEASE TAKE NOTICE that on January 5, 2021, the undersigned caused to be filed with the Clerk of the Illinois Commerce Commission, 527 E. Capitol Ave., Springfield, Illinois 62701, the attached Notice of Appeal, via e-Docket on Behalf of Save Our Illinois Land; Sierra

Club; Natural Resources Defense Council; and William Klingele, a copy of which is hereby served upon you.

Dated: January 5, 2021

Respectfully submitted,

SAVE OUR ILLINOIS LAND; SIERRA
CLUB; NATURAL RESOURCES DEFENSE
COUNCIL; WILLIAM KLINGELE

By: /s/ John D. Albers
One of their attorneys

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that he has caused the Notice of Appeal of Save Our Illinois Land, Sierra Club, Natural Resources Defense Council, and William Klingele in Docket No. 19-0673 to be served on each of the persons on the Service List by e-mail on January 5, 2021.

/s/ John D. Albers

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Sierra Club, Natural Resources Defense Council,
and William Klingele

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